County of Sonoma
Permit & Resource Management Department

Sonoma County Planning Commission
STAFF REPORT

FILE: **UPE19-0083**
DATE: **June 17, 2021**
TIME: 1:05 pm
STAFF: Marina Herrera, Project Planner

SUMMARY

Property Owner:	Santa Rosa Horn Investors, LLC
Applicant:	Maria Kim of Complete Wireless Consulting, dba AT&T Mobility
Address:	4515 Santa Rosa Avenue, Santa Rosa
Supervisorial District(s):	Third District
APN:	045-041-034
Description:	Request for a Use Permit for an Intermediate Freestanding Commercial Telecommunications Facility, including a 96-foot high faux tree monopole (mono-pine), associated ground equipment cabinet and a 30KW generator and 190 gallon diesel tank for the purpose of emergency power, to be located within a 1,600 square foot lease area, enclosed by a six foot high fence on a ±21 acre parcel.
CEQA Review:	Categorical Exemption, Section 15303, New Construction of a Small Structure
General Plan Land Use:	Diverse Agriculture (DA - 20 acre density)
Specific/Area Plan Land Use:	Not applicable
Ordinance Reference:	Section 26-6-10 - 40. Agriculture and Resource Zones. Section 26-64-005 - 050. Scenic Resources Combining District. Section 26-65-005 - 040. Riparian Corridor Combining District. Section 26-67-005 - 050. Valley Oak Habitat Combining District. Section 26-88-130. Telecommunication Facilities
Zoning:	DA (Diverse Agriculture) B6 20 acre density and combining zones for RC 50/25 (Riparian Corridor with 50 foot structural setback and 25 foot agricultural setback), SR (Scenic Resources) and Valley Oak Habitat (VOH)

RECOMMENDATION

The Permit Resource and Management Department (Permit Sonoma) recommends that the Planning Commission conduct a public hearing and adopt a resolution denying the appeal of the Design Review Committee's design recommendation and approving the requested Use Permit to allow for an Intermediate Freestanding Telecommunications Facility.

EXECUTIVE SUMMARY

The proposed project is a new intermediate freestanding telecommunications facility, including a 96-foot high faux tree monopole (mono-pine) design on a 21.45 acre parcel zoned Diverse Agriculture at 4515 Santa Rosa Avenue, Santa Rosa.

On April 21 and May 19, 2021, the Design Review Committee (DRC) reviewed the proposed project. At the May 19 meeting, the DRC recommended the mon-pine design. SBA Steel, which operates its own tower in the vicinity of the proposed project, appealed the DRC recommendation to the Planning Commission under Section 26-82-050 of the Sonoma County Code. In light of the appeal, Permit Sonoma withdrew the project from the agenda for the Board of Zoning Adjustment's June 10 meeting, and scheduled this project for this meeting. Permit Sonoma recommends that the Planning Commission concurrently hear the DRC appeal and review the use permit. Concurrent scheduling will allow all parties an opportunity to be heard and voice objections, and enable the County to meet its current shot-clock deadlines.

Staff recommends denial of the appeal and approval of the permit for the following reasons: 1) the tower is consistent with the General Plan and Zoning Code, 2) the tower design is compatible with surrounding landscape features and the Design Review Committee has recommended the proposed mono-pine design, and 3) the applicant has met its burden that no available and technologically feasible alternative for the project exists.

A project alternatives analysis, photo simulations, radio frequency report, biological assessment, and noise assessment were prepared to assess potential impacts of the development. Potential impacts associated with the telecommunications tower have been addressed in the project Conditions of Approval, which include ongoing maintenance of the faux pine materials to ensure it remains consistent with its original state.

Due to federal regulations, telecommunication projects are subject to processing deadlines known as the "shot clock." Failure to make a final decision within the shot clock time frames can result in deemed approval of a project. The current shot clock deadline for this project is June 30, 2021.

PROJECT SITE AND CONTEXT

Federal Law

Federal law preserves local authority over land use decisions for wireless facilities, but sets forth specific limitations on that authority. Notably, federal law prohibits local governments from regulating telecommunication facility siting based on exposure to radio frequency emissions. Specifically, the Telecommunications Act of 1996 (the "Act") states:

> *"No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio*

> *frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."* 47 U.S.C. Section 332(c)(7)(B)(iv).

Thus, if an applicant demonstrates compliance with the federal radio frequency (RF) standards, the County cannot deny or modify the project based on "environmental effects of radio frequency emissions."

The applicant has submitted an RF emissions report prepared by Hammett & Edison, Inc., dated October 20, 2019, which analyzes the project's radiofrequency emissions. For this facility, the worst-case maximum exposure would be 0.05% of the federal RF limit at ground level, which is well within federal exposure limits. Therefore, this Board has no authority to deny or modify the proposed project based on concerns related to radiofrequency emissions.

In addition to barring local government from regulating the placement, construction, or modification of wireless facilities on the basis of the environmental effects of radio frequency emissions, the Act provides that local government regulation shall not *"unreasonably discriminate" between wireless carriers (i.e., approve a carrier at one site and then turn down another carrier at the same approximate location) or "prohibit or have the effect of prohibiting the provision of personal wireless services" (i.e., prevent a carrier from closing a significant gap in service coverage). See* 47 U.S.C. Section 332(c)(7)(B)(i). The applicant carries the burden of showing that a significant gap in coverage exists and that there is not "an available and technologically feasible alternative" to filling the gap that results in fewer or less severe environmental impacts.

Finally, the Act provides that any decision to deny a facility *"shall be in writing and supported by substantial evidence contained in a written record."* 47 U.S.C. Section 332(c)(7)(B)(iii).

Area Context and Surrounding Land Uses

Direction	Land Uses
North	Limited Urban Industrial (M1), Limited Rural Industrial (M3), Warehousing & Industrial Uses
South	City of Rohnert Park, a developed residential subdivision
East	Diverse Agriculture (DA, B6 10 & 20), Highway 101
West	Agriculture & Residential (AR B6 10), Rural Residential (B6 10, B6 5, B7), vacant agricultural parcel

Significant Applications Nearby

There are no nearby applications which would have a significant effect on the project's analysis or approval.

Access

The telecommunications facility lease area will be accessed from Santa Rosa Avenue, which is a County-maintained road. Verizon has proposed a new 20 foot wide non-exclusive access and utility easement, to provide for access from Santa Rosa Avenue to the proposed facility lease area.

Wildfire Risk

The project parcel is located within a Local Responsibility Area for fire protection and is currently served by the Sonoma County Fire Protection District. The development includes a 30KW generator powered by a 190-gallon diesel tank. The Generac diesel generator unit is compliant with National Fire Protection Association (NFPA)

code sections, specifically the following sections 37, Standards for Stationary Combustion Engines, 70 Electrical, 99 Use in Critical Health Care facilities, and 110 Fire Standards for Emergency and Standby Power Systems. The purpose of the diesel-powered generator is to supply power to the telecommunications facility in the event of a loss of power, including a PG&E Public Safety Power Shutoff, and the generator contains the capacity to run the facility for a maximum of 72 hours.

Water/Wastewater/Utilities

The proposed project will not facilitate an increase in water demand and wastewater facilities as it is an unmanned commercial telecommunications facility.

Agricultural Conditions/Land Encumbrances/Contracts

The project site is not subject to a Land Conservation (Williamson) Act Contract.

Other Environmental Conditions

The proposed project is within the Santa Rosa Plain Conservation Strategy Study Area, which is used as a local tool to determine when it is appropriate to request a biological assessment for potential impacts to California tiger salamander (CTS) and contains a designated Riparian Corridor along the frontage of the project site. The project is near the border of the "No Effect" area typically assigned to urban development and classified as "May adversely affect listed plants or CTS." The Biological Assessment conclude that there was no habitat within the study area and no suitable burrows were observed during the field survey on February 25, 2020. Environmental conditions of the project site are further addressed below within the Zoning and CEQA analysis. Condition of Approval #8 require the applicant to obtain an Incidental Take Permit (ITP) from the California Department of Fish & Wildlife (CDFW) prior to site preparation for construction.

Project History

The table below summarizes key project milestones and events.

Date	Project Event/Milestone
11/26/2019	Application filed
12/9/2019	Notice of Incompleteness
5/27/2020	Application Complete
6/3/2020	Early Neighborhood Notification
6/22/2020	Referral to prominent agencies
9/9/2020	Shot clock deadline (extended to 12/4/2020 by agreement of the parties)
10/8/2020	Design Review Committee Courtesy Notice
10/21/2020	Design Review Committee – Applicant requested Continuance to a date uncertain
11/4/2020	Shot clock deadline (extended to 4/30/2021 by agreement of the parties)
3/9/2021	Shot clock deadline (extended to 6/30/2021 by agreement of the parties)
4/9/2021	Design Review Committee Courtesy Notice
4/21/2021	Design Review Committee Meeting – DRC Requested continuance for additional design option

5/7/2021	Design Review Committee Courtesy Notice
5/19/2021	Design Review Committee Meeting
5/28/2021	Legal Notice posted onsite for Board of Zoning Adjustments Hearing
6/1/2021	Appeal of Design Review Recommendation filed
6/10/2021	Item removed from the Board of Zoning Adjustments Agenda
6/7/2021	Legal Notice posted onsite for Planning Commission Hearing

General Plan

The following General Plan policies are applicable to the project:

> ***Policy PF-2u:*** *Review proposals for public and private telecommunication facilities for consistency with General Plan policies and adopted siting and design criteria. In order for a public telecommunication facility to be found consistent with this plan, it must meet the standards and siting and design criteria of the applicable zoning district.*

The site's Diverse Agriculture General Plan Land Use designation allows for an Intermediate Freestanding Telecommunication Tower where a service coverage study shows that there is no other suitable location for the facility. The facility is considered a secondary use "incidental to and compatible with the primary use" because the small leasehold for the telecom facility would not preclude a future residential or agricultural use on the 21 acre property. It is compatible in that it does not generate significant traffic or loud noises and the faux pine design blends with the surrounding environment.

Zoning

The table below summarizes the development standards that apply to the site as outlined in the Sonoma County Zoning Ordinance, the existing and proposed development, and whether the project is consistent with the Zoning Ordinance.

The site has a zoning designation of DA (Diverse Agriculture) with a density of 20 acres per dwelling unit, RC50/25 (Riparian Corridor 50 foot setback for structures, 25 for agriculture), Scenic Resource (Scenic Corridor, Scenic Landscape Unit) and VOH (Valley Oak Habitat) combining designations.

Standard	Ordinance	Existing Condition	Proposed Project
Lot Area	20 acres	±21 acres	No change
Base Zone	DA B6 20	Vacant	Intermediate Commercial Telecommunication Facility
Residential Density	20 acres per unit	No dwellings onsite	No change
Front Setback	30'	No structures onsite	±83.9'
Side Setback	10'	No structures onsite	+28.6' (northern side) +20' (southern side)
Rear Setback	20'	No structures onsite	±800'

Height	35 ft	No structures onsite	96’
Lot Coverage %	15% or 18,000 sq. ft. whichever is greater	No structures on site	1,600 sq. ft. lease area or .17%
Parking Spaces	Not applicable.	None	No change

Combining Zoning Districts

Scenic Resource, Section 26-64-005-050

The project parcel has the combining zone of Scenic Resource due to the project sites location adjacent to Highway 101. Highway 101 is designated as a Scenic Corridor per the Sonoma County General Plan. Additionally, the site is located within a Scenic Landscape Unit as designated by the Sonoma County General Plan. Due to the Scenic Resource overlay, Permit Sonoma recommended that the Design Review Committee (DRC) review the project (although not required under the County Code). The DRC meeting was original scheduled on October 21, 2020, however a continuance was requested by AT&T to respond to claims made by SBA Steel, LLC.. The DRC reviewed the design at its April 21, 2021 meeting, at which time it requested a continuance to allow the applicant time to submit an additional design of a mono-pine. On May 19, 2021, the DRC again reviewed the design and recommended the proposed mono-pine design to the Planning Agency. The DRC record of action has been included as Attachment 11. Further discussion regarding the appeal of the DRC’s design recommendation is included below.

Due to its location in the SR Combining District, the proposed facility is subject to the requirements of 26-64-040, which requires a visual analysis that meets the following criteria: *A visual analysis, which may include photo montage, field mock up, or other techniques, shall be prepared by or on behalf of the applicant which identifies the potential visual impacts, at design capacity, of the proposed facility and its feasible alternatives. Consideration shall be given to views from public areas as well as from private residences, but shall focus on preservation of scenic resources. The analysis shall assess the cumulative impacts of the proposed facility and other existing and foreseeable telecommunication facilities, and shall identify and include all feasible mitigation measures consistent with the technological requirements of the proposed telecommunication service.*

Riparian Corridor, Section 26-65-005-040

The project parcel has the combining zone of Riparian Corridor due to a drainage canal located along the front of the project site. The Riparian Corridor overlay on this site requires a 50 foot structural setback. The Biological Assessment (Exhibit G) for this project identifies this drainage canal as flowing west offsite and joins with Laguna de Santa Rosa, a large wetland complex with many tributaries. Drainage from this area likely flows over uplands as sheet-flow into this wetland complex, the drainage canal, and/or onto Santa Rosa Avenue and into a storm-water drainage system. The proposed telecommunications facility will be setback 83 feet from the front property line or location of this drainage canal identified as a Riparian Corridor, therefore the project meets the requirements of this combining zone.

Valley Oak Habitat, Section 26-67-005

The project parcel has the combining zone of Valley Oak Habitat which requires compensation for the removal of valley oaks. The project does not propose removal of valley oaks to facilitate development.

Other Development Regulations or Guidelines

The proposed tower is considered an Intermediate Freestanding Commercial Telecommunication Facility pursuant to Zoning Code Section 26-02-140:

> ***Intermediate Facility.*** *Such facility, which involves a combination of towers and antennas greater than forty feet (40') and less than or equal to one hundred thirty feet (130') in height.*

The facility is considered a secondary use *'incidental and compatible with the primary use'* because the leasehold area for the proposed telecommunication facility does not preclude future agricultural or residential uses on the presently vacant 21 acre property. It is compatible in that it does not generate significant traffic or loud noises.

Telecommunication Facilities, Section 26-88-130

The Zoning Code lists the purpose of the DA (Diverse Agriculture) designation as: *"to enhance and protect those land areas where soil, climate and water conditions support farming but where small acreage intensive farming and part-time farming activities are predominant, but where farming may not be the principal occupation of the farmer; and to implement the provisions of the diverse agriculture land use category of the General Plan and the policies of the Agricultural Resource Element."* The DA (Diverse) zoning designation allows for Intermediate and Major Facilities with a Use Permit subject to the applicable criteria set forth in the telecommunications ordinance (Sonoma County Zoning Regulations - Section 26-88-130) requirements for Intermediate Facilities.

As an agricultural zoning district, the DA (Diverse Agriculture) zone is subject to the following specific criteria for Intermediate Freestanding Commercial Telecommunication Facilities:

Telecommunication Facilities, Section 26-88-130(b)(1)(iii) LIA, LEA, DA, RRD, RRDWA, and TP Districts

(iii) Intermediate and major freestanding commercial facilities shall meet the following standards:
(A) Towers shall meet the setback standards of subsection (b)(1)(ii)(A) of this section.
(B) For any proposed major facility, an alternatives analysis shall be prepared by or on behalf of the applicant, subject to the approval of the decision making body, which meets the requirements of subsection (a)(3)(xiv) of this section.
(C) A visual analysis.

Telecommunication Facilities, Section 26-88-130(b)(1)(ii)(A)

(ii) (A) Towers shall be set back from the nearest offsite dwelling unit by a minimum distance equivalent to one hundred ten percent (110%) of the height of the facility or the yard requirements of the applicable base district, whichever is more restrictive, provided that such setbacks may be waived pursuant to subsection (a)(3)(xv) of this section.

Alternatives Analysis

The applicant has provided an alternatives analysis showing a gap in service for cellular phone users that are traveling (in transit) and indoors (Exhibit E). The service gap is existing along Highway 101 north of Rohnert Park. The alternatives analysis meets the requirements of Section 26-88-130(a)(3)(xiv) of the Telecommunication section of the Sonoma County Zoning Code. Before identifying potential locations within the designated search ring, Verizon Wireless first begins with a search ring to identify potential co-location sites. Within the identified

search ring, there is one existing facility for potential colocation (the SBA Steel tower). However, the applicant has submitted evidence demonstrating that due to the type and height of telecommunication infrastructure at this site, specifically that the available centerline of this mono-pine is 63 feet in height, it would provide less coverage than the proposed facility. In addition, the applicant has submitted evidence demonstrating that this site is not available because it has been unable to obtain approval from the tower operator (SBA Steel) or the ground landlord for the colocation.

In total the feasibility study identified 19 potential sites, which were not chosen due to lack of owner interest and/or feasibility of coverage. The applicant also provided two alternative feasible service plans on sites, which were favorable to AT&T. These sites were eliminated due to site constraints.

Staff finds that the alternative analysis evaluated appropriate sites and that the applicant has met its burden that there is not an available and technologically feasible alternative site within the applicable service gap ring that would result in fewer or less severe environmental impacts.

Visual Analysis

The applicant has submitted photo simulations (Exhibit D) to allow for a Visual Analysis to meet the requirements of Section 26-88-130(b)(1)(iii)(C), which requires that "Facility towers, antennas and other structures and equipment shall be located, designed, and screened to blend with the existing natural or built surroundings so as to minimize visual impacts and to achieve compatibility with neighboring residences and the character of the community to the extent feasible considering the technological requirements of the proposed telecommunication service."

Based on Sonoma County's Visual Assessment Guidelines, staff has determined that the overall visual sensitivity of the site is "High" as the project is located within a Scenic Corridor and a Scenic Landscape Unit. While the project vicinity is largely developed, as it is located on the southern end Santa Rosa Avenue, which contains urban development. Staff finds the project is Co-Dominant in comparison to its surroundings because project elements such as the faux needles and trunk are compatible with surrounding landscape features. The top of the mono-pine would be 96 feet in height due to the 'crown' needed to provide for a natural taper to the tree. The centerline of the antennas would remain at 82 feet – while the 'crown' of approximately 10% or 9 feet provides for the maximum height of 96 feet. The mono-pine design would utilize a dark olive green and the bottom branches would be elongated, with three branches per foot to emulate a realistic mono-pine design. Based on the County's Visual Assessment Guidelines, a project with High sensitivity and Co-Dominant visual appearance has a significant visual impact.

Noise

As designed, the project will not produce significant noise during normal operation. However, emergency power is provided by a backup diesel-powered generator to keep cell transmissions operating during outages. Bollard Acoustical Consultants, Inc., prepared a noise study on October 8, 2019, which demonstrates that the backup generator noise levels are compliant with County Standards. The backup generator would result in 34 dB at the nearest property line, which is below the maximum allowed exterior noise exposures (50 Db during daytime and 45 dB during nighttime hours at 30-minute intervals in any hour). Additionally, the backup generator is for emergency purposes and will not be part of normal facility operations, and because the generator is proposed to equipped with an acoustical enclosure that significantly reduce equipment noise levels.

Environmental Analysis

A Biological Assessment prepared by Helix Environmental Planning in March of 2020 (Attachment 9) is required to demonstrate that the project would not have an adverse effect on any sensitive species that may be present in the area. The proposed project is within the Santa Rosa Plain Conservation Strategy Study Area, which is used as a local tool to determine when it is appropriate to request a biological assessment for potential impacts to California tiger salamander (CTS). The project is near the border of the "No Effect" area typically assigned to urban development and classified as "May adversely affect listed plants or CTS." The Biological Assessment conclude that there was no habitat within the study area and no suitable burrows were observed during the field survey on February 25, 2020. Furthermore the Biological Assessment, provided several recommendations for construction site management which have been incorporated as conditions of approval. Conditions of Approval additionally require the applicant to obtain an Incidental Take Permit (ITP) from the California Department of Fish & Wildlife (CDFW).

The project is categorically exempt from the California Environmental Quality Act (CEQA) under CEQA Guideline Section 15303, New Construction or Conversion of Small Structures as development will be limited to within a 1,600 square foot lease area and the total structure footprint is ±155 square feet. There are no facts or circumstances specific to this project that would support an exception to the categorical exemption.

NEIGHBORHOOD/PUBLIC COMMENTS

Early Neighborhood Notification was sent out on June 23, 2020 to property owners within a 300 foot radius of the project parcel. Additional Courtesy Notices were sent on behalf of the Design Review Committee meetings. Public comments have been received from SBA Steel, LLC, which operates a cell tower at 4291 Santa Rosa Avenue. SBA Steel contends that its tower is available for co-location as an alternative to installation of a new tower at the proposed site. The applicant has submitted a written response and contends that SBA has been unable to acquire additional space or confirm the ground landlord is amenable to an expansion of the existing lease area to accommodate ground equipment. These comments are attached.

APPEAL OF THE DESIGN REVIEW COMMITTEE'S DESIGN RECOMMENDATION

On May 19, 2021, the Design Review Committee (DRC) reviewed the proposed project and recommended the faux tree mon-opine design. DRC review is not required for telecommunications facilities under the Zoning Code (*see* Sonoma County Code Sections 26-88-130 and 26-64-040), but due to the project location in an SR Combining District, staff recommended the project for DRC review.

The DRC was initially scheduled to review the design on October 21, 2020 however a continuance to a date uncertain was requested by the applicant to address claims made by SBA. The DRC then reviewed the design on April 21, 2021 and the meeting was continued to allow the applicant to add a mono-pine design alternative. On May 19th, the DRC was presented by the applicant with three design alternatives: (a) Monopole, 86 feet; (b) Water Tank, 88-89 feet; and (c) Monopine, 96 feet. Following review and objection by SBA, the DRC recommended the mono-pine design.

SBA, which operates its own tower in the vicinity of the proposed project, appealed the DRC recommendation to the Planning Commission under Section 26-82-050 of the Sonoma County Code. The DRC Record of Action is included as Attachment 11. SBA Steel's Appeal is included as Attachment 4.

In light of the appeal, Permit Sonoma withdrew the project from the agenda for the Board of Zoning Adjustment's June 10th meeting, and recommends that the Planning Commission concurrently hear the DRC appeal and review the use permit at this meeting.

SBA identifies eleven grounds for appealing the DRC recommendation of the mono-pine design. Specifically, SBA alleges: (a) purported procedural defects of the meeting due to the fact that SBA could not share its screen (No. 1); (b) that DRC failed to consider whether the deny the project outright (No. 3); and (c) purported defects in the applicant's visual analysis and other materials submitted to the DRC (Nos. 2 & 4-11) such that the DRC's review and recommendation was an abuse of discretion.

Permit Sonoma recommends denial of the appeal for the following reasons:

First, there is no law, regulation or policy requiring the DRC to allow a member of the public to share his or her screen at a DRC meeting and SBA has cited no such authority for its position on this issue. At the May 19th meeting an appellant of a different project was granted such opportunity as SBA points out, but SBA was not an appellant at the DRC meeting, rather SBA was merely an interested member of the public with a right to be heard, and such right to be heard was granted in compliance with the Brown Act.

Secondly, the DRC does not have authority to grant or deny a use permit – such authority rests with the Planning Agency. Therefore, this is not a valid basis for appealing the recommendation.

Lastly, notwithstanding any purported misrepresentations, omissions, or defects in the visual analysis and related materials submitted by the applicant and planning staff, there was substantial evidence in the record to support the DRC's design recommendation, and the DRC did not abuse its discretion in issuing a recommendation.

Accordingly, Permit Sonoma recommends denial of the appeal.

RECOMMENDATIONS

Deny the Appeal

Permit Sonoma recommends denial of the appeal of DRC's design recommendation.

Approve the Permit

Staff recommends approval of the Use Permit subject to attached Conditions of Approval.

ATTACHMENTS

Attachment 1: Draft Resolution

Attachment 2: Draft Conditions of Approval

Attachment 3: Figures: 1. Vicinity Map; 2. Land Use Map; 3. Zoning Map

Attachment 4: Appeal submitted by John Henning, SBA Steel, LLC, June 1, 2021

Attachment 4-A: Monchamp Meldrum, LLP dba AT&T Mobility, Appeal Response, June 9, 2021

Attachment 5: Site Plan

Attachment 6: Photo Simulations

Attachment 7: Alternatives Site Analysis & Coverage Analysis

Attachment 8: Noise Study prepared by Bollard Acoustical Consultants, Inc. dated October 8, 2019

Attachment 9: Biological Assessment prepared by Helix Environmental Planning, dated March 2020

Attachment 10: Radio Frequency – Electromagnetic Energy (RF – EME) Compliance Report, October 20, 2019

Attachment 11: Design Review Committee Action, May 19, 2021

Attachment 12: Public Comment

Resolution Number

County of Sonoma
Santa Rosa, California

June 17, 2021
UPE19-0083

RESOLUTION OF THE PLANNING COMMISSION, COUNTY OF SONOMA, STATE OF CALIFORNIA, DENYING AN APPEAL OF THE DESIGN REVIEW COMMITTEE'S DESIGN RECOMMENDATION AND APPROVING A USE PERMIT FOR AN INTERMEDIATE FREESTANDING COMMERCIAL TELECOMMUNICATION FACILITY TO AT&T FOR THE PROPERTY LOCATED AT 4515 SANTA ROSA AVENUE, SANTA ROSA; APN 045-041-034

WHEREAS, the applicant, Maria Kim, representing Complete Wireless Consulting, DBA AT&T Mobility filed a Use Permit application with Permit Sonoma on February 13, 2019 for an Intermediate Freestanding Commercial Telecommunication Facility, including a 96-foot high monopole in the form of a faux pine tree, associated ground equipment, and a 30kw generator and a 190 gallon diesel tank for the purpose of emergency power; and

WHEREAS, the equipment is located within a 1,600 square foot fenced lease area, to be accessed by a new gravel maintenance driveway, on a 21 acre parcel at 4515 Santa Rosa Avenue, Santa Rosa; APN 045-041-034; and

WHEREAS, the project site is zoned Diverse Agriculture (DA – 20 acre density), Scenic Resources (SR), Riparian Corridor (RC) and Valley Oak Habitat (VOH), in Supervisorial District Number 3; and

WHEREAS, on May 19, 2021, the project was heard by the Design Review Committee which provided a preliminary recommendation of facility design of a 96-foot high monopole in the form of a faux pine tree (mono-pine) to the final decision making body; and

WHEREAS, on June 1, 2020, SBA Steel, LLC, which operates a telecommunications facility in the vicinity of the proposed project site, appealed the Design Review Committee's design recommendation to the Planning Commission; and

WHEREAS, in accordance with the provisions of the law, the Planning Commission held a duly noticed public hearing on June 17, 2021 to concurrently hear the design appeal and request for use permit, at which all interested persons were given an opportunity to be heard.

NOW THEREFORE BE IT RESOLVED that the Planning Commission denies the appeal submitted by SBA Steel, LLC; and

BE IT FURTHER RESOLVED that the Planning Commission determines that the project is Categorically Exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15303 (New Construction or Conversion of Small Structures) as the lease area will encompass 1,600 square feet and the total footprint of the structures is ±155 square feet. There are no facts or circumstances that would support an exception to the categorical exemption for this project.

BE IT FURTHER RESOLVED that the Planning Commission approves the requested Use Permit, subject to the Conditions of Approval as set forth in Exhibit "A", attached hereto and incorporated herein by reference, pursuant to the following findings:

1. The project is consistent with the General Plan land use designation of Diverse Agriculture, and General Plan Policies including, Policy PF-2u: "Review proposals for public and private telecommunication facilities for consistency with General Plan policies and adopted siting and design criteria." The faux pine tree will help to screen the tower and antennas and blend in with existing trees on site and in the project vicinity. Provision of a telecommunications tower in this site will help to close gaps in the service area for both people in transit or indoors.

2. The project is consistent with the requirements for siting a telecommunications tower within the DA (Diverse Agriculture) zoning designation and Scenic Resources (SR) combining zone because the proposal has demonstrated through an alternatives site analysis, which meets the requirements of Section 26-88-130(a)(3)(xiv) the Zoning Code, that there is no available and technologically feasible alternative site within the applicable service gap ring that would result in fewer or less severe environmental impacts. The applicant has prepared a visual analysis utilizing photo simulations as required by Sections 26-88-130(b)(1)(iii) and 26-64-040(c)(iv) of the Zoning Code, which identifies the potential visual impacts at design capacity, of the proposed facility.

3. The project is consistent with Section 26-88-130(a)(3)(ii) of the Zoning Code in that the faux pine tree design meets the requirement that "facility towers, antennas and other structures and equipment shall be located, designed, and screened to blend with the existing natural or built surroundings so as to minimize visual impacts and to achieve compatibility with neighboring residences and the character of the community to the extent feasible considering the technological requirements of the proposed telecommunication service" as it resembles vegetation present in the general vicinity.

4. The project as conditioned will not be detrimental to the health, safety, peace, comfort and general welfare of persons residing or working in the neighborhood, nor be detrimental or injurious to property and improvements in the neighborhood or the general welfare of the area:
   a) The antennas on the monopine cell tower will not exceed 96 feet in height;
   b) The facility will operate without disruption and enhance public safety by providing improved telecommunications service, including during times of power outages;
   c) Exterior lighting will be motion-sensored, low-mounted, downward casting and fully shielded to prevent glare. Lighting will not wash out structures or any portions of the site. Light fixtures will not be located at the periphery of the property and will not spill over onto adjacent properties or into the night sky. Flood lights are not permitted. Additionally, lighting plans will be designed to meet the Lighting Zone (LZ1 for dark areas, LZ2 for rural, LZ3 for urban) standards from Title 24, effective October 2005;
   d) The facility will operate below the maximum allowed exterior noise exposures of 50 dBA during daytime hours and 45 dBA during nighttime hours;
   e) The facility will be operated in compliance with the most current standard governing the limitation of human exposure to nonionizing electromagnetic radiation (NIER) used by the Federal Communications Commission applicable to the facility;

f) The entire facility, including all equipment, towers, antennas, etc., must be removed and the site restored to its pre-construction condition or other authorized use on abandonment or termination of the use;
g) The applicant's Federal Communications Commission license requirements require the applicant to mitigate any interference with local television or radio reception caused by the facility;
h) The facility must provide adequate warning of potential hazards as well as location and operator identification and a telephone number for public contact.

BE IT FURTHER RESOLVED that the Planning Commission designates the Secretary as the custodian of the documents and other material that constitute the record of proceedings upon which the Commission's decision herein is based. These documents may be found at the Permit Sonoma offices, 2550 Ventura Avenue, Santa Rosa, CA 95403.

BE IT FURTHER RESOLVED that the Planning Commission's action shall be final on the 11th day after the date of the Resolution unless an appeal is taken pursuant to Sonoma County Code Section 26-92-160.

THE FOREGOING RESOLUTION was introduced by Commissioner , who moved its adoption, seconded by Commissioner , and adopted on roll call by the following vote:

Commissioner
Commissioner
Commissioner
Commissioner
Commissioner

Ayes: Noes: Absent: Abstain:

WHEREUPON, the Chair declared the above and foregoing Resolution duly adopted; and

SO ORDERED.

SONOMA COUNTY PLANNING COMMISSION

EXHIBIT "A"

Conditions of Approval

Date: June 17, 2021 **File No.:** UPE19-0083
Site Address: 4515 Santa Rosa Avenue, Santa Rosa **APN:** 045-041-034
Applicant: Maria Kim of Complete Wireless Consulting, dba AT&T Mobility
Landowner: Santa Rosa Horn Investors, LLC

Project Description: Request for a Use Permit for an Intermediate Freestanding Commercial Telecommunications Facility, including a 96-foot high faux tree monopole (mono-pine), associated ground equipment cabinet and a 30KW generator and 190 gallon diesel tank for the purpose of emergency power, to be located within a 1,600 square foot lease area, enclosed by a six foot high fence on a ±21 acre parcel

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Prior to issuance of a Building Permit, evidence must be submitted to the file that all of the following conditions have been met.

FEES:

1. **Planning Condition Compliance Fee:** At the time of submitting a building permit application, the applicant/operator shall submit a Condition Compliance Review fee deposit to Permit Sonoma, with the appropriate amount to be determined consistent with the ordinance in effect at the time. In addition, the applicant/operator shall be responsible for payment of any additional compliance review fees that exceed the initial deposit (based upon hours of staff time worked) prior to final inspection being granted.

2. This "At Cost" entitlement is not vested until all permit processing costs and development fees are paid in full. Additionally, no grading or building permits shall be issued until all permit processing costs and development fees are paid in full.

PLANNING:
"Compliance with the conditions below have been verified " BY_____ DATE ____
Contact Permit Sonoma Planning at (707) 565-2397

3. **Type and Use:** Use Permit for an Intermediate Freestanding Commercial Telecommunications Facility, including a 96-foot high faux tree monopole (mono-pine), associated ground equipment cabinet and a 30KW generator and 190 gallon diesel tank for the purpose of backup emergency power. Associated project equipment is located

within a 1,600 square foot fenced lease area, to be enclosed by a six-foot fence.

4. **File Materials:** This approval is based on the application initially submitted on November, 26 2019 and other materials submitted thereafter, including but not limited to, revised studies, site plan, visual assessment, alternatives analysis and proposal statement submitted in March of 2021.

5. **Site Condition:** The faux characteristics of the tower shall be maintained in good condition, and replaced as needed to maintain high quality visual appearance, including monitoring and replacing branches or leaves as they are damaged by sun and weather to ensure a continued realistic look.

6. **Grading/Building Permits:** The applicant/operator shall include these Conditions of Approval on separate sheets of plan sets to be submitted for building and grading permit applications. All building and/or grading permits shall have the following note printed on plan sheets:

   a. ''In the event that archaeological resources, such as pottery, arrowheads, midden or culturally-modified soil deposits are discovered at any time during grading, scraping or excavation within the property, all work shall be halted in the vicinity of the find and County Permit Sonoma - Project Review staff shall be notified and a qualified archaeologist shall be contacted immediately to make an evaluation of the find and report to Permit Sonoma. Permit Sonoma staff may consult and/or notify the appropriate Tribal Representative from Tribes known to Permit Sonoma to have interests in the area. Artifacts associated with prehistoric sites include humanly modified stone, shell, bone or other cultural materials, such as charcoal, ash and burned rock indicative of food procurement or processing activities. Prehistoric domestic resources include hearths, firepits, or house floor depressions, whereas typical mortuary resources are represented by human skeletal remains. Historic artifacts potentially include all by-products of human land use greater than fifty (50) years of age, including trash pits older than fifty (50) years of age. When contacted, a member of Permit Sonoma Project Review staff and the archaeologist shall visit the site to determine the extent of the resources and to develop and coordinate proper protection/mitigation measures required for the discovery. Permit Sonoma may refer the mitigation/protection plan to the designated Tribal Representatives for review and comment. No work shall commence until a protection/mitigation plan is reviewed and approved by Permit Sonoma - Project Review staff. Mitigations may include avoidance, removal, preservation and/or recordation in accordance with California law. Archeological evaluation and mitigation shall be at the applicant's sole expense.

   b. If human remains are encountered, all work must stop in the immediate vicinity of the discovered remains and Permit Sonoma staff, the County Coroner and a qualified archaeologist must be notified immediately so that an evaluation can be performed.

If the remains are deemed to be Native American, the Native American Heritage Commission must be contacted by the Coroner so that a "Most Likely Descendant" can be designated and the appropriate provisions of the California Government Code and California Public Resources Code will be followed."

c. Building/grading permits shall not be approved for issuance by Project Review staff until the above notes are printed on the building, grading and improvement plans.

7. **Radiofrequency Monitoring:** No later than 60 days after replacement and/or modification of any equipment that increases output and/or radiated energy, the applicant/operator shall hire a third-party firm to conduct an independent Radio Frequency (RF) monitoring report to verify that the facility is operating within Federal standards. The monitoring report shall measure radiation at the property line at a point on a direct line between the monopole and the nearest residential structure. The final monitoring report shall be provided to Permit Sonoma Project Review staff for their review. If it is determined that the site is out of compliance with the Federal Communications Commission (FCC) regulations for human exposure to RF electromagnetic fields, the applicant/operator will be required to bring the cell site into compliance within fifteen days. On the fifteenth day, a follow-up monitoring visit shall be conducted by the third-party firm to confirm the site has come into compliance with FCC regulations. If compliance with FCC regulations is not achieved, the Use Permit shall be subject to revocation.

8. **California Tiger Salamander:** Prior to initiation of site preparation, the applicant is required to obtain an Incidental Take Permit (ITP) from the California Department of Fish & Wildlife (CDFW) pursuant to the California Endangered Species Act for take of California tiger salamander (CTS), and the applicant is required to provide mitigation for approximately 1 acre of impacts to potential CTS habitat, consistent with requirements of the Santa Rosa Plain Conservation Strategy and the 2007 Programmatic Biological Opinion. All CTS mitigation will be provided at an off-site location and will consist of purchase of CTS credits from an approved mitigation bank consistent with requirements of the 2007 Programmatic Biological Opinion and the Santa Rosa Plain Conservation Strategy. The CTS mitigation described above will be implemented prior to initiation of site preparation for the project. The appropriate mitigation ratio area and shall be negotiated with the USFWS and CDFG, and shall be no less than 1:1 unless the applicant is able to obtain a "no effect" determination or similar clearance by the US Fish & Wildlife Service (USFWS).

9. **Biological Assessment, Helix Environmental Planning, March 2020**
Avoidance Minimization Measures: The applicant will implement the following avoidance and minimization measures:
    a. If impacts to the canal will occur, a qualified botanist should conduct a special-status plant survey within the appropriate identification period for species with potential to occur within the Study Area. A survey conducted between May and

July should satisfy the identification period. The survey should take place prior to the initiation of any ground disturbing activities

b. Wildlife exclusion fencing should be installed around the entire Project area prior to construction to limit the likelihood of wildlife including California red-legged frog, western pond turtle, and California tiger salamander, from entering the Project area.
c. A qualified biologist should conduct pre-construction surveys for nesting birds (if construction is to occur during the nesting season). The survey should be conducted within 14 days prior to development or ground disturbing activities. If development does not commence within 14 days of the pre-construction surveys, or halts for more than 14 days, then additional surveys are required prior to resuming or starting work.
d. A pre-construction survey should be conducted within 24-hours of the start of construction to determine if California red-legged frogs, western pond turtles, and California tiger salamanders are present within the Project area. The presence of suitable California tiger salamander burrows within the Project area should also be determined during the survey. If burrows are observed, they should be marked and avoided with a 50-foot minimum buffer. If the burrows cannot be avoided, they should be appropriately excavated by a qualified biologist.
e. If California red-legged frog or California tiger salamander are observed during the preconstruction survey, no work shall occur until CDFW and/or USFWS has been consulted to determine appropriate mitigation and avoidance measures. If western pond turtle is observed during the pre-construction survey, it is recommended that a qualified biologist monitor the initiation of construction to ensure no western pond turtles are present in the construction zone and appropriate avoidance measures can be taken during construction initiation.
f. A qualified biologist should conduct environmental awareness trainings to all Project-related personnel prior to the initiation of work. The trainings should cover all special-status plant and wildlife species with the potential to occur within the Study Area.
g. It is currently expected that all aquatic resources within the Study Area will be avoided. If site plans change and impacts to aquatic resources will occur, obtain 404 and 401 permits for any impacts to waters of the U.S. and file a waste discharge report for impacts to waters of the State not subject to regulation under the Clean Water Act; Submit a 1600 Lake and Streambed Alteration Notification to CDFW for any impacts to aquatic features subject to CDFW jurisdiction, if needed.

10. **Lighting:** Exterior lighting shall be low-mounted, downward-casting and fully shielded to prevent glare. Lighting shall not wash out structures or any portions of the site. Light fixtures shall not be located at the periphery of the property and shall not spill over onto adjacent properties or into the night sky. Flood lights are not permitted. All parking lot

and street lights shall have full cut-off fixtures. Lighting shall shut of automatically after closing and security lighting shall be motion sensor activated.

11. **Trash, Litter, and Graffiti:**
    a. The applicant/operator shall remove all graffiti from the premises under the control of the operator within 72 hours of discovery of its application.
    b. A phone number shall be posted for the public to report graffiti to the applicant/operator.
    c. Following assembly and installation of the facility, all waste and debris shall be removed and disposed of in a lawful manner.
    d. Within the subject site, the premises under the control of the applicant/operator is to be maintained free of litter at all times.

12. **Reception Interference:** The applicant/operator of any facility that causes interference with local television or radio reception shall be responsible for mitigation of such interference in accordance with the applicant's/operator's applicable FCC license requirements.

13. **Facility Decommissioning:** Upon abandonment or termination, the entire facility, including all equipment, towers, antennas, etc., shall be removed and the site restored to its pre-construction condition or other authorized use.

14. **Access Driveway:** Prior to Building Permit application, the applicant/operator shall demonstrate that they have rights to access the subject leased area and construct the access driveway with formalized documentation such as an access and utility easement.

15. **Accidental Discovery:** All activities must cease if Tribal cultural resources are uncovered during construction. Immediately upon discovery, the applicant/operator must contact the appropriate Federal Agency, Permit Sonoma, and the Tribe. The applicant/operator must work with an archaeologist meeting the Secretary of Interior qualifications to isolate the area of discovery and protect the cultural resources

16. **Conformance with Statutes:** This use shall be constructed, maintained, and operated in conformance with all applicable County and State statutes, ordinances, rules, and regulations. A violation of any applicable statute, ordinance, rule, or regulation shall be considered a violation of the Use Permit, making it subject to revocation or modification.

17. **Other Telecommunication Users:** The facility operator and property owner shall endeavor to make available any unutilized space for future co-located or multiple-user telecommunication facilities, including space for those entities providing similar, competing services.

Operational Requirements:

Septic:

18. This is an unmanned facility with no water or sewage facilities. Therefore, no occupancy at the site is allowed and site visits shall not exceed two hours.

Noise:

19. Noise shall be controlled in accordance with the standards set in the Noise Element of the Sonoma County General Plan, as measured at the exterior property line of any affected residential or sensitive land use:

TABLE NE-2: Maximum Allowable Exterior Noise Exposures

Hourly Noise Metric[1], dBA	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
L50 (30 minutes in any hour)	50	45
L25 (15 minutes in any hour)	55	50
L08 (4 minutes 48 seconds in any hour)	60	55
L02 (72 seconds in any hour)	65	60

[1] The sound level exceeded n% of the time in any hour. For example, the L50 is the value exceeded 50% of the time or 30 minutes in any hour; this is the median noise level. The L02 is the sound level exceeded 72 seconds in any hour.

Radioactivity, Electrical Disturbance or Electromagnetic Interference:

20. No activities shall be permitted which emit dangerous radioactivity at any point, or electrical disturbance or electromagnetic interference adversely affecting the operation at any point of any equipment other than that of the creator of such disturbance.

Radio Frequency Emissions:

21. The facility shall be operated so that it shall not result in human exposure to radio frequency (RF) emissions in excess of the levels specified in the most current standard governing human exposure to radio frequency emissions utilized by the Federal Communications Commission (FCC) in its licensing decision for the applicable facility. The applicant/operator shall be responsible for demonstrating that the facility complies with this standard by providing a copy of an FCC-issued permit, license, or waiver, evidence that the FCC has categorically excluded this facility, or an engineered study demonstrating that the facility meets all applicable FCC requirements.

BUILDING:
"Compliance with the conditions below have been verified " BY_____ DATE ____
Contact Building Plan Check at 707-565-2095.

22. The applicant/operator shall apply for and obtain building-related permits from Permit Sonoma for new structures. The necessary applications appear to include, but may not be limited to, building permit(s). Construction inspections shall have occurred and the building permit(s) finalized prior to occupancy of new or remodeled structure(s).
23. The California Business & Professions Code requires plans and calculations affecting structural elements or required exiting provisions to be prepared by California licensed design professionals (architects, engineers).

24. A geotechnical investigation, in accordance with California Building Code (CBC) Chapter 18, shall be provided for the proposed construction. Geotechnical recommendations shall be adhered to in the proposed design and verification shall be provided by the geotechnical engineer of record that all applicable plans, details, and specifications are in accordance with applicable recommendations.

25. The construction plans shall indicate that the proposed facility is to be frequented only by service personnel for maintenance, repair or occasional monitoring of equipment; otherwise, the facility would be subject to accessibility provisions of CBC Chapter 11B.

26. A statement of special inspections shall be submitted, identifying all required 3rd party observation and testing, as required per Chapter 17 of the CBC.

27. Construction plans shall be uploaded in a single pdf document for review. All sheets shall be of the same size and orientation. All sheets shall be digitally signed, sealed, and dated in accordance with the California Business and Professions Code. Supporting documentation may be uploaded in separate files, and these shall be also signed, sealed, and dated in accordance with the California Business and Professions Code.

28. A design professional in responsible charge shall be identified on the proposed Cover Sheet of the project plans. This individual shall be responsible of reviewing and coordinating all submittal documents prepared by others, in accordance with CBC Section 107.3.4.

29. If any changes to plans, drawings, documents or specifications are required pursuant to any conditions herein specified occur, these changes shall be brought to the appropriate department for review and approval prior to any construction or improvements. These changes shall be reviewed by all departments involved in the initial approval of the subject plans, drawings, documents or specifications that are proposed for change.

GRADING & STORM WATER:
"Compliance with the conditions below have been verified" BY _____ DATE _____
Contact Permit Sonoma Grading & Storm Water at (707) 565-1691

30. Grading and/or building permits require review and approval by the Grading & Storm Water Section of the Permit and Resource Management Department (Permit Sonoma) prior to issuance. Grading permit applications shall abide by all applicable standards and provisions of the Sonoma County Code and all other relevant laws and regulations.

FIRE PREVENTION:
"Compliance with the conditions below have been verified " BY_____ DATE ____
Contact Fire and Emergency Services at 707-565-2361

31. Prior to any construction, or changes in use of existing building or facilities, applicable Fire Code construction permits required by Chapter 1, Division II of the California Fire Code as adopted and amended by Sonoma County Code shall be obtained from the Sonoma County Fire Prevention Division.
    a. The applicant or owner shall demonstrate all existing use permit conditions are in compliance and recommend changes to address previously approved conditions set by the Fire Code Official.

32. Owners and Operators shall provide evidence to Sonoma County Fire that the fire service features for buildings, structures and premises will comply with the California Fire Code as adopted and amended by Sonoma County Code. Including but not limited to: fire apparatus access roads; access to building openings and roofs; premises identification and road naming; gate access & key boxes; fire protection water supplies; and building features.
    b. Access roads: minimum emergency access is required to provide safe access for emergency fire equipment and civilian evacuation concurrently, and to allow unobstructed traffic circulation during a wildfire or other emergency
    c. Premises Identification and Road Naming: Approved road names & signs, address numbers, building numbers or approved building identification placed in a position that is plainly legible and visible from the street or road shall be provided
    d. Gates: Where gates or similar barriers are installed across access roads, an approved lock shall be installed as required by the fire code official.

33. Owners and Operators shall provide evidence to Sonoma County Fire that applicable Fire Code Operational Permits required by Chapter 1, Division II of the California Fire Code as adopted and amended by Sonoma County Code will be obtained from Sonoma County Fire or the local fire code official.

34. The applicant/operator shall provide evidence to Sonoma County Fire that applicable Fire Code Operational Permits required by Chapter 1, Division II of the California Fire

Code, as adopted and amended by Sonoma County Code, will be obtained from Sonoma County Fire or the local fire code official.

35. Prior to any business operation, the applicant/operator shall provide evidence to Sonoma County Fire that the prevention, control and mitigation of dangerous conditions related to storage, dispensing, use and handling of hazardous materials will be in accordance with Chapter 50 of the California Fire Code, as adopted and amended by Sonoma County Code as follows:
    e. Provide CUPA Exemption form
    f. Provide CERS ID Number
    g. Contact Hazmat CUPA Division for inspection clearance 707-565-1152
    h. This is not required when the facility falls under exemptions allowed in code.

36. Due to the scope of this project a Fire Services Pre-Construction meeting or occupancy fire inspection is required at the applicant's/operator's cost with the local fire authority included. This requirement can be waived by written approval by the fire code official.

GENERAL CONDITIONS:

37. Any proposed modification, alteration, and/or expansion of the use authorized by this Use Permit shall require the prior review and approval of Permit Sonoma or the Board of Zoning Adjustments, as appropriate. Such changes may require a new or modified Use Permit and additional environmental review, if warranted.

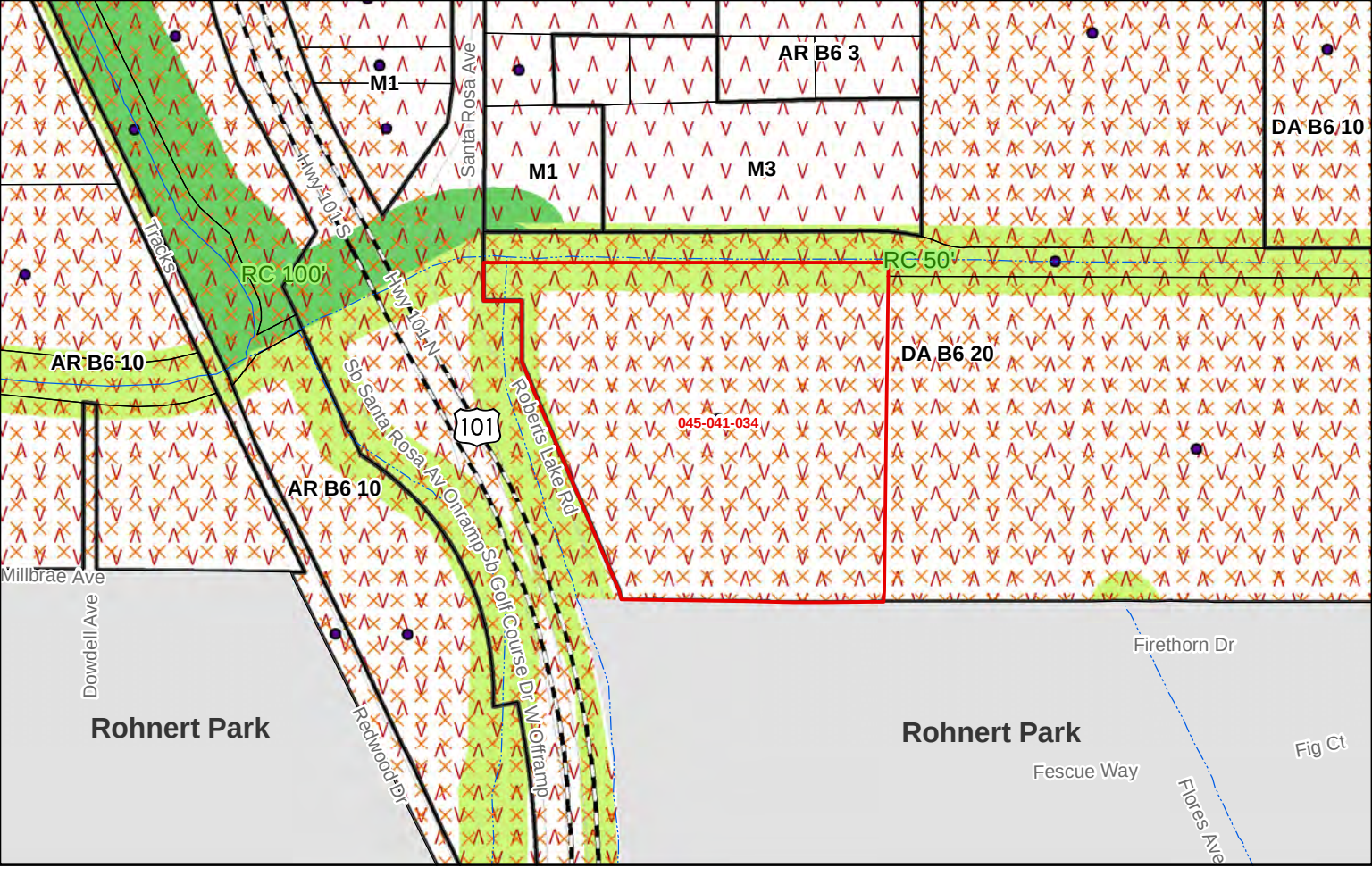
38. The Director of Permit Sonoma is hereby authorized to modify these conditions for minor adjustments to respond to unforeseen field constraints, provided that the goals of these conditions can be safely achieved in some other manner. The applicant/operator must submit a written request to Permit Sonoma demonstrating that the condition(s) is infeasible due to specific constraints (e.g., lack of property rights) and shall include a proposed alternative measure or option to meet the goal or purpose of the condition. Permit Sonoma shall consult with affected departments and agencies and may require an application for modification of the approved permit. Changes to conditions that may be authorized by Permit Sonoma are limited to those items that are not adopted standards or were not adopted as mitigation measures or that were not at issue during the public hearing process. Any modification of the permit conditions shall be documented with an approval letter from Permit Sonoma and shall not affect the original permit approval date or the term for expiration of the permit.

39. This permit may be subject to suspension, revocation or modification by the Board of Zoning Adjustments if the Board finds: (a) there has been noncompliance with any of the conditions; (b) the circumstances under which the permit was granted have changed and the public health, safety and welfare require the suspension, revocation, or modification; (c) the permit was granted in whole or in part, on the basis of a misrepresentation or omission of a material statement by the Applicant/Business Owner/Operator; or (d) the use for which this permit is hereby granted constitutes a

nuisance. Any such revocation shall be preceded by a public hearing noticed and heard pursuant to Section 26-92-120 and 26-92-140 of the Sonoma County Code.

40. In any case where a Use Permit has not been used within two years after the date of the granting thereof, or for such additional period as may be specified in the permit, such permit shall become automatically void and of no further effect, provided however, that upon written request by the applicant prior to the expiration of the two-year period the permit approval may be extended for not more than one year by the authority which granted the original permit, pursuant to Section 26-92-130 of the Sonoma County Code.


AIR CENTER
SOUTHWEST COMM. PK
BELLEVUE AV.
CORBY AV.
S. WRIGHT
LUDWIG AV.
COTATI RD.
TODD RD.
6.5
MOORLAND AV.
SANTA ROSA
PETALUMA HILL RD.
5.1
VALLEY
Matanzas Cr. Reservoir
TAYLOR MTN. EL. 1401
5.4
WARRINGTON RD.
MOUNTAIN VIEW AV.
GUENZA RD.
3.5
LLANO RD.
WALKER AV.
ARLINGTON AV.
SCENIC AV.
5.8
VALLEY
LN.
INVERNESS AV.
CANYON RD.
Cunningham
MILLBRAE AV.
WILFRED AV.
12
CRANE RD.
1.2
116
Rosa
5.1
GRAVENSTEIN
HESSEL RD.
TURNER RD.
STONY POINT
SANTA ROSA
Hinebaugh Cr.
KEISER AV.
2.5
ROHNERT PARK EXPRESSWAY
Rohnert Park EL. 102
SNYDER
CAL. STATE COLLEGE, SONOMA
Copeland Cr.
PRESSLEY
Cr. Cr.
Gossage
HWY. 1
1.5
.4
COTATI AV.
HILL
ROBERTS RD.
LICH



Zoning and Combining Districts

- Zoning by Area
- AH Affordable Housing
- LU Policy
- HD Historic District
- LG Local Guidelines
- SR Scenic Resource
- VOH Valley Oak Habitat
- BH Biotic Habitat
- MR Mineral Resource
- G Geologic Hazard
- F1 Floodway
- F2 Floodplain

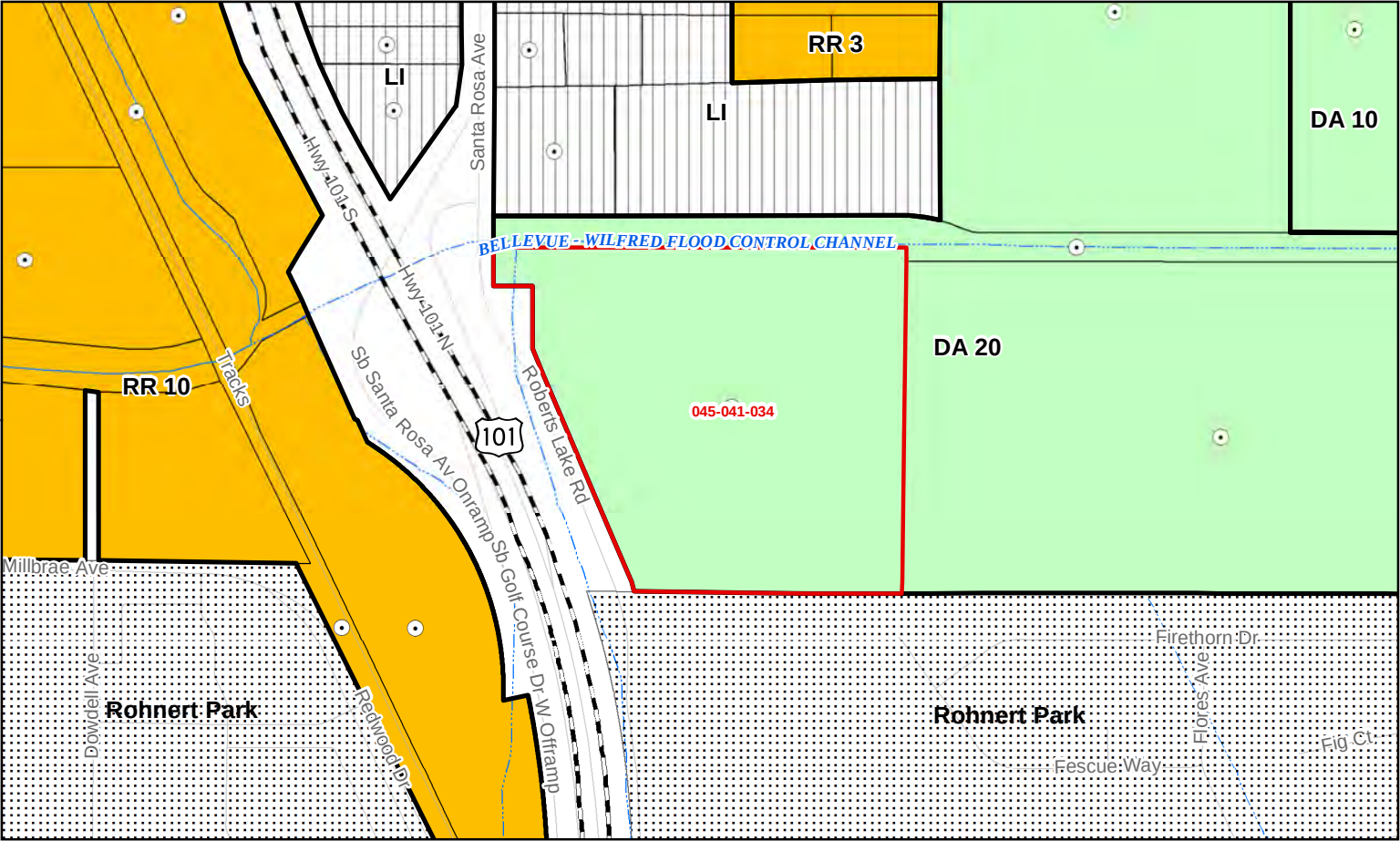
RC Riparian Corridor

Width

- 50'
- 100'
- 200'

0 125 250 500 Feet

1 inch equals 500 feet



General Plan Land Use

- Diverse Agriculture
- Land Extensive Agriculture
- Land Intensive Agriculture
- Resources & Rural Development
- Rural Residential
- Urban Residential
- Recreation / Visitor-Serving Commercial
- General Commercial
- Limited Commercial
- Limited Commercial Traffic Sensitive
- General Industrial
- Limited Industrial
- Public / Quasi-Public
- Planning Area Policy
- Affordable Housing
- City

Base Map Data

- City Limit
- Street
- Perennial Stream
- Intermittent Stream

0 125 250 500 Feet

1 inch equals 500 feet

Numbers on map indicate maximum density in Acres/Unit, except Urban Residential where numbers indicate Units/Acres.

JOHN A. HENNING, JR.
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125 N. SWEETZER AVENUE
LOS ANGELES, CALIFORNIA 90048

TELEPHONE: (323) 655-6171
E-MAIL: jhenning@planninglawgroup.com

June 1, 2021

APPEAL FROM DESIGN REVIEW COMMITTEE TO PLANNING COMMISSION

VIA ELECTRONIC MAIL

Marina Herrera, Project Planner
Permit & Resource Management Department, Planning Division
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee hearing May 19, 2021)

Dear Ms. Herrera:

I represent SBA Steel, LLC, which operates a cell tower at 4291 Santa Rosa Avenue, about 750 feet northwest of the new AT&T cell tower proposed in the above case. On behalf of my client (hereinafter the "Appellant"), we hereby appeal the entire decision of the Design Review Committee (hereinafter the "Committee") on May 19, 2021, as reflected in the attached Design Review Committee Record of Action. Such appeal is made to the Planning Commission pursuant to section 26-82-050 of the Sonoma County Code.

A. Name and Contact Information for Appellant.

The appellant and its contact information are as follows:

SBA Steel, LLC
c/o SBA Communications Corporation
8051 Congress Avenue
Boca Raton, FL 33487-1307
ATTN: Jason Laskey, ph. (561) 981-7455

B. <u>Grounds for Appeal</u>.

The grounds for the appeal include, but are not limited to, the following:

1. The Committee did not follow proper procedure for the conduct of its public hearing because the chair of the committee repeatedly denied the appellant's request to display exhibits (using the "share screen" feature in the Zoom program), while at the same time allowing both staff and the applicant – as well as the appellant in a previous public hearing on the same date – to freely use this "share screen" feature for their respective presentations. This precluded the Appellant from displaying any physical exhibits whatsoever to the Committee, including but not limited to simulations, plans and photographs, even though the Committee's sole task was to evaluate the design of the project based upon such physical exhibits.

2. Staff and the applicant misrepresented the perspective from which the underlying photograph in a key photo simulation was taken, i.e., as being from Roberts Lake Road when in fact the photograph was on its face taken from a perspective more than 100 feet further away from the project, i.e., along the breakdown lane of the northbound 101 freeway. The Appellant's representative noted this error during his comments but the chair of the committee repeated the error by agreeing with staff and the applicant. This error resulted in a vast underestimation of the visual impact of all three proposed designs of the project from Roberts Lake Road.

3. All of the three proposed alternative designs will have significant adverse impacts on aesthetics, the environment and neighboring properties. These impacts can be avoided, and AT&T can obtain the coverage it needs easily, promptly and cost-effectively, by simply co-locating its equipment on the Apellant's existing tower, with some relatively minor alterations. Yet the Committee refused to consider the alternative of denying the project outright due to its adverse impacts and the availability of a nearby colocation site.

4. The simulations of the water tank alternative design presented by the applicant and the elevation plans of such design bear no resemblance to each other. The Committee could not compare alternative designs without accurate plans and simulations for the water tank design.

5. The simulations of the monopine alternative design presented by the applicant and the elevation plans of such design bear no resemblance to each other. The Committee could not compare alternative designs without accurate plans and simulations for the monopine design.

6. The elevation plans of the monopine alternative design specifically state that the "BRANCHES SHOWN ARE FOR ILLUSTRATIVE PURPOSES ONLY. NOT TO SCALE." Thus, the plans on their face do not accurately represent the design. The Committee could not compare alternative designs without accurate plans for the monopine design.

7. There are no section plans, materials plans or other detail plans in the record showing the actual design of the water tank alternative design. The Committee could not compare alternative designs without a complete set of plans for the water tank design.

8. There are no section plans, materials plans or other detail plans in the record showing the actual design of the monopine alternative design. The Committee could not compare alternative designs without a complete set of plans for the monopine design.

9. Given the lack of accurate and complete plans and simulations for the water tank and monopine designs, the Committee's approval and preliminary recommendation of the monopine alternative design was an abuse of discretion.

10. The "visual analysis" required by section 26-64-040(c)(4) of the Sonoma County Code for telecommunication facilities in the SR district has not been performed in accordance with that code section for any of the three considered alternatives. Specifically, the visual analysis presented by the applicant for each of the alternatives does not, as the code requires: (1) "identif[y] the potential visual impacts, at design capacity, of the proposed facility and its feasible alternatives; (2) "[give] [c]onsideration … to views from public areas as well as from private residences [with] focus on preservation of scenic resources; (3) "assess the cumulative impacts of the proposed facility and other existing and foreseeable telecommunication facilities"; or (4) "identify and include all feasible mitigation measures consistent with the technological requirements of the proposed telecommunication service."

11. Given the lack of a proper "visual analysis" for any of the alternative designs, the Committee's approval and preliminary recommendation of the monopine alternative design was an abuse of discretion.

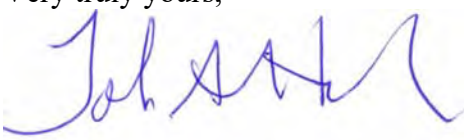
The Appellant will elaborate on the above grounds and provide additional grounds for the appeal in correspondence to the Planning Commission prior to the public hearing on the appeal.

C. <u>Conclusion</u>.

We respectfully request that the Planning Commission reverse the decision of the Design Review Committee, continue the public hearing and require the applicant to present the Planning Commission with a complete and accurate set of plans and simulations and a complete visual analysis before making a design recommendation to the Board of Zoning Adjustments.

Thank you for your kind consideration of our appeal.

Very truly yours,



John A. Henning, Jr.

Enclosure (Design Review Committee Record of Action)

DESIGN REVIEW COMMITTEE RECORD OF ACTION

May 19, 2021

ITEM NO: 2
Time: 1:35 pm
File No.: UPE19-0083

Subject: Intermediate Freestanding Commercial Telecommunications Facility
Applicant: Complete Wireless Consulting dba AT&T Mobility
Staff: Marina Herrera

Location: 4515 Santa Rosa Avenue, Santa Rosa
APN: 045-041-034 **Supervisorial District:** No. 3

Proposal: Request for formal recommendation to the BZA on the proposed preliminary design for an Intermediate Freestanding Commercial Telecommunications Facility, including three design options ranging in height from 86 feet to 96 feet, associated ground equipment located within a 1,600 square foot lease area, enclosed by a 6 foot fence, located on a ±21 acre parcel.

Zoning: DA B6 20, RC50/25 SR VOH

CEQA Review: Exempt **Final Authority:** BZA

Related Actions: DRC Preliminary - April 21, 2021

ATTENDANCE
Committee: Don McNair, Jim Henderson, Derik Michaelson
Staff: Marina Herrera
Applicant: Maria Kim
Others: n/a

REVIEW LEVEL: ☒ Preliminary ☐ Final Review ☐ Conceptual

ACTION: RECOMMEND APPROVAL

COMMENTS *

Project Design				
Site Plan:				
Architecture:				
Parking Design:				
Landscaping:				
Color/Materials:				
Signage:				
Lighting:				
Other:				

VOTE: ☒ Don McNair ☒ Jim Henderson ☒ Derik Michaelson

Ayes: 3 **Noes:** 0 **Absent:** 0 **Abstain:** 0

* Attachment

COUNTY OF SONOMA
DESIGN REVIEW COMMITTEE RECORD OF ACTION
COMMENTS / CONDITIONS

Applicant:	Complete Wireless Consulting dba AT&T Mobility	**Date:**	May 19, 2021
		File:	UPE19-0083
Address:	4515 Santa Rosa Avenue, Santa Rosa	**Action:**	RECOMMEND APPROVAL
APN:	045-041-034		

NOTE: Applicants shall submit project revisions as specified below. A written response addressing each comment is required. Responses to Final Review comments shall be confirmed by planning staff during the permitting and plan check process.

GENERAL
1. DRC recommends to the BZA approval of the mono-pine design and associated equipment cabinet and fencing as proposed

SITE PLAN
2. Recommend approval to BZA

ARCHITECTURE
3. Recommend approval to BZA

PARKING / CIRCULATION
4. n/a

LANDSCAPING
5. n/a

COLORS / MATERIALS
6. Recommend approval to BZA

LIGHTING
7. Recommend approval to BZA

SIGNAGE
8. n/a

OTHER
9. n/a

PUBLIC COMMENTS

☐ None ☒ Attached ☐ Noted:

ATTACHMENTS
1. Public comment - Balistreri, 5/19/21
2. Public comment - FirstNet, 5/17/21

From:	Marina Herrera
To:	Elaine Murillo
Subject:	FW: Request-Digital documents for Design Hearing
Date:	Wednesday, May 19, 2021 3:06:13 PM
Importance:	High

From: Juliana Balistreri <jmb.metta121@gmail.com>
Sent: Wednesday, May 19, 2021 2:37 PM
To: Marina Herrera <Marina.Herrera@sonoma-county.org>
Subject: Re: Request-Digital documents for Design Hearing

Hi Marina.

Re: UPE19-0083

Unfortunately I have another meeting and couldn't stay on the zoom.

Here is my public input:

1) If it is still possible, please co-locate the AT&T tower with the existing site that is north on Santa Rosa Ave.

2) Unless the tree is VERY natural looking, I prefer the tower design. I do not like the plain cell tower at all.

I assume the water tower will be well-designed and structural sound, with questions posed at the last meeting included and addressed.

Most of the tree towers I've looked at recently are not natural looking. They look very fake and colored and oddly shaped. For that reason, I think a presumably well-designed water tower will be more aesthetically pleasing and suitable for that spot. Clearly, a manmade structure will be there so my opinion is that a water tower would be a better option than a very fake tree or a plain metal cell tower.

Thank you for your consideration.

Juliana Balistreri
130 Firethorn Dr
Rohnert Park, CA 94928
(707) 585-2358

May 17, 2021

Design Review Committee, c/o Marina Herrera - Project Planner
Permit & Resource Management Department, Planning Division
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

RE: AT&T MOBILITY - NATIONWIDE PUBLIC SAFETY BROADBAND NETWORK NEW CELL SITE APPLICATION – Santa Rosa Ave & Hwy 101 Area

Ms. Herrera,

Under the Middle Class Tax Relief and Job Creation Act of 2012, Congress established the First Responder Network Authority (FirstNet Authority) and directed it to ensure the building, deployment, and ongoing operation of the Nationwide Public Safety Broadband Network ("FirstNet"), the first nationwide high-speed broadband network dedicated to public safety.[1] The FirstNet Authority's mission is to provide and maintain a single, interoperable platform that consistently satisfies the demanding communications needs of the public safety community in California and across the country. New radio access network ("RAN") sites are essential to the success of the program and delivering the mission critical coverage public safety needs to communicate and save lives.

This network has been a top priority for first responders and public safety agencies in California and throughout the country, and has been designed based on their specific, expressed needs, with coverage and capacity being paramount. Simply put, coverage enables a first responder to send and receive data, and capacity ensures speed and quality of those communications. New RAN infrastructure connected to FirstNet will improve communication for first responders where that infrastructure has been currently lacking. The FirstNet Authority and our private-sector partner, AT&T, have worked with the California public safety community to identify coverage needs throughout the state to improve emergency communications in everyday use as well as for large-scale emergencies, such as the recent wildfires that ravaged the state.

[1] *See* Title VI of the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96), https://www.congress.gov/112/bills/hr3630/BILLS-112hr3630enr.pdf

In December 2017, Governor Brown opted into the FirstNet Authority plan for RAN deployment in California and thus authorizing construction of the FirstNet network in areas of the state where public safety needs coverage and capacity. By opting-in, the Governor enabled public safety to rapidly access broadband services in California, while also allowing the prompt buildout and deployment of the network which began in March of 2018. His decision also directed the FirstNet Authority to take on all the risks, costs, and responsibilities associated with deploying the network in California for 25 years, and take immediate steps to make prioritized services and features available to public safety in the state.

This network not only meets the needs of Santa Rosa, Rohnert Park, and the surrounding community, but will also serve the thousands of first responders that have already adopted FirstNet in California that may respond to your next major emergency, and to the ongoing COVID-19 Pandemic. For example, as a first responder to the Kincade Fire in 2019, I relied heavily on the network for data and voice communications in this area while leading my strike team. The FirstNet Authority requests your consideration in our efforts to build new sites to achieve required coverage and capacity for our vital mission in service of public safety.

We have two Senior Public Safety Advisors assigned to California: Kevin Nida and myself. We are retired Chief Fire Officers with extensive fire service, law enforcement, and technical experience. We are available to assist you at any time. I may be reached at chris.baker@firstnet.gov or (240) 751-8027. Kevin may be reached at kevin.nida@firstnet.gov or (202) 868-7670. For your reference, attached is additional information about the FirstNet Authority and the network we were entrusted by Congress to establish.

Sincerely,

Chris Baker, J.D., P.E.
Battalion Chief-Paramedic / Investigator (Ret.)
Senior Public Safety Advisor – Northern California
First Responder Network Auhority

Attachments:

1. Primer on the FirstNet Authority's Congressional Mandate to Deploy a Nationwide Public Safety Broadband Network.

2. FirstNet Network Management-Operations Officer Letter.

MONCHAMP MELDRUM LLP

Via email Marina.Herrera@sonoma-county.org

June 9, 2021

Marina Herrera
Planning Division, Sonoma County Permit & Resource Management Department
2550 Ventura Ave
Santa Rosa, CA 95403

Re: AT&T Proposed Facility at 4515 Santa Rosa Avenue, Sonoma County file, UPE19-0083

Dear Ms. Herrera,

Monchamp Meldrum LLP represents AT&T Mobility ("AT&T") in its application to construct a new Intermediate Freestanding Commercial Telecommunication Facility ("Project") at 4515 Santa Rosa Avenue in the unincorporated area of the County of Sonoma ("County"). On May 19, 2021, the County Design Review Committee ("DRC") recommended the monopine design for the Project.

In anticipation of the June 17, 2021, County Planning Commission public hearing, this memorandum addresses legal issues raised in SBA Steel, LLC ("SBA") correspondence dated April 21, 2021 and SBA's appeal dated June 1, 2021.[1] SBA misrepresents that status of negotiations with AT&T and rehashes specious arguments that are fully addressed in AT&T's submitted materials.

A. SBA's Statements Regarding Negotiations With AT&T Are Misleading and Disingenuous.

Contrary to SBA's representations, negotiations have been exceedingly lacking in substance and it is in no way apparent "a deal can feasibly be reached in a matter of weeks." In its October 19, 2020, letter, SBA represented to the County that "SBA has communicated with the lessor for its tower, and has been assured that the present lease can be easily modified".

[1] With regard to SBA's procedural complaints about the May 19th Design Review Committee ("DRC") meeting, it is our understanding that, since SBA was participating as a member of the public and not as an applicant, appellant, or County staff, it was the Chair's prerogative regarding the use of the "share screen" Zoom feature. Additionally, since the DRC has recommended the monopine design, this memorandum does not address SBA's complaints about the water tank design.

Because of SBA's representations to the County, AT&T initiated discussions with SBA in November 2020 and submitted a formal application in December 2020.

After AT&T submitted several requests for a rent quote, SBA responded in January 2021 with, not a quote but rather "worst case scenario" pricing depending on the ground landlord's response. Follow-up correspondence consisted of AT&T asking for status updates for which SBA had little response. At the beginning of March, SBA stated: "Unfortunately, the owner has gone "radio silent" and hasn't responded to phone calls or emails over the last two weeks. Our attorney will be reaching out himself". An uncommunicative landlord necessitating attorney involvement does not engender any degree of optimism that a firm price quote is imminent. After no progress was made, AT&T communicated a final deadline of March 25th but received no response. Thereafter, AT&T submitted its revised materials to the County.

Over a week after AT&T's reasonable deadline, months after AT&T initially requested it, and only after AT&T resubmitted to the County, SBA finally provided a rent quote. This co-location would require additional County entitlements and significant site work and the quote was far more than AT&T would pay for the proposed site but nevertheless AT&T inquired as to some key lease terms and SBA offered very unfavorable response on numerous key terms. Given how long it has taken just to get a quote, the parties are not very close to an agreement and AT&T has concluded that negotiation of a lease for a co-location at the SBA site is infeasible.

B. AT&T Has Provided a Legally Compliant Visual Assessment With Ample Photo Simulations From an Expert for the County's Consideration

As part of its resubmittal, AT&T provided a Visual Assessment in compliance with County Code Section 26-64-040(c)(4) and the County's Guidelines, along with photo simulations and corresponding shot point maps. Now that the County Design Review Committee has recommended the monopine design, AT&T has revised its Visual Assessment to demonstrate the visual impact of the monopine design from 17 different vantage points. AT&T has also submitted the same simulations for the water tower[2] and monopole designs. The submitted materials include simulations directly contradicting SBA's comically exaggerated 'simulations.' Exhibit A to this letter shows a side-by-side comparison.

The Project Site is at the entrance to the North Rohnert Park Trail and, as shown the Visual Assessment, the structure would not be visible to trail users within 1000 feet of the entrance. By way of comparison, the industrial facility on the opposite side of the trail extends over 1200 feet from the entrance of the trail. As required by the County's Guidelines, AT&T's submitted photo simulations show the level of impact of the Project on trail users.

[2] Again, without citation to any section of the County Code, SBA rehashes its argument that a faux water tower design would require a variance because otherwise "the County would be largely powerless to stem the tide" of "unsightly" faux structures. SBA completely ignores the County's design review process, which the County has in place to address SBA's 'concerns.'

SBA also raises a concern about the cumulative visual impacts of the Project and SBA's tower. Visual Assessment includes the only vantage point where both towers have the potential to be visible [Viewpoint #17]. As the simulation clearly shows, the Project does not add any significant cumulative impact to the County's viewshed.

As SBA acknowledges, AT&T's submitted photo simulations are expert opinions and, as the saying goes, "a picture is worth a thousand words."

C. The Project Satisfies All of the Conditions Necessary to Make the Design Review and Use Permit Findings

Pursuant to County Code Section 26-82-050(b), for design review, the Planning Commission "shall endeavor to provide that the architectural and general appearance of […] structures and grounds are in keeping with the character of the neighborhood and are not detrimental to the orderly and harmonious development of the county and do not impair the desirability of investment or occupation in the neighborhood." As the Project's Visual Assessment demonstrates, the monopine design blends with the surrounding vegetation and does not detract from the scenic values of the area.

Pursuant to County Code Section 26-92-080(a), to approve a use permit, the Planning Commission must find "that the establishment, maintenance or operation of the use or building applied for will not under the circumstances of the particular case, be detrimental to the health, safety, peace, comfort or general welfare of persons residing or working in the neighborhood or to the general welfare of the area." As stated in the May 17, 2021, FirstNet Authority letter, the Project will include new radio access network infrastructure for first responders and public safety agencies "where that infrastructure has been currently lacking." The Project will improve cellular coverage for those living, working, and traveling through Sonoma County. The monopine design recommended by the County Design Review Committee will blend into the environment, reducing the Project's visual impact. The Project will not be detrimental to the health, safety, peace, comfort or general welfare of persons residing or working in the neighborhood or to the general welfare of the area.

D. Conclusion

As analyzed above, AT&T has submitted a legally-compliant Visual Assessment. The SBA site is not a feasible alternative site because SBA was unable to provide a firm and reasonable rental proposal within a reasonable amount of time. The Project meets the conditions necessary for the Planning Commission to make the design review and use permit findings. The

SBA correspondence does not raise any viable legal arguments that would impede the County from approving the Project.

Sincerely,

MONCHAMP MELDRUM LLP

Amanda Monchamp

Attachment: Side-By-Side Comparison

Cc:
Scott Orr, Planning Director, Sonoma County
Robert Pittman, County Counsel, Sonoma County
John di Bene, AT&T, Assistant Vice President, Senior Legal Counsel, AT&T

Viewpoint 1
200’ south of site on Roberts Lake Road

AT&T Simulation – 96’ monopine

SBA Simulation – 86’ monopole

Viewpoint 2
250’ south of site on Roberts Lake Road

AT&T Simulation – 96’ monopine

SBA Simulation – 86’ monopole

VIEW 2 | ROBERTS LAKE ROAD, APPROXIMATELY 250 FEET SOUTH OF PROJECT SITE

Viewpoint 3
600’ south of site

AT&T Simulation – 96’ monopine

SBA Simulation – 86’ monopole

Viewpoint 4
300’ west of site

AT&T Simulation – 96’ monopine

SBA Simulation – 86’ monopole

VISUAL ASSESSMENT (REVISION 3)
AT&T MOBILITY

Site Name: CCL06387 Santa Rosa Ave & Hwy 101
Location: 4515 Santa Rosa Avenue, Santa Rosa, CA 95407
APN: 045-041-034

Purpose of Study
The purpose of this study is to characterize the visual impacts associated with the new wireless telecommunication facility at 4515 Santa Rosa Avenue in the context of its environmental setting.

Project Description
AT&T Mobility proposes a new wireless telecommunications facility in unincorporated Sonoma County, to be located at 4515 Santa Rosa Avenue. Pursuant to the County Design Review Committee's May 19, 2021 direction, AT&T's proposed facility includes a 96' tall monopine-style tower within a 40' x 40' lease area surrounded by a chain link fence. AT&T's walk-up cabinet will also be enclosed within the fenced area. The lease area is set back about 85' from Hwy 101/Santa Rosa Avenue. The facility is placed adjacent to an existing billboard on the parcel and will hug the tree line to the north of the proposed facility to blend in with the landscape.

The proposed project site is currently located on a 21.5-acre parcel. The parcel is zoned DA (Diverse Agriculture) with combining districts for Riparian Corridor (RC 50/25), Scenic Resource (SR): Community Separator and Valley Oak Habitat (VOH). This parcel is adjacent to parcels with similar AR zoning designations as well as DA zoned parcels.

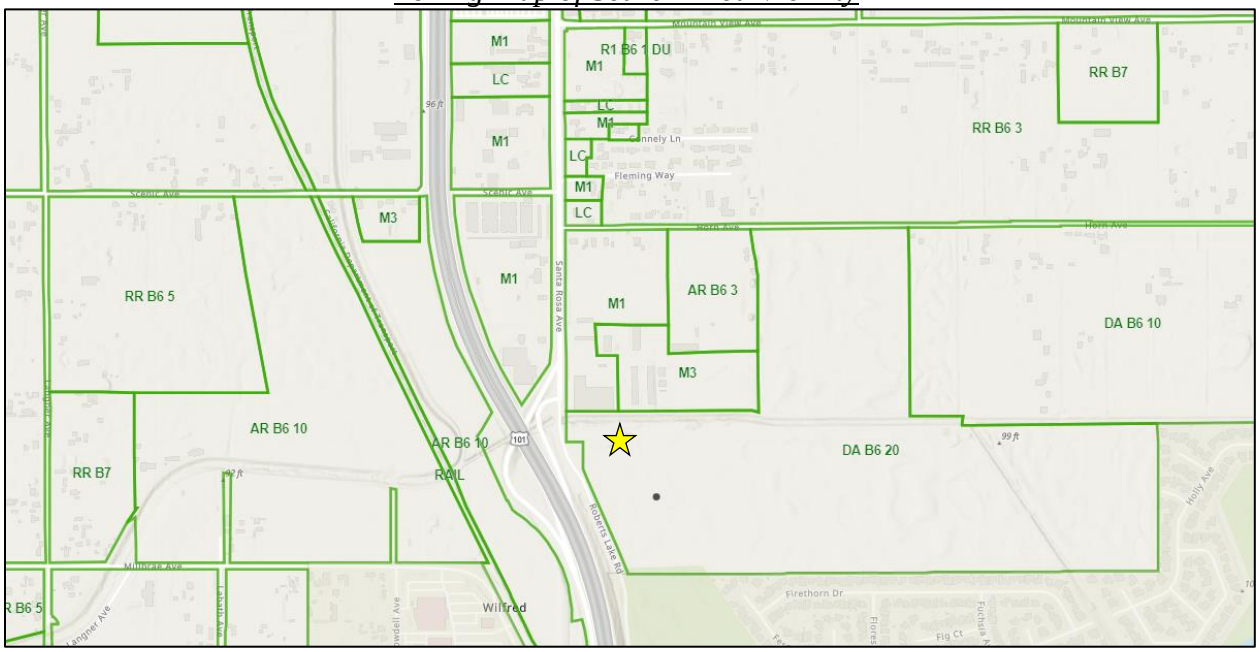
Environmental & Regulatory Setting
The site and surrounding area are subject to the following County regulations and policies:

A. DA Diverse Agricultural District (Art. 26-06)
B. SR Scenic Resource Combining District (Art. 26-64)
C. RC Riparian Corridor (Art. 26-65)
D. VOH Valley Oak Habitat (Art. 26-67)
E. AR Agricultural and Residential District (Art. 26-08)
F. M1 Limited Urban Industrial District (Art. 26-12)
G. M3 Limited Rural Industrial District (Art. 26-12)
H. LC Limited Commercial District (Art. 26-10)
I. RR Rural Residential (Art. 26-08)
J. Telecommunication Facilities Zoning Regulations (Sec. 26-88-130)
K. Design Review (Art. 26-82)

Zoning adjacent to the project site is:

North: M1 (Limited Urban Industrial District)/M3 (Limited Rural Industrial District)
East: DA (Diverse Agricultural District)
South: City of Rohnert Park
West: M1 (Limited Urban Industrial District)/AR (Agricultural and Residential District)

Zoning Map of Search Area Vicinity



Note: Yellow star denotes the proposed facility location.

Guidelines for Visual Impact Analysis

This section discusses the guidelines and description used to assess the level of visual impact. These guidelines are derived from County policies as well as other environmental guidelines used on other private projects in the County of Sonoma. Pursuant to County Code Section 26-64-040(c)(4), this Visual Assessment "identifies the potential visual impacts, at design capacity, of the proposed facility and its feasible alternatives" considering "views from public areas as well as from private residences" and assessing "the cumulative impacts of the proposed facility and other existing and foreseeable telecommunications facilities."

Determine View Sensitivity

Based on field data and characterizations of view toward the project site, the sensitivity level of the project site (Low, Moderate, High, or Maximum) was determined using criteria in the Sonoma County Visual Assessment Guidelines.[1] Visual sensitivity depends on such things as land use and zoning designation, character of development in the project vicinity, terrain characteristics and aesthetic value of existing vegetation. Sites with low visual sensitivity are, among other things, located within an urban land use designation and have no designations protecting scenic resources.

[1] https://sonomacounty.ca.gov/PRMD/Regulations/Environmental-Review-Guidelines/Visual-Assessment-Guidelines/

Sites with high or maximum sensitivity are, among other things, within General Plan designated scenic landscape units, community separators or scenic corridors.

Determine Visual Dominance
Using the County's Visual Assessment Guidelines, the visual dominance of the proposed project was determined first by evaluating the form, line, color and texture of project features within the visual context of its surroundings. Using this evaluation and the photo simulations of the project from three selected viewpoints, the project's visual dominance was defined according to the criteria contained in the County's Visual Assessment Guidelines. Potential classifications include Dominant, Co-Dominant, Subordinate, or Inevident, depending on a variety of different factors, including how visible the project will be, how strongly project elements stand out, how different they appear from the surrounding development in terms of character, mass, and scale and how much public attention they are likely to attract.

Determine Threshold of Significance for View Impacts
The determination of visual impact significance is made by correlating visual sensitivity with visual dominance in accordance with the Visual Assessment Guidelines. When the visual sensitivity of a site is classified as Maximum, any level of visual dominance greater than Inevident yields significant visual impacts. Conversely, when the visual sensitivity of a site is determined to be Low, visual impacts of even visually Dominant projects are considered less than significant.

Thresholds of Significance
The project would have a significant visual impact if the visual dominance of the proposed project exceeds that which is considered acceptable for the sensitivity level of the project as indicated in the Table below.

Sensitivity	**Visual Dominance**			
	Dominant	***Co-Dominant***	***Subordinate***	***Inevident***
Maximum	Significant	Significant	Significant	Less than Significant
High	Significant	Significant	Less than Significant	Less than Significant
Moderate	Significant	Less than Significant	Less than Significant	Less than Significant
Low	Less than Significant	Less than Significant	Less than Significant	Less than Significant

VISUAL ANALYSIS APPLIED TO AT&T SITE "CCL06387 SANTA ROSA AVE. & HWY 101"

Determine Viewpoints and Environmental Settings

Several roads in the surrounding area were driven in the vicinity of the project to determine at which spots the tower would be visible to the general public. The public viewpoint from which the proposed monopine will be most visible is along the Hwy 101/Santa Rosa Ave. It will be partially screened by the existing trees and existing billboard. The monopine will be about 85 feet from Hwy 101/Santa Rosa Ave.

Photographs and Photo Simulations to Illustrate Visual Impacts

Photographs were taken from the nearest offsite public vantage points. These appear below with photo simulations of the proposed monopine. The views include:

***Viewpoint 1*:** View from Roberts Lake Road looking north at the site.
***Viewpoint 2*:** View from Santa Rosa Avenue looking southeast at the site.
***Viewpoint 3*:** View from Horn Avenue looking southwest at site.
***Viewpoint 4*:** View from Millbrae Avenue looking northeast at the site.

Pursuant to County Code Section 26-64-040(c)(4), additional photographs were taken from along various public vantage points, including private residences, public parks and public trails. Additional viewpoints were included in response to submittals from SBA:

***Viewpoint 5*:** View from Roberts Lake Road looking northeast at the site. (Perspective matches SBA View #1)
***Viewpoint 6*:** View from Roberts Lake Road looking north at the site. (Perspective matches SBA View #2)
***Viewpoint 7*:** View from Roberts Lake Road looking northwest at site. (Perspective matches SBA View #3.)
***Viewpoint 8*:** View from Roberts Lake Road looking northeast at site. (Perspective matches SBA View #4.)
***Viewpoint 9*:** View from N. Rohnert Park Trail looking southwest at site.
***Viewpoint 10*:** View from N. Rohnert Park Trail looking southwest at site.
***Viewpoint 11*:** View from N. Rohnert Park Trail looking southwest at site.
***Viewpoint 12*:** View from Fescue Way looking northwest at site.
***Viewpoint 13*:** View from Firethorn Drive looking northwest at site.
***Viewpoint 14*:** View from Roberts Lake Park looking northwest at site.
***Viewpoint 15*:** View from Roberts Lake Park looking northwest at site.
***Viewpoint 16*:** View from N. Rohnert Park Trail looking south at site.
***Viewpoint 17*:** View from Roberts Lake Road looking north at site.

Viewpoint 1: *View from Roberts Lake Road looking north at the site.*

Sensitivity:	High
Visual Impact Significance:	Co-Dominant
Dominance:	Significant
Mitigation:	The monopine is colored to appear to be a native tree. The height as viewed from the road is similar to that of nearby trees and does not draw the eye because of existing utility-type structures and power lines in the area.

Discussion:
The photo simulation depicts the view of the proposed facility looking north from Roberts Lake Road looking north at the site.. The monopine is colored to appear to be a native tree and appears to be of a similar height to existing trees when viewed from the road. The equipment area is mostly hidden from public view from this vantage point by existing low-lying vegetation.

Viewpoint 2: *View from Santa Rosa Avenue looking southeast at the site.*

Sensitivity:	High
Visual Impact Significance:	Subordinate
Dominance:	Less than Significant
Mitigation:	The monopine is colored to appear to be a native tree and does not stand out from the other trees in the area in height, color, or form.

Discussion:
The photo simulation depicts the view of the proposed facility of the view looking southeast at the site from Hwy 101/Santa Rosa Ave. The monopine is colored to appear to be a native tree, is visible from the road and appears to blend in with the existing trees along the right-of-way. The power lines along the roadway are the main visual component in this view. The equipment area will be hidden from public view from this vantage point.

***Viewpoint 3*:** View from Horn Avenue looking southwest at site.

Sensitivity:	High
Visual Impact Significance:	Subordinate
Dominance:	Less than Significant
Mitigation:	The monopine is colored to appear to be a native tree and does not stand out from the other trees in the area in height, color, or form. It is also set back from the road and barely visible in this view.

Discussion:
The photo simulation depicts the view of the proposed facility looking southwest from Horn Avenue. The monopine design blends in with the height of existing trees on the site and nearby parcels and appears to be shorter than the majority of the trees when viewed from the road. The equipment area will be hidden from public view from this vantage point.

Viewpoint 4: *View from Millbrae Avenue looking northeast at the site.*

Sensitivity:	High
Visual Impact Significance:	Subordinate
Dominance:	Less than Significant
Mitigation:	The monopine is colored to appear to be a native tree and does not stand out from the other trees in the area in height, color, or form. It is also set back from the road and barely visible in this view.

Discussion:
The photo simulation depicts the view of the proposed facility looking northeast from Millbrae Avenue. The monopine design blends in with the height of existing trees on the site and nearby parcels and appears to be shorter than the majority of the vegetation when viewed from the road. The equipment area will be hidden from public view from this vantage point.

***Viewpoint 5*:** View from Roberts Lake Road looking northeast at the site. (Perspective matches SBA View #1)

Sensitivity:	High
Visual Impact Significance:	Co-Dominant
Dominance:	Significant
Mitigation:	The tower has been stealthed as a monopine and colored to appear to be a native tree to blend in with the existing vegetation around the proposed facility.

Discussion:
The photo simulation depicts the view of the proposed facility looking northeast from Roberts Lake Road. The monopine is 96' tall overall and the photo is taken at approximately 200' from the site. The monopine is colored to appear to be a native tree. The ground equipment is effectively screened by the existing vegetation. However, the antennas on a telecommunications facility must be able to clear existing structures and vegetation to provide coverage to an area, which requires the facility to be taller than the trees around it.

***Viewpoint 6*:** View from Roberts Lake Road looking north at the site. (Perspective matches SBA View #2)

Sensitivity:	High
Visual Impact Significance:	Co-Dominant
Dominance:	Significant
Mitigation:	The tower has been stealthed as a monopine and colored to appear to be a native tree to blend in with the existing vegetation around the proposed facility.

Discussion:
The photo simulation depicts the view of the proposed facility looking north from Roberts Lake Road at approximately 250' from the site. The monopine design is tall but blends in with the height and color of existing trees on the site and nearby parcels. The equipment area is not visible from public view from this vantage point.

***Viewpoint 7*:** View from Roberts Lake Road looking northwest at site. (Perspective matches SBA View #3.)

Sensitivity:	High
Visual Impact Significance:	Co-Dominant
Dominance:	Significant
Mitigation:	The tower has been stealthed as a monopine and colored to appear to be a native tree to blend in with the existing vegetation around the proposed facility.

Discussion:
The photo simulation depicts the view of the proposed facility looking north from just inside the fence line of the subject parcel at approximately 600’ from the site. The monopine design is tall but blends in with the height and color of existing trees on the site and nearby parcels. The equipment area is not visible from public view from this vantage point.

***Viewpoint 8*:** View from Roberts Lake Road looking northeast at site. (Perspective matches SBA View #4.)

Sensitivity:	High
Visual Impact Significance:	Co-Dominant
Dominance:	Significant
Mitigation:	The tower has been stealthed as a monopine and colored to appear to be a native tree to blend in with the existing vegetation around the proposed facility.

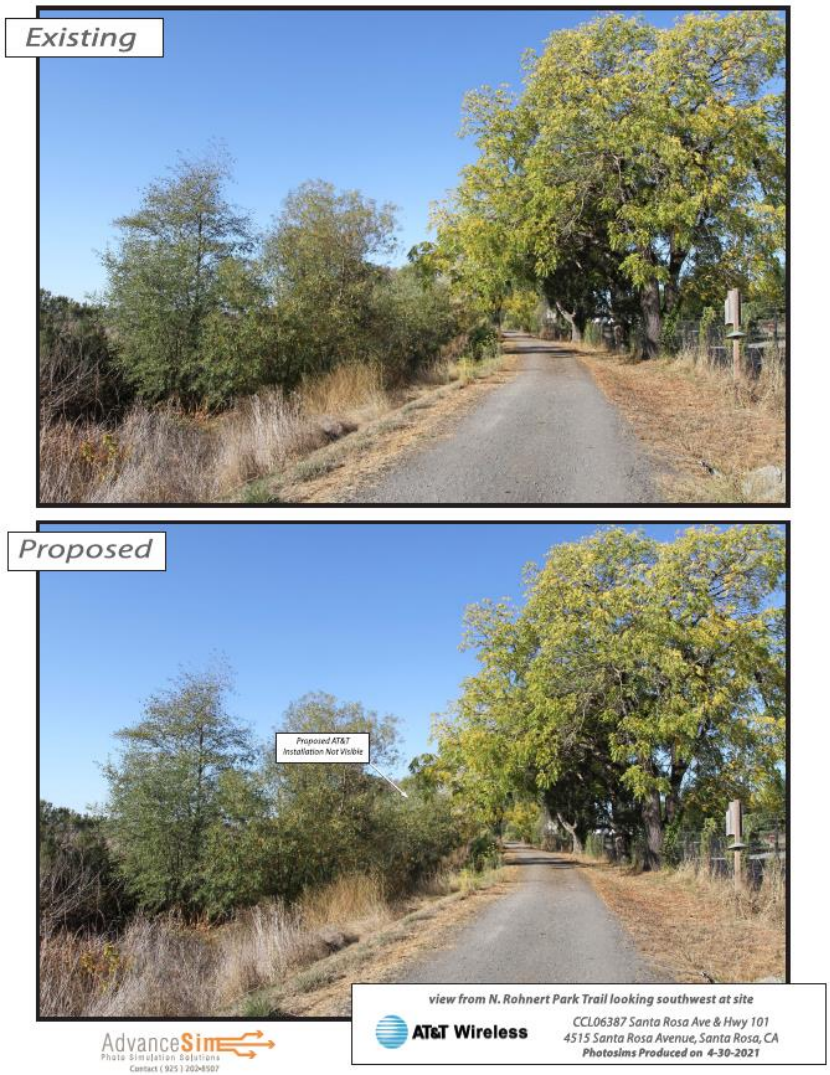
Discussion:
The photo simulation depicts the view of the proposed facility looking northeast from the Hwy 101 off ramp approximately 300' from the site. The monopine design is tall but blends in with the height and color of existing trees on the site and nearby parcels. The equipment area is not visible from public view from this vantage point.

***Viewpoint 9*:** View from N. Rohnert Park Trail looking southwest at site.

Sensitivity:	High
Visual Impact Significance:	Subordinate
Dominance:	Less than Significant
Mitigation:	The monopine is colored to appear to be a native tree and does not stand out from the other trees in the area in height, color, or form. It is also screened by existing vegetation along the trail.

Discussion:
The photo simulation depicts the view of the proposed facility looking southwest from North Rohnert Park Trail approximately 400' from the site. The monopine design blends in with the height and color of existing trees along the North Rohnert Park Trail and only the top of the tree, or "crown," is visible to the public. The equipment area is not visible from public view.

***Viewpoint 10*:** View from N. Rohnert Park Trail looking southwest at site.



Sensitivity:	High
Visual Impact Significance:	Inevident
Dominance:	Less than Significant
Mitigation:	The monopine is not visible.

Discussion:
The photo simulation depicts the view of the proposed facility looking southwest from North Rohnert Park Trail approximately 1,000' from the site. The monopine design is not visible amongst the existing tree thickets alongside the trail.

***Viewpoint 11*:** View from N. Rohnert Park Trail looking southwest at site.

Sensitivity:	High
Visual Impact Significance:	Inevident
Dominance:	Less than Significant
Mitigation:	The monopine is not visible.

Discussion:
The photo simulation depicts the view of the proposed facility looking southwest from North Rohnert Park Trail approximately 0.5 miles from the site. The monopine design is not visible amongst the existing tree thickets alongside the trail.

***Viewpoint 12*:** View from Fescue Way looking northwest at site.

Sensitivity:	High
Visual Impact Significance:	Inevident
Dominance:	Less than Significant
Mitigation:	The monopine is not visible.

Discussion:
The photo simulation depicts the view of the proposed facility looking northwest from the nearest residence along Fescue Way. The monopine design is not visible.

***Viewpoint 13*:** View from Firethorn Drive looking northwest at site.

Sensitivity:	High
Visual Impact Significance:	Inevident
Dominance:	Less than Significant
Mitigation:	The monopine is not visible.

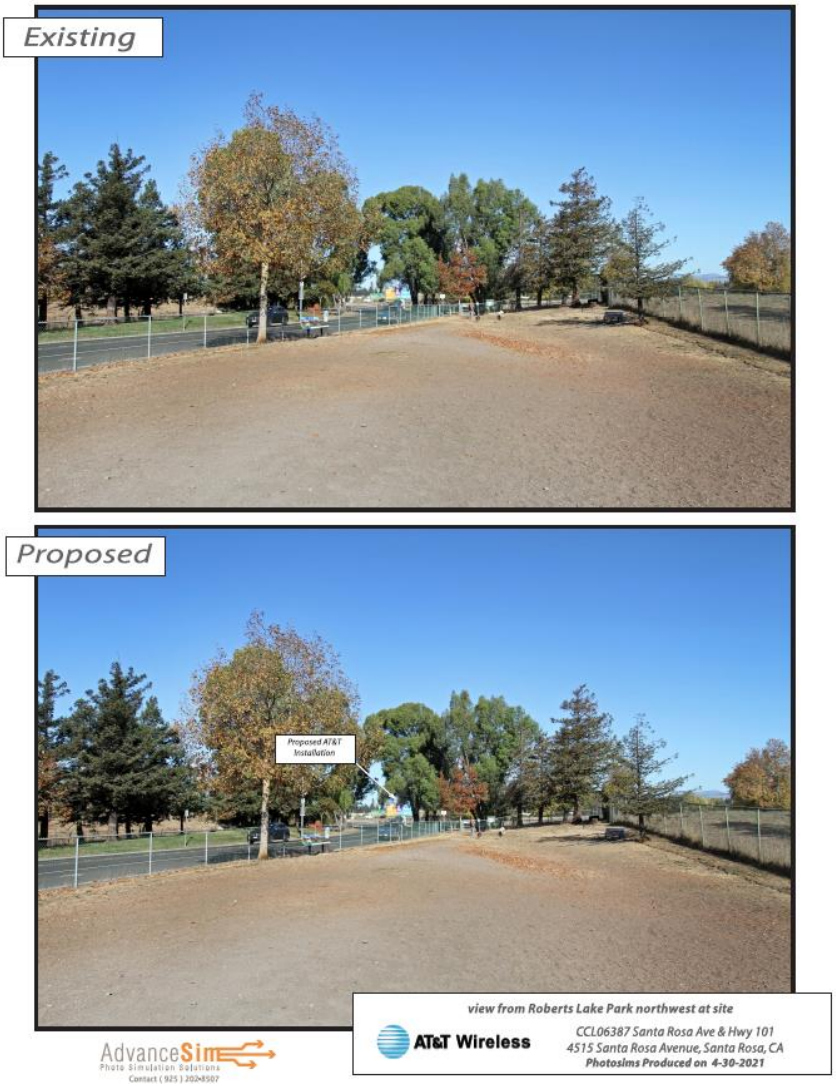
Discussion:
The photo simulation depicts the view of the proposed facility looking northwest from the nearest residence along Firethorn Drive. The monopine design is not visible.

***Viewpoint 14*:** View from Roberts Lake Park looking northwest at site.

Sensitivity:	High
Visual Impact Significance:	Subordinate
Dominance:	Less than Significant
Mitigation:	The monopine is colored to appear to be a native tree and does not stand out from the other trees in the area in height, color, or form. It can only be seen from a gap in the trees along Roberts Lake Road.

Discussion:
The photo simulation depicts the view of the proposed facility looking northwest from Roberts Lake Park. The monopine design blends in with the height and color of existing trees on the site and nearby parcels and appears to be shorter than trees when viewed from the road. The facility can only be seen from a gap in the trees along Roberts Lake Road. The equipment area will be hidden from public view from this vantage point.

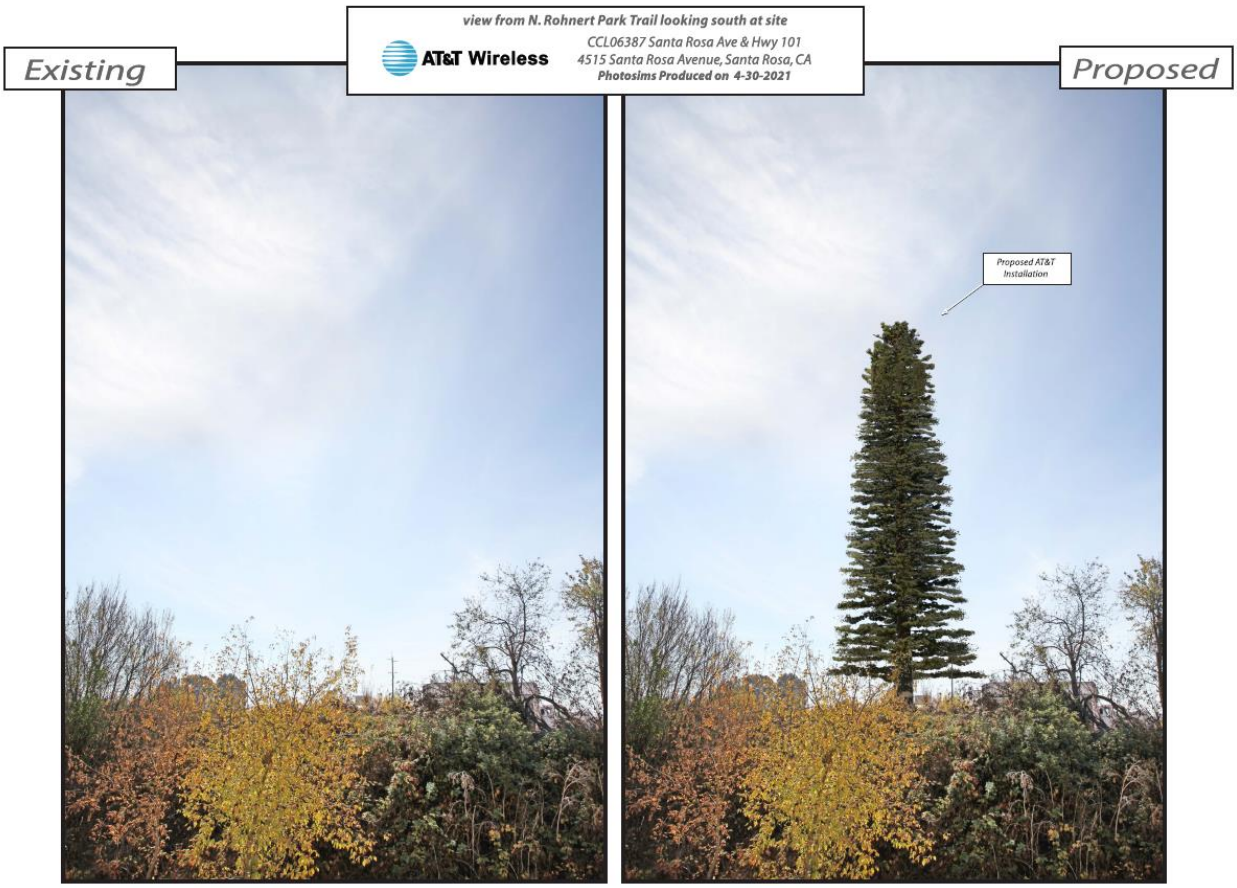
***Viewpoint 15*:** View from Roberts Lake Park looking northwest at site.



Sensitivity:	High
Visual Impact Significance:	Inevident
Dominance:	Less than Significant
Mitigation:	The monopine is colored to appear to be a native tree and cannot be seen amongst the existing trees along Roberts Lake Road.

Discussion:
The photo simulation depicts the view of the proposed facility looking northwest from Roberts Lake Road. The photo was taken from within Roberts Lake Park. The monopine is hidden in this view due to existing trees that line the public right-of-way.

***Viewpoint 16*:** View from N. Rohnert Park Trail looking south at site.



Sensitivity:	High
Visual Impact Significance:	Dominant
Dominance:	Significant
Mitigation:	The tower has been stealthed as a monopine and colored to appear to be a native tree to blend in with the existing vegetation around the proposed facility.

Discussion:
The photo simulation depicts the view of the proposed facility looking south approximately 100' from the proposed site. The 96' tall monopine would be a prominent structure in a photo taken from a short distance away. The existing vegetation will screen all ground equipment and most of the monopine's trunk. However, the antennas on a telecommunications facility must be able to clear existing structures and vegetation to provide coverage to an area, which requires the facility to be taller than the trees around it. Though taller than the vegetation in the foreground, the monopine design blends in with the overall existing landscape.

***Viewpoint 17*:** View from Roberts Lake Road looking north at site.

Sensitivity:	High
Visual Impact Significance:	Co-Dominant
Dominance:	Significant
Mitigation:	The monopine is colored to appear to be a native tree. The height as viewed from the road is like that of nearby trees and does not draw the eye because of existing utility-type structures and power lines in the area.

Discussion:
The photo simulation depicts the view of the proposed facility looking north from Roberts Lake Road. The monopine is colored to appear to be a native tree and appears to be of a similar height to existing trees when viewed from the road. The equipment area is hidden from public view from this vantage point by existing low-lying vegetation. In addition to the tall trees in the background, there are existing utility lines and tall power poles that run alongside Roberts Lake Road in the foreground that further lessens any visual impact of AT&T's proposed monopine. This vantage point includes both the SBA tower and the proposed facility. However, given that both facilities are stealthed as monopines and the view includes industrial/commercial activities and existing utility lines and power poles, the cumulative impact of both towers does not detract from the scenic resources of the area.

SITE NUMBER: CCL06387
SITE NAME: SANTA ROSA AVE & HWY 101 - SANTA ROSA HORN INVESTORS

FA CODE: 14728240
USID#: 261515

4515 SANTA ROSA AVENUE
SANTA ROSA, CA 95407
JURISDICTION: SONOMA COUNTY
APN: 045-041-034

SITE TYPE: PREMANUFACTURED WALK-IN CABINET / MONOPINE

PROJECT DESCRIPTION

NEW SITE BUILD UNMANNED TELECOMMUNICATIONS FACILITY.

1. BRING POWER / TELCO / FIBER TO SITE LOCATION.
2. INSTALL AT&T APPROVED PREMANUFACTURED WALK-IN CABINET AND ASSOCIATED INTERIOR EQUIPMENT.
3. ADD STANDBY GENERATOR WITH FUEL TANK.
4. PROPOSED AT&T MONOPINE WITH ANTENNAS & ASSOCIATED TOWER-MOUNTED EQUIPMENT.
5. PROPOSED AT&T GPS ANTENNA.

PROJECT INFORMATION

PROPERTY INFORMATION:

SITE NAME:	SANTA ROSA AVE & HWY 101 - SANTA ROSA HORN INVESTORS
SITE NUMBER:	CCL06387
SITE ADDRESS:	4515 SANTA ROSA AVENUE SANTA ROSA, CA 95407
A.P.N. NUMBER:	045-041-034
CURRENT ZONING:	DIVERSE AGRICULTURAL (DA)
JURISDICTION:	SONOMA COUNTY
LATITUDE:	N38° 22' 18.97" NAD 83
LONGITUDE:	W122° 42' 46.36" NAD 83
GROUND ELEVATION:	99 FT. AMSL

PROPERTY OWNER:
SANTA ROSA HORN INVESTORS LLC
422 LARKFIELD CTR. #102
SANTA ROSA, CA 95403

PROJECT TEAM

APPLICANT / LESSEE:
AT&T
2600 CAMINO RAMON
SAN RAMON, CA 94583

RF ENGINEER:
AT&T
5555 E. OLIVE AVENUE
FRESNO, CA. 93727
CONTACT: AMRITPAL SINGH
EMAIL: as230b@att.com
PH: (817) 966-7271

SURVEYOR:
GEIL ENGINEERING
1226 HIGH STREET
AUBURN, CA 95603
CONTACT: DAN GEIL
PH: (530) 885-0426

ARCHITECT / ENGINEER:
MST ARCHITECTS INC.
1520 RIVER PARK DRIVE
SACRAMENTO, CA 95815
CONTACT: MANUEL S. TSIHLAS
EMAIL: manuel@mstarchitects.com
PH: (916) 567-9630

SITE AQUISITION:
COMPLETE WIRELESS CONSULTING, INC.
2009 V STREET
SACRAMENTO, CA 95818
CONTACT: ROCKY CORDOVA
EMAIL: rcordova@completewireless.net
PH: (916) 616-0468

ZONING MANAGER:
COMPLETE WIRELESS CONSULTING, INC.
2009 V STREET
SACRAMENTO, CA 95818
CONTACT: MARIA KIM
EMAIL: mkim@completewireless.net
PH: (916) 247-6087

CIVIL VENDOR:
VINCULUMS
1200 DEL PASO ROAD STE 150
SACRAMENTO, CA 95834
CONTACT: FLOYD GREEN
EMAIL: fgreen@vinculums.com
PH: (480) 528-1927

SHEET INDEX

CODE COMPLIANCE

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUED TO PERMIT WORK NOT CONFORMING TO THESE CODES.

1) 2016 CALIFORNIA ADMINISTRATIVE CODE, CHAPTER 10, PART 1, TITLE 24 CODE OF REGULATIONS
2) 2016 CALIFORNIA BUILDING CODE (CBC) WITH CALIFORNIA AMENDMENTS, BASED ON THE 2015 IBC (PART 2, VOL 1-2)
3) 2016 CALIFORNIA RESIDENTIAL CODE (CRC) WITH APPENDIX H, PATIO COVERS, BASED ON THE 2015 IRC (PART 2.5)
4) 2016 CALIFORNIA GREEN BUILDINGS STANDARDS CODE (CALGREEN) (PART 11) (AFFECTED ENERGY PROVISIONS ONLY)
5) 2016 CALIFORNIA FIRE CODE (CFC), BASED ON THE 2015 IFC, WITH CALIFORNIA AMENDMENTS (PART 9)
6) 2016 CALIFORNIA MECHANICAL CODE (CMC), BASED ON THE 2015 UMC (PART 4)
7) 2016 CALIFORNIA PLUMBING CODE (CPC), BASED ON THE 2015 UPC (PART 5)
8) 2016 CALIFORNIA ELECTRICAL CODE (CEC) WITH CALIFORNIA AMENDMENTS, BASED ON THE 2015 NEC (PART 3)
9) 2016 CALIFORNIA ENERGY CODE (CEC)
10) ANSI / EIA-TIA-222-G
11) 2015 NFPA 101, LIFE SAFETY CODE
12) 2016 NFPA 72, NATIONAL FIRE ALARM CODE
13) 2016 NFPA 13, FIRE SPRINKLER CODE

OCCUPANCY AND CONSTRUCTION TYPE

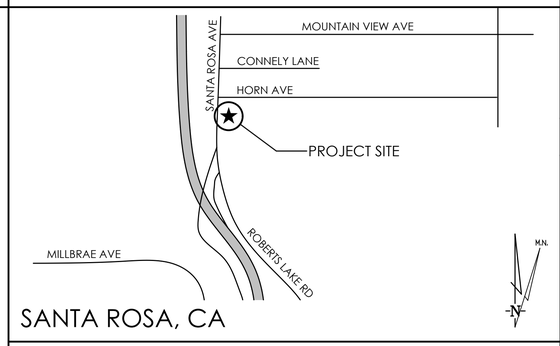
OCCUPANCY : S-2 (UNMANNED TELECOMMUNICATIONS FACILITY), U (TOWER)

CONSTRUCTION TYPE: V-B

HANDICAP REQUIREMENTS

FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION, ACCESSIBILITY ACCESS AND REQUIREMENTS ARE NOT REQUIRED, IN ACCORDANCE WITH CALIFORNIA STATE ADMINISTRATIVE CODE, PART 2, TITLE 24, SECTION 1103B.1, EXCEPTION 1 & SECTION 1134B.2.1, EXCEPTION 4.

VICINITY MAP



SANTA ROSA, CA

DIRECTIONS FROM AT&T

DIRECTIONS FROM AT&T's OFFICE AT 2600 CAMINO RAMON, SAN RAMON, CA

1. MERGE ONTO I-680 NORTH
2. CONTINUE ON I-680 NORTH
3. TAKE EXIT 58A ONTO I-780 WEST
4. CONTINUE ONTO CURTOLA PARKWAY
5. CONTINUE ONTO MARE ISLAND WAY
6. TURN LEFT ONTO MARE ISLAND CAUSEWAY
7. TURN RIGHT ONTO RAILROAD AVENUE
8. TURN LEFT AND THEN RIGHT TO MERGE ONTO SEARS POINT ROAD / CA-37 WEST
9. TURN RIGHT ONTO LAKEVILLE HIGHWAY
10. TURN RIGHT TO MERGE ONTO US-101 NORTH
11. CONTINUE ON US-101 NORTH
12. TAKE EXIT 484B ONTO ROBERTS LAKE ROAD
13. TURN RIGHT ONTO ROBERTS LAKE ROAD
14. TURN LEFT ONTO SITE ACCESS ROAD, SITE WILL BE STRAIGHT AHEAD

APPROVALS

APPROVED BY:	INITIALS:	DATE:
AT&T:		
VENDOR:		
R.F.:		
LEASING / LANDLORD:		
ZONING:		
CONSTRUCTION:		
POWER / TELCO:		
PG&E:		

GENERAL CONTRACTOR NOTES

DO NOT SCALE DRAWINGS

THESE DRAWINGS ARE FORMATTED TO BE FULL SIZE AT 24" x 36". CONTRACTOR SHALL VERIFY ALL PLANS AND EXISTING DIMENSIONS AND CONDITIONS ON THE JOBSITE AND SHALL IMMEDIATELY NOTIFY THE ARCHITECT/ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR MATERIAL ORDERS OR BE RESPONSIBLE FOR THE SAME.

DIGALERT
800-227-2600
Call 2 Full Working Days In Advance

Issued For:
CCL06387
SANTA ROSA AVE & HWY 101 - SANTA ROSA HORN INVESTORS

4515 SANTA ROSA AVENUE
SANTA ROSA, CA 95407

PREPARED FOR
at&t
2600 Camino Ramon
San Ramon, California 94583

Vendor:
COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL06387
PROJECT NO:	162.2573
DRAWN BY:	TLS
CHECKED BY:	SV

REV	DATE	DESCRIPTION
	10/31/19	100% ZD
	09/20/19	90% ZD

Licensee:

Architect:
MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
TITLE SHEET

SHEET NUMBER:
T-1

GENERAL CONSTRUCTION NOTES:

1. PLANS ARE INTENDED TO BE DIAGRAMMATIC OUTLINE ONLY, UNLESS NOTED OTHERWISE. THE WORK SHALL INCLUDE FURNISHING MATERIALS, EQUIPMENT, APPURTENANCES AND LABOR NECESSARY TO COMPLETE ALL INSTALLATIONS AS INDICATED ON THE DRAWINGS.

2. THE CONTRACTOR SHALL OBTAIN, IN WRITING, AUTHORIZATION TO PROCEED BEFORE STARTING WORK ON ANY ITEM NOT CLEARLY DEFINED OR IDENTIFIED BY THE CONTRACT DOCUMENTS.

3. CONTRACTOR SHALL CONTACT USA (UNDERGROUND SERVICE ALERT) AT (800) 227-2600, FOR UTILITY LOCATIONS, 48 HOURS BEFORE PROCEEDING WITH ANY EXCAVATION, SITE WORK OR CONSTRUCTION.

4. THE CONTRACTOR SHALL INSTALL ALL EQUIPMENT AND MATERIALS IN ACCORDANCE WITH MANUFACTURER'S RECOMMENDATIONS UNLESS SPECIFICALLY INDICATED OTHERWISE, OR WHERE LOCAL CODES OR REGULATIONS TAKE PRECEDENCE.

5. ALL CONSTRUCTION SHALL BE IN ACCORDANCE WITH THE CBC / UBC'S REQUIREMENTS REGARDING EARTHQUAKE RESISTANCE, FOR, BUT NOT LIMITED TO, PIPING, LIGHT FIXTURES, CEILING GRID, INTERIOR PARTITIONS, AND MECHANICAL EQUIPMENT. ALL WORK MUST COMPLY WITH LOCAL EARTHQUAKE CODES AND REGULATIONS.

6. REPRESENTATIONS OF TRUE NORTH, OTHER THAN THOSE FOUND ON THE PLOT OF SURVEY DRAWINGS, SHALL NOT BE USED TO IDENTIFY OR ESTABLISH BEARING OF TRUE NORTH AT THE SITE. THE CONTRACTOR SHALL RELY SOLELY ON THE PLOT OF SURVEY DRAWING AND ANY SURVEYOR'S MARKINGS AT THE SITE FOR THE ESTABLISHMENT OF TRUE NORTH, AND SHALL NOTIFY THE ARCHITECT / ENGINEER PRIOR TO PROCEEDING WITH THE WORK IF ANY DISCREPANCY IS FOUND BETWEEN THE VARIOUS ELEMENTS OF THE WORKING DRAWINGS AND THE TRUE NORTH ORIENTATION AS DEPICTED ON THE CIVIL SURVEY. THE CONTRACTOR SHALL ASSUME SOLE LIABILITY FOR ANY FAILURE TO NOTIFY THE ARCHITECT / ENGINEER.

7. THE BUILDING DEPARTMENT ISSUING THE PERMITS SHALL BE NOTIFIED AT LEAST TWO WORKING DAYS PRIOR TO THE COMMENCEMENT OF WORK, OR AS OTHERWISE STIPULATED BY THE CODE ENFORCEMENT OFFICIAL HAVING JURISDICTION.

8. DO NOT EXCAVATE OR DISTURB BEYOND THE PROPERTY LINES OR LEASE LINES, UNLESS OTHERWISE NOTED.

9. ALL EXISTING UTILITIES, FACILITIES, CONDITIONS, AND THEIR DIMENSIONS SHOWN ON THE PLAN HAVE BEEN PLOTTED FROM AVAILABLE RECORDS. THE ARCHITECT / ENGINEER AND THE OWNER ASSUME NO RESPONSIBILITY WHATSOEVER AS TO THE SUFFICIENCY OR THE ACCURACY OF THE INFORMATION SHOWN ON THE PLANS, OR THE MANNER OF THEIR REMOVAL OR ADJUSTMENT. CONTRACTORS SHALL BE RESPONSIBLE FOR DETERMINING EXACT LOCATION OF ALL EXISTING UTILITIES AND FACILITIES PRIOR TO START OF CONSTRUCTION. CONTRACTORS SHALL ALSO OBTAIN FROM EACH UTILITY COMPANY DETAILED INFORMATION RELATIVE TO WORKING SCHEDULES AND METHODS OF REMOVING OR ADJUSTING EXISTING UTILITIES.

10. CONTRACTOR SHALL VERIFY ALL EXISTING UTILITIES, BOTH HORIZONTAL AND VERTICALLY, PRIOR TO THE START OF CONSTRUCTION. ANY DISCREPANCIES OR DOUBTS AS TO THE INTERPRETATION OF PLANS SHOULD BE IMMEDIATELY REPORTED TO THE ARCHITECT / ENGINEER FOR RESOLUTION AND INSTRUCTION, AND NO FURTHER WORK SHALL BE PERFORMED UNTIL THE DISCREPANCY IS CHECKED AND CORRECTED BY THE ARCHITECT / ENGINEER. FAILURE TO SECURE SUCH INSTRUCTION MEANS CONTRACTOR WILL HAVE WORKED AT HIS/HER OWN RISK AND EXPENSE.

11. ALL NEW AND EXISTING UTILITY STRUCTURES ON SITE AND IN AREAS TO BE DISTURBED BY CONSTRUCTION SHALL BE ADJUSTED TO FINISH ELEVATIONS PRIOR TO FINAL INSPECTION OF WORK.

12. ANY DRAIN AND/OR FIELD TILE ENCOUNTERED / DISTURBED DURING CONSTRUCTION SHALL BE RETURNED TO IT'S ORIGINAL CONDITION PRIOR TO COMPLETION OF WORK. SIZE, LOCATION AND TYPE OF ANY UNDERGROUND UTILITIES OR IMPROVEMENTS SHALL BE ACCURATELY NOTED AND PLACED ON "AS-BUILT" DRAWINGS BY GENERAL CONTRACTOR, AND ISSUED TO THE ARCHITECT / ENGINEER AT COMPLETION OF PROJECT.

13. ALL TEMPORARY EXCAVATIONS FOR THE INSTALLATION OF FOUNDATIONS, UTILITIES, ETC., SHALL BE PROPERLY LAID BACK OR BRACED IN ACCORDANCE WITH CORRECT OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) REQUIREMENTS.

14. INCLUDE MISC. ITEMS PER AT&T SPECIFICATIONS

APPLICABLE CODES, REGULATIONS AND STANDARDS:

SUBCONTRACTOR'S WORK SHALL COMPLY WITH ALL APPLICABLE NATIONAL, STATE, AND LOCAL CODES AS ADOPTED BY THE LOCAL AUTHORITY HAVING JURISDICTION (AHJ) FOR THE LOCATION.

THE EDITION OF THE AHJ ADOPTED CODES AND STANDARDS IN EFFECT ON THE DATE OF CONTRACT AWARD SHALL GOVERN THE DESIGN.

SUBCONTRACTOR'S WORK SHALL COMPLY WITH THE LATEST EDITION OF THE FOLLOWING STANDARDS:

- AMERICAN CONCRETE INSTITUTE (ACI) 318, BUILDING CODE REQUIREMENTS FOR STRUCTURAL CONCRETE
- AMERICAN INSTITUTE OF STEEL CONSTRUCTION (AISC), MANUAL OF STEEL CONSTRUCTION, ASD, NINTH EDITION
- TELECOMMUNICATIONS INDUSTRY ASSOCIATION (TIA) 222-G, STRUCTURAL STANDARD FOR STRUCTURAL ANTENNA TOWER AND ANTENNA SUPPORTING STRUCTURES
- INSTITUTE FOR ELECTRICAL AND ELECTRONICS ENGINEERS (IEEE) 81, GUIDE FOR MEASURING EARTH RESISTIVITY, GROUND IMPEDANCE, AND EARTH SURFACE POTENTIALS OF A GROUND SYSTEM IEEE 1100 (1999) RECOMMENDED PRACTICE FOR POWERING AND GROUNDING OF ELECTRICAL EQUIPMENT.
-IEEE C62.41, RECOMMENDED PRACTICES ON SURGE VOLTAGES IN LOW VOLTAGE AC POWER CIRCUITS (FOR LOCATION CATEGORY "C3" AND "HIGH SYSTEM EXPOSURE")

TIA 607 COMMERCIAL BUILDING GROUNDING AND BONDING REQUIREMENTS FOR TELECOMMUNICATIONS TELCORDIA GR-63 NETWORK EQUIPMENT-BUILDING SYSTEM (NEBS): PHYSICAL PROTECTION
TELCORDIA GR-347 CENTRAL OFFICE POWER WIRING
TELCORDIA GR-1275 GENERAL INSTALLATION REQUIREMENTS
TELCORDIA GR-1503 COAXIAL CABLE CONNECTIONS

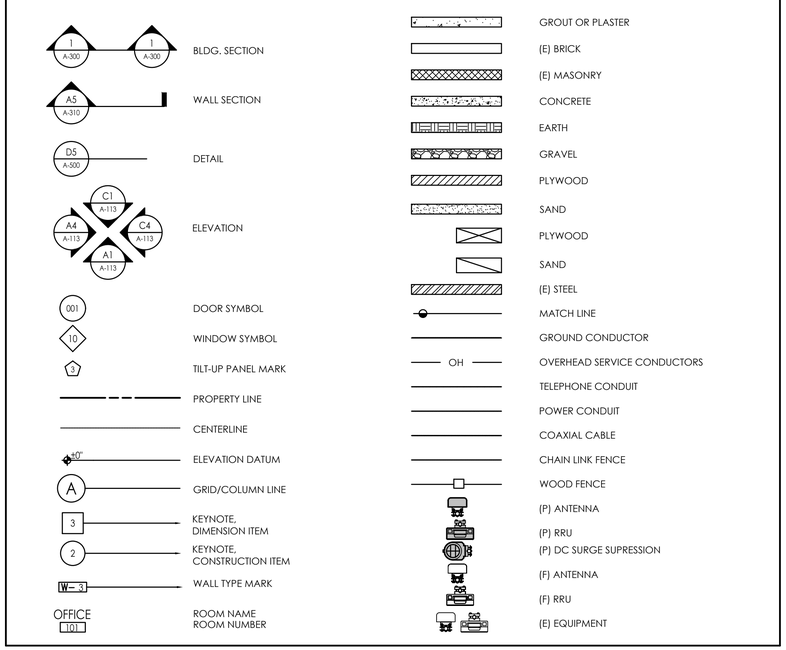
ANY AND ALL OTHER LOCAL & STATE LAWS AND REGULATIONS

FOR ANY CONFLICTS BETWEEN SECTIONS OF LISTED CODES AND STANDARDS REGARDING MATERIAL, METHODS OF CONSTRUCTION, OR OTHER REQUIREMENTS, THE MOST RESTRICTIVE SHALL GOVERN. WHERE THERE IS CONFLICT BETWEEN A GENERAL REQUIREMENT AND A SPECIFIC REQUIREMENT, THE SPECIFIC REQUIREMENT SHALL GOVERN.

ABBREVIATIONS

A.B.	ANCHOR BOLT
ABV.	ABOVE
ACCA	ANTENNA CABLE COVER ASSEMBLY
ADD'L	ADDITIONAL
A.F.F.	ABOVE FINISHED FLOOR
A.F.G.	ABOVE FINISHED GRADE
ALUM.	ALUMINUM
ALT.	ALTERNATE
ANT.	ANTENNA
APPRX.	APPROXIMATE(LY)
ARCH.	ARCHITECT(URAL)
AWG.	AMERICAN WIRE GAUGE
BLDG.	BUILDING
BLK.	BLOCK
BLKG.	BLOCKING
BM.	BEAM
B.N.	BOUNDARY NAILING
BTCW.	BARE TINNED COPPER WIRE
B.O.F.	BOTTOM OF FOOTING
B/U	BACK-UP CABINET
CAB.	CABINET
CANT.	CANTILEVER(ED)
C.I.P.	CAST IN PLACE
CLG.	CEILING
CLR.	CLEAR
COL.	COLUMN
CONC.	CONCRETE
CONN.	CONNECTION(OR)
CONST.	CONSTRUCTION
CONT.	CONTINUOUS
d	PENNY (NAILS)
DBL.	DOUBLE
DEPT.	DEPARTMENT
D.F.	DOUGLAS FIR
DIA.	DIAMETER
DIAG.	DIAGONAL
DIM.	DIMENSION
DWG.	DRAWING(S)
DWL.	DOWEL(S)
EA.	EACH
EL.	ELEVATION
ELEC.	ELECTRICAL
ELEV.	ELEVATOR
EMT.	ELECTRICAL METALLIC TUBING
E.N.	EDGE NAIL
ENG.	ENGINEER
EQ.	EQUAL
EXP.	EXPANSION
EXST.(E)	EXISTING
EXT.	EXTERIOR
FAB.	FABRICATION(OR)
F.F.	FINISH FLOOR
F.G.	FINISH GRADE
FIN.	FINISH(ED)
FLR.	FLOOR
FDN.	FOUNDATION
F.O.C.	FACE OF CONCRETE
F.O.M.	FACE OF MASONRY
F.O.S.	FACE OF STUD
F.O.W.	FACE OF WALL
F.S.	FINISH SURFACE
FT.(')	FOOT (FEET)
FTG.	FOOTING
G.	GROWTH (CABINET)
GA.	GAUGE
GI.	GALVANIZE(D)
G.F.I.	GROUND FAULT CIRCUIT INTERRUPTER
GLB. (GLU-LAM)	GLUE LAMINATED BEAM
GPS	GLOBAL POSITIONING SYSTEM
GRND.	GROUND
HDR.	HEADER
HGR.	HANGER
HT.	HEIGHT
ICGB.	ISOLATED COPPER GROUND BUS
IN. (")	INCH(ES)
INT.	INTERIOR
LB.(#)	POUND(S)
L.B.	LAG BOLTS
L.F.	LINEAR FEET (FOOT)
L.	LONG(ITUDINAL)
MAS.	MASONRY
MAX.	MAXIMUM
M.B.	MACHINE BOLT
MECH.	MECHANICAL
MFR.	MANUFACTURER
MIN.	MINIMUM
MISC.	MISCELLANEOUS
MTL.	METAL
(N)	NEW
NO.(#)	NUMBER
N.T.S.	NOT TO SCALE
O.C.	ON CENTER
OPNG.	OPENING
P/C	PRECAST CONCRETE
PCS	PERSONAL COMMUNICATION SERVICES
PLY.	PLYWOOD
PPC	POWER PROTECTION CABINET
PRC	PRIMARY RADIO CABINET
P.S.F.	POUNDS PER SQUARE FOOT
P.S.I.	POUNDS PER SQUARE INCH
P.T.	PRESSURE TREATED
PWR.	POWER (CABINET)
QTY.	QUANTITY
RAD.(R)	RADIUS
REF.	REFERENCE
REINF.	REINFORCEMENT(ING)
REQ'D/	REQUIRED
RGS.	RIGID GALVANIZED STEEL
SCH.	SCHEDULE
SHT.	SHEET
SIM.	SIMILAR
SPEC.	SPECIFICATIONS
SQ.	SQUARE
S.S.	STAINLESS STEEL
STD.	STANDARD
STL.	STEEL
STRUC.	STRUCTURAL
TEMP.	TEMPORARY
THK.	THICK(NESS)
T.N.	TOE NAIL
T.O.A.	TOP OF ANTENNA
T.O.C.	TOP OF CURB
T.O.F.	TOP OF FOUNDATION
T.O.P.	TOP OF PLATE (PARAPET)
T.O.S.	TOP OF STEEL
T.O.W.	TOP OF WALL
TYP.	TYPICAL
U.G.	UNDER GROUND
U.L.	UNDERWRITERS LABORATORY
U.N.O.	UNLESS NOTED OTHERWISE
V.I.F.	VERIFY IN FIELD
W	WIDE (WIDTH)
w/	WITH
WD.	WOOD
W.P.	WEATHERPROOF
WT.	WEIGHT
℄	CENTERLINE
PL	PLATE, PROPERTY LINE

SYMBOLS LEGEND



Issued For:
CCL06387
SANTA ROSA AVE & HWY 101 - SANTA ROSA HORN INVESTORS

4515 SANTA ROSA AVENUE
SANTA ROSA, CA 95407

PREPARED FOR

at&t

2600 Camino Ramon
San Ramon, California 94583

Vendor:

COMPLETE
Wireless Consulting, Inc.

AT&T SITE NO:	CCL06387
PROJECT NO:	162.2573
DRAWN BY:	TLS
CHECKED BY:	SV

REV	DATE	DESCRIPTION
	10/31/19	100% ZD
	09/20/19	90% ZD

Licensee:

Architect:

MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
GENERAL NOTES, ABBREVIATIONS, & LEGEND

SHEET NUMBER:
GN-1

Lease Area Descriptions

All that certain lease area being a portion of that certain parcel of land as delineated on the plat filed in Book 649 of Surveys, Page 1, Sonoma County California Records, being more particularly described as follows:

Commencing at the Northwest corner of the aforementioned parcel of land; thence along the North boundary thereof South 89°54'58" East 85.92 feet; thence leaving said North boundary South 00°05'02" West 28.60 feet to the True Point of Beginning; thence from said point of beginning South 87°15'31" East 40.00 feet; thence South 02°44'29" West 40.00 feet; thence North 87°15'31" West 40.00 feet; thence North 02°44'29" East 40.00 feet to the Point of Beginning.

Together with easements for access and utility purposes, twenty feet in width, the centerline of which is described as follows: Beginning at a point on the West boundary of the above described lease area which bears South 02°44'29" West 20.00 feet from the Northwest corner thereof; thence from said point of beginning North 76°28'19" West 87.30 feet more or less to the public right of way.

Also together with an easement for utility purposes over and across the Westerly 6.0 feet of the aforementioned parcel of land.

DATE OF SURVEY: 08-06-19

SURVEYED BY OR UNDER DIRECTION OF: KENNETH D. GEIL, RCE 14803

LOCATED IN THE COUNTY OF SONOMA, STATE OF CALIFORNIA

BEARINGS SHOWN ARE BASED UPON MONUMENTS FOUND AND RECORD INFORMATION. THIS IS NOT A BOUNDARY SURVEY.

ELEVATIONS SHOWN ON THIS PLAN ARE BASED UPON U.S.G.S. N.A.V.D. 88 DATUM. ABOVE MEAN SEA LEVEL UNLESS OTHERWISE NOTED.

N.G.V.D. 1929 CORRECTION: SUBTRACT 2.78' FROM ELEVATIONS SHOWN.

FEMA FIRM: FLOOD ZONE X PER FIRM 06097C0877E, DATED 12-02-2008.

CONTOUR INTERVAL: N.A.

ASSESSOR'S PARCEL NUMBER: 045-041-034

LANDLORD(S): SANTA ROSA HORN INVESTORS LLC
422 LARKFIELD CTR. #102
SANTA ROSA, CA 95403

Project Name: CCL06387 Santa Rosa & Hwy. 101
Project Site Location: 4515 Santa Rosa Avenue
Santa Rosa, CA 95407
Sonoma County

Date of Observation: 09-06-19

Equipment/Procedure Used to Obtain Coordinates: Trimble Pathfinder Geo XT post processed with Pathfinder Office software.

Type of Antenna Mount: Proposed Monopine

Coordinates

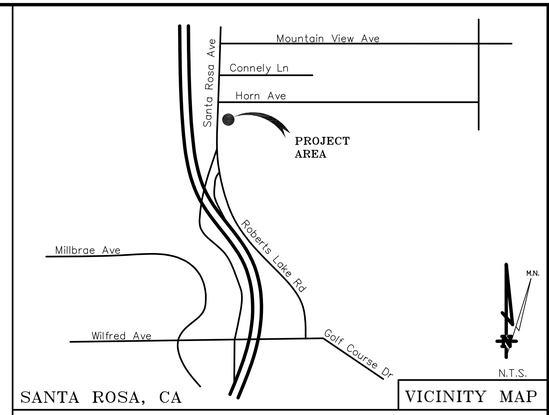
Latitude: N 38°22'18.97" (NAD83) N 38°22'19.28" (NAD27)

Longitude: W 122°42'46.36" (NAD83) W 122°42'42.41" (NAD27)

Latitude: N 38.371936° (NAD83) N 38.372022° (NAD27)

Longitude: W 122.712878° (NAD83) W 122.711781° (NAD27)

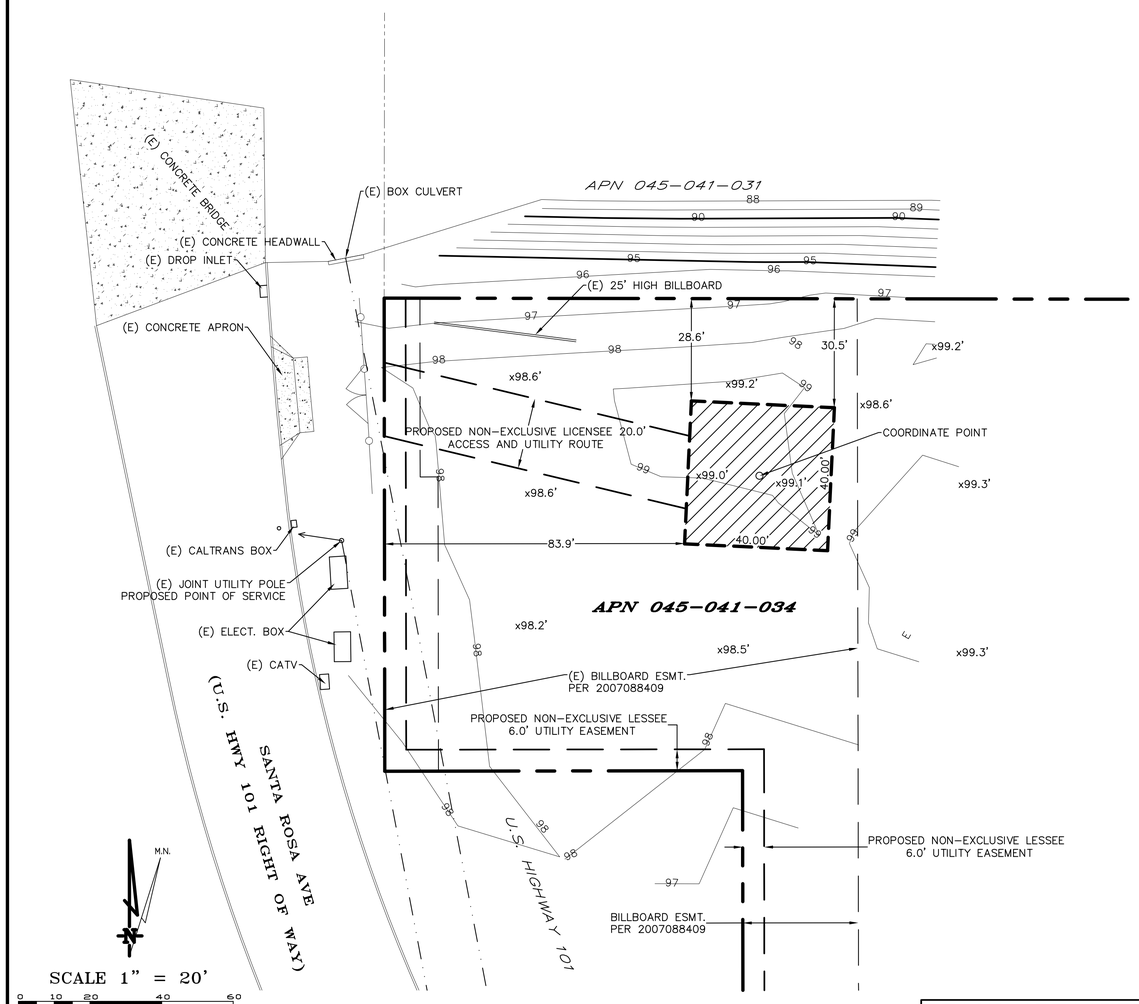
ELEVATION of Ground at Structure (NAVD88) 99.0' AMSL



SANTA ROSA, CA

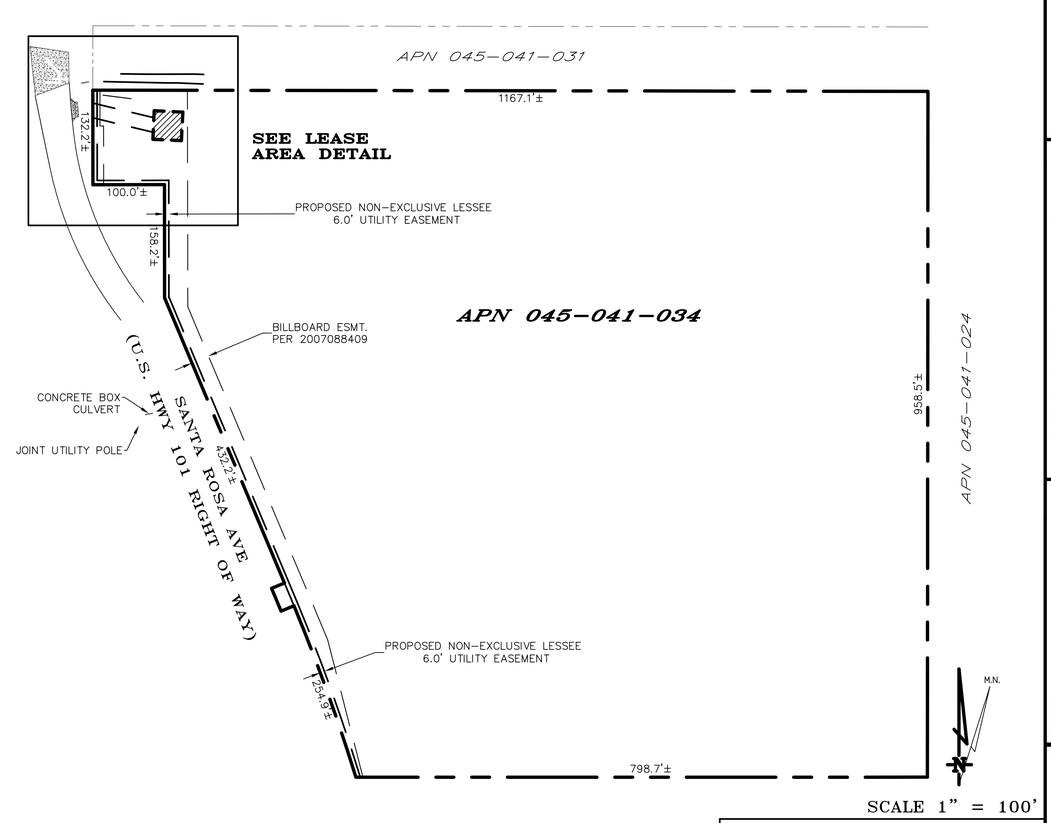
VICINITY MAP

BOUNDARY SHOWN IS BASED ON MONUMENTATION FOUND AND RECORD INFORMATION. THIS IS NOT A BOUNDARY SURVEY. THIS IS A SPECIALIZED TOPOGRAPHIC MAP WITH PROPERTY LINES AND EASEMENTS BEING A GRAPHIC DEPICTION BASED ON INFORMATION GATHERED FROM VARIOUS SOURCES OF RECORD AND AVAILABLE MONUMENTATION FOUND DURING THE FIELD SURVEY. NO EASEMENTS WERE RESEARCHED OR PLOTTED. PROPERTY LINES AND LINES OF TITLE WERE NOT INVESTIGATED NOR SURVEYED. NO PROPERTY MONUMENTS WERE SET.



SCALE 1" = 20'

LEASE AREA DETAIL



SCALE 1" = 100'

OVERALL PROJECT AREA

DEPT	APPROVED	DATE
A&C		
RE		
RF		
INT		
EE/IN		
OPS		
EE/OUT		

Surveyor
GEIL ENGINEERING
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1228 HIGH STREET
AUBURN, CALIFORNIA 95603
phone: (530) 885-0426
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at&t MOBILITY

CCL06387 Santa Rosa & Highway 101

4515 Santa Rosa Ave.
Santa Rosa, CA 95407

PLOT PLAN AND SITE TOPOGRAPHY

REVISIONS		
09-11-19	Preliminary Drawing	dg

Sheet

C-1

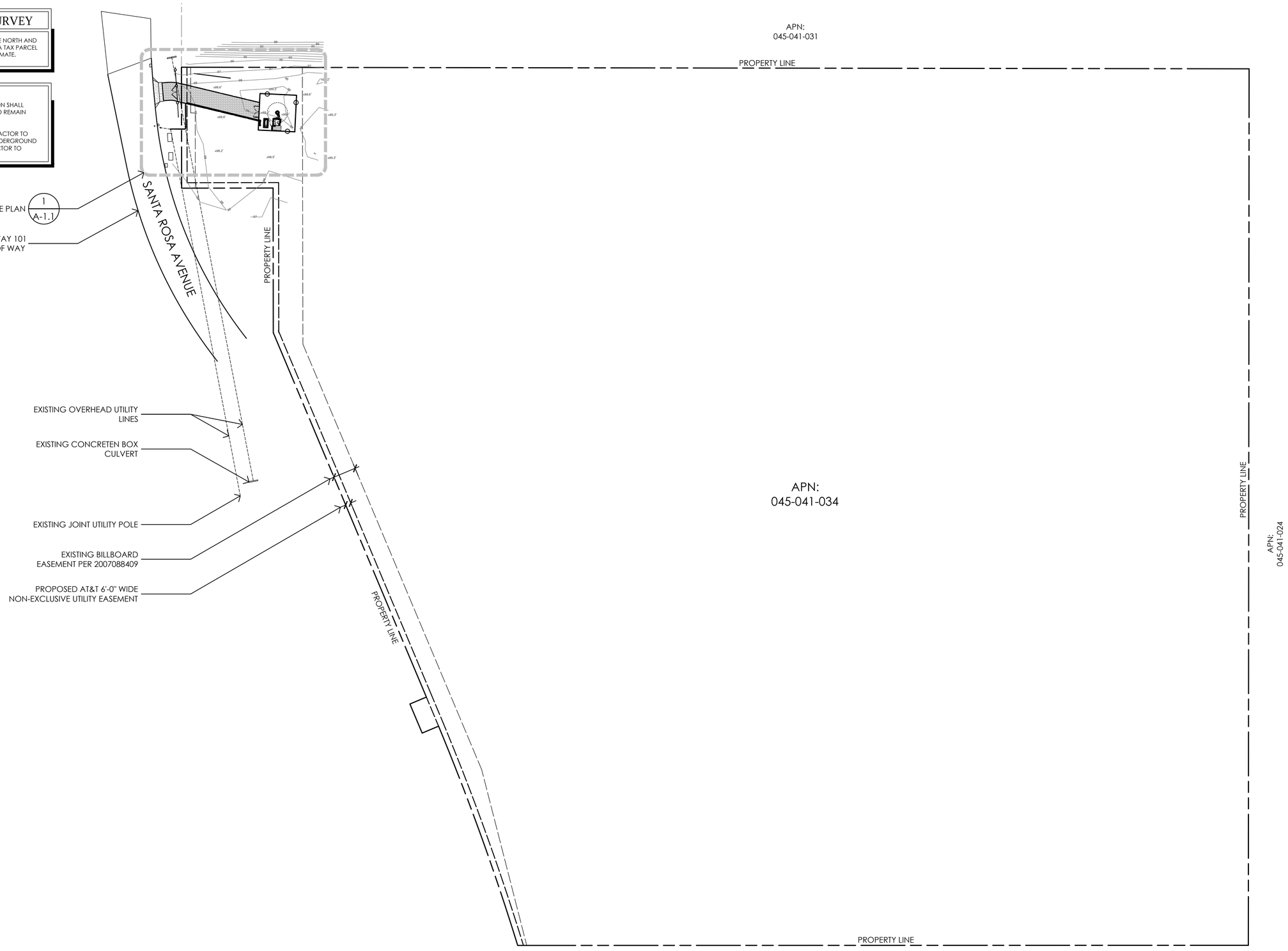
THIS IS NOT A SITE SURVEY

ALL PROPERTY BOUNDARIES, ORIENTATION OF TRUE NORTH AND STREET HALF-WIDTHS HAVE BEEN OBTAINED FROM A TAX PARCEL MAP AND EXISTING DRAWINGS AND ARE APPROXIMATE.

NOTES:

1. NO GRADING OR PERMANENT CONSTRUCTION SHALL OCCUR WITHIN DRIP LINES OF TREES THAT ARE TO REMAIN WITHOUT ARBORIST APPROVAL.

2. PRIOR TO CONSTRUCTION, GENERAL CONTRACTOR TO CONTACT DIGALERT TO MARK OUT EXISTING UNDERGROUND UTILITIES. IN THE EVENT OF CONFLICTS, CONTRACTOR TO CONTACT PDC.



PLAN NORTH
NORTH

0' 10' 50' 100'
1" = 50.0'

1 OVERALL SITE PLAN
1"=50'

Issued For:
CCL06387
SANTA ROSA AVE & HWY 101 - SANTA ROSA HORN INVESTORS

4515 SANTA ROSA AVENUE
SANTA ROSA, CA 95407

PREPARED FOR

at&t

2600 Camino Ramon
San Ramon, California 94583

Vendor:

COMPLETE
Wireless Consulting, Inc.

AT&T SITE NO:	CCL06387
PROJECT NO:	162.2573
DRAWN BY:	TLS
CHECKED BY:	SV

REV	DATE	DESCRIPTION
	10/31/19	100% ZD
	09/20/19	90% ZD

Licensee:

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

Architect:

MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
OVERALL SITE PLAN

SHEET NUMBER:
A-1

EXISTING CONCRETE HEADWALL & BOX CULVERT

EXISTING METAL DRAINAGE GRATE

PROPOSED AT&T 20'-0" WIDE ALL-WEATHER GRAVEL DRIVEWAY

EXISTING CONCRETE DRIVEWAY APPROACH, PROPOSED AT&T SITE ACCESS

EXISTING BILLBOARD

PROPERTY LINE

SANTA ROSA AVENUE

EXISTING CHAIN LINK GATE W/ BARBED WIRE, PROPOSED AT&T SITE ACCESS GATE

PROPOSED AT&T KNOX BOX

EXISTING FENCE

EXISTING CALTRANS GROUND VAULT

EXISTING UTILITY POLE GUY WIRE

EXISTING JOINT UTILITY POLE, PROPOSED AT&T POWER & TELCO P.O.F.

EXISTING ELECTRICAL GROUND VAULT

EXISTING OVERHEAD UTILITY LINES (TYP.)

EXISTING CONCRETE CURB W/ GUTTER

EXISTING ELECTRICAL GROUND VAULT

EXISTING CATV GROUND VAULT

PROPOSED AT&T 20'-0" WIDE NON-EXCLUSIVE ACCESS & UTILITY EASEMENT

PROPOSED AT&T UNDERGROUND POWER & TELCO (±130'-0")

PROPOSED AT&T 6'-0" WIDE NON-EXCLUSIVE UTILITY EASEMENT

EQUIPMENT AREA PLAN 1 / A-2

PROPERTY LINE

83'-11"

36'-3"

28'-7"

30'-6"

EXISTING BILLBOARD EASEMENT PER 2007088409

NOTES:

1. NO GRADING OR PERMANENT CONSTRUCTION SHALL OCCUR WITHIN DRIP LINES OF TREES THAT ARE TO REMAIN WITHOUT ARBORIST APPROVAL.

2. PRIOR TO CONSTRUCTION, GENERAL CONTRACTOR TO CONTACT DIGALERT TO MARK OUT EXISTING UNDERGROUND UTILITIES. IN THE EVENT OF CONFLICTS, CONTRACTOR TO CONTACT PDC.

PLAN NORTH

NORTH

0' 2' 10' 20'

1/8" = 1'-0"

1 ENLARGED SITE PLAN

1/8" = 1'-0"

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Architect:

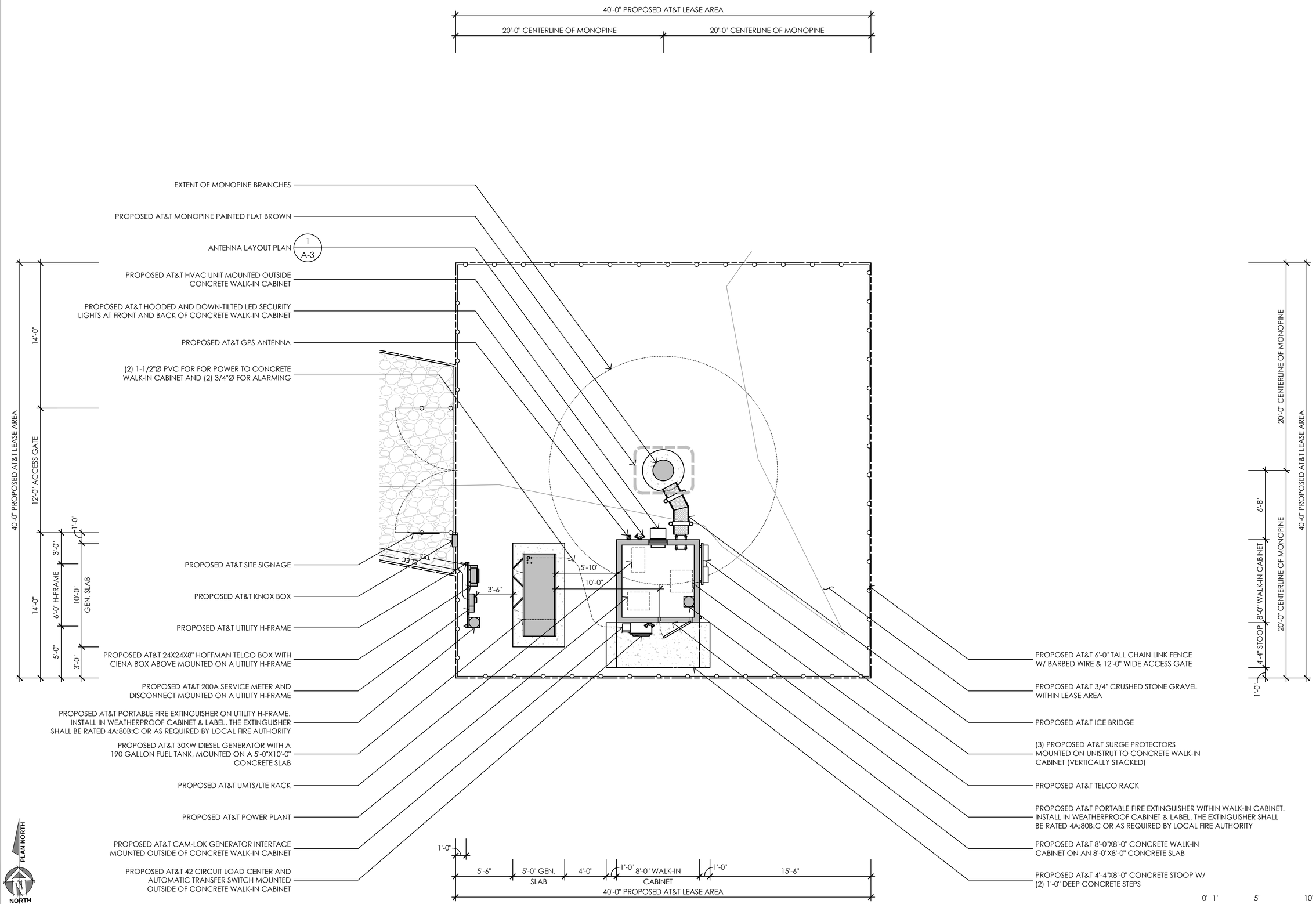
MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:

ENLARGED SITE PLAN

SHEET NUMBER:

A-1.1



1 EQUIPMENT AREA PLAN
1/4" = 1'-0"

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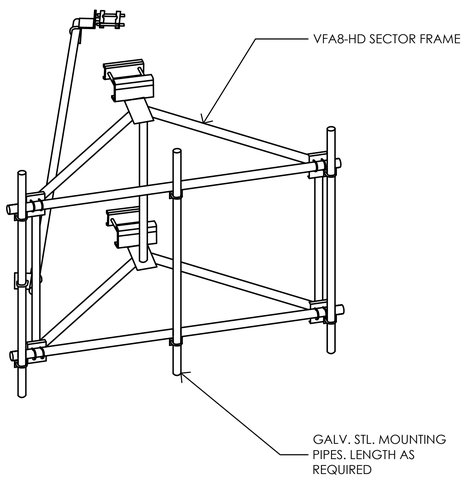
Sacramento, California 95815

SHEET TITLE:
EQUIPMENT AREA PLAN

SHEET NUMBER:
A-2



6 SITEPRO SECTOR FRAME VFA8-HD
NO SCALE

RF DATA SHEET v1.00.0 DATED 06/10/2019 NOTE: ANTENNA POSITIONS ARE LEFT TO RIGHT FROM FRONT OF ANTENNA EQUIPMENT IS PRELIMINARY AND SUBJECT TO CHANGE.

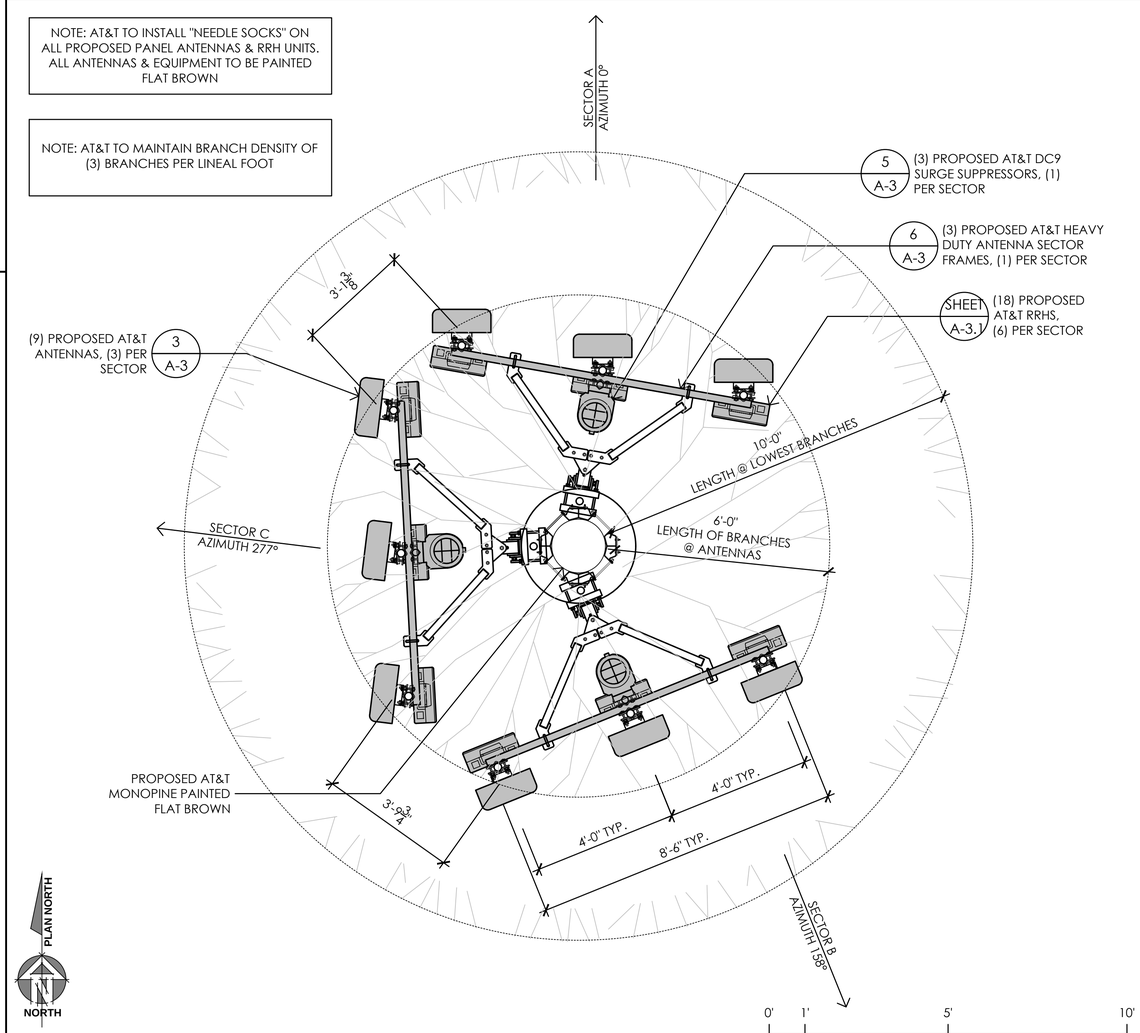
RF SCHEDULE

SECTOR		ANTENNA MODEL NO.	AZIMUTH	CENTERLINE	RRH	TMA	FIBER LENGTH	COAX LENGTH	JUMPER TYPE	RRU NO.	DC FEEDS
ALPHA	A1	NNH4-65B-R6	0°	± 82'-0"	(1) 4449 B5/B12 / (1) 8843 B2/B66A	-	± 100'-0"	-	LDF4	(2)	(4)
	A2	NNH4-65B-R6	0°	± 82'-0"	(1) 4478 B14 / (1) 4415 B25	-	± 100'-0"	-	LDF4	(2)	(2)
	A3	NNH4-65B-R6	0°	± 82'-0"	(1) RRUS-E2 B29 / (1) 4415 B30	-	± 100'-0"	-	LDF4	(2)	(2)
	A4	-	-	-	-	-	-	-	-	-	-
BETA	B1	NNH4-65B-R6	158°	± 82'-0"	(1) 4449 B5/B12 / (1) 8843 B2/B66A	-	± 100'-0"	-	LDF4	(2)	(4)
	B2	NNH4-65B-R6	158°	± 82'-0"	(1) 4478 B14 / (1) 4415 B25	-	± 100'-0"	-	LDF4	(2)	(2)
	B3	NNH4-65B-R6	158°	± 82'-0"	(1) RRUS-E2 B29 / (1) 4415 B30	-	± 100'-0"	-	LDF4	(2)	(2)
	B4	-	-	-	-	-	-	-	-	-	-
GAMMA	C1	NNH4-65B-R6	277°	± 82'-0"	(1) 4449 B5/B12 / (1) 8843 B2/B66A	-	± 100'-0"	-	LDF4	(2)	(4)
	C2	NNH4-65B-R6	277°	± 82'-0"	(1) 4478 B14 / (1) 4415 B25	-	± 100'-0"	-	LDF4	(2)	(2)
	C3	NNH4-65B-R6	277°	± 82'-0"	(1) RRUS-E2 B29 / (1) 4415 B30	-	± 100'-0"	-	LDF4	(2)	(2)
	C4	-	-	-	-	-	-	-	-	-	-
										TOTAL	(24)

2 RF SCHEDULE
NO SCALE

NOTE: AT&T TO INSTALL "NEEDLE SOCKS" ON ALL PROPOSED PANEL ANTENNAS & RRH UNITS. ALL ANTENNAS & EQUIPMENT TO BE PAINTED FLAT BROWN

NOTE: AT&T TO MAINTAIN BRANCH DENSITY OF (3) BRANCHES PER LINEAL FOOT



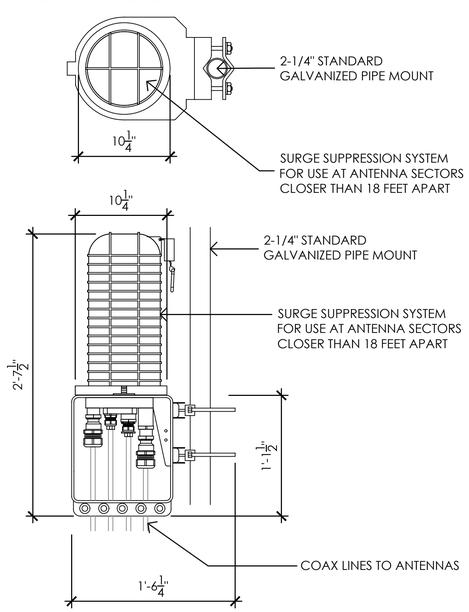
1 ANTENNA LAYOUT PLAN
1/2" = 1'-0"

RAYCAP DC9-48-60-24-8C-EV SURGE SUPPRESSION SOLUTION

COLOR: BLACK/SILVER

DIMENSIONS: 10.25" DIA X 2'-7.5" TALL W/ 1'-1.5' BASE

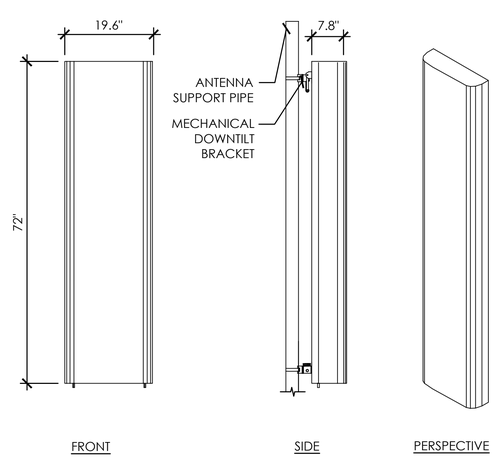
WEIGHT: 26.2 LBS.±



5 DC SURGE SUPPRESSION (SQUID)
1-1/2" = 1'-0"

4 NOT USED
NO SCALE

EQUIPMENT SUBJECT TO CHANGE



ANTENNA = COMMSCOPE (NNH4-65B-R6)
WEIGHT = 89.7 LBS
DIMENSIONS = 72.0" (H) x 19.6" (W) x 7.8" (D)

3 PROPOSED ANTENNA SPEC
3/4" = 1'-0"

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SANTA ROSA, CA 95407

PREPARED FOR
at&t
2600 Camino Ramon
San Ramon, California 94583

Vendor:
COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL06387
PROJECT NO:	162.2573
DRAWN BY:	TLS
CHECKED BY:	SV

REV	DATE	DESCRIPTION
	10/31/19	100% ZD
	09/20/19	90% ZD

Licensee:

Architect:
MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
ANTENNA PLAN, SCHEDULE, & DETAILS

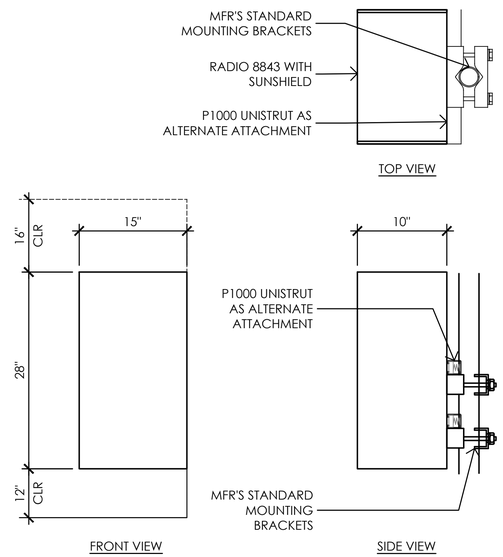
SHEET NUMBER:
A-3

ERICSSON RADIO 8843 REMOTE RADIO UNIT

COLOR: WHITE

DIMENSIONS: 28" TALL X 15" WIDE X 10" DEEP (INCLUDING SUNSHIELD)

WEIGHT: 85 LBS.± (INCLUDING MOUNTING HARDWARE)



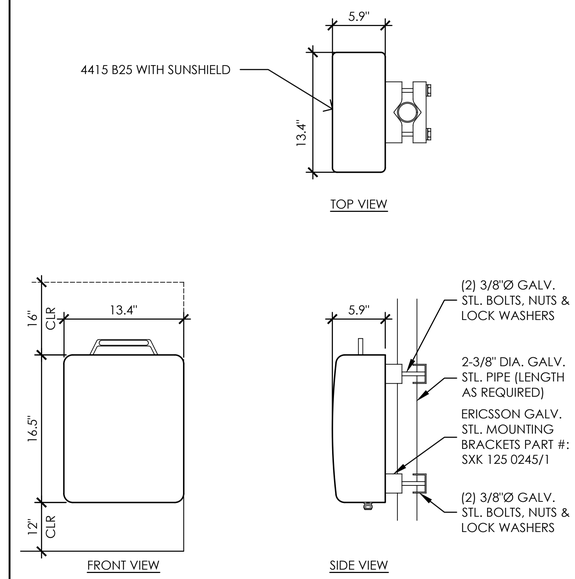
4 ERICSSON RADIO 8843 REMOTE RADIO UNIT
1-1/2"= 1'-0"

ERICSSON RADIO 4415 B25 REMOTE RADIO UNIT

COLOR: WHITE

DIMENSIONS: 16.5" TALL X 13.4" WIDE X 5.9" DEEP (INCLUDING SUNSHIELD)

WEIGHT: +/- 50 LBS. (INCLUDING MOUNTING HARDWARE)



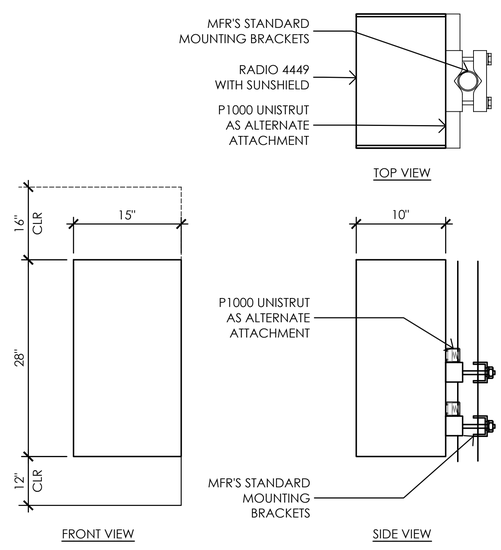
2 ERICSSON RADIO 4415 B25/B30 REMOTE RADIO UNIT
1-1/2"= 1'-0"

ERICSSON RADIO 4449 REMOTE RADIO UNIT

COLOR: WHITE

DIMENSIONS: 28" TALL X 15" WIDE X 10" DEEP (INCLUDING SUNSHIELD)

WEIGHT: 85 LBS± (INCLUDING MOUNTING HARDWARE)



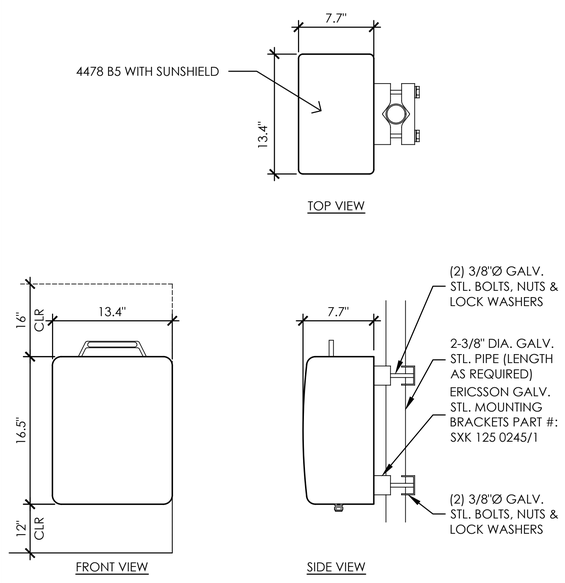
5 ERICSSON RADIO 4449 REMOTE RADIO UNIT
1-1/2"= 1'-0"

ERICSSON RADIO 4478 B5 REMOTE RADIO UNIT

COLOR: WHITE

DIMENSIONS: 16.5" TALL X 17" WIDE X 7.7" DEEP (INCLUDING SUNSHIELD)

WEIGHT: +/- 59.9 LBS. (INCLUDING MOUNTING HARDWARE)



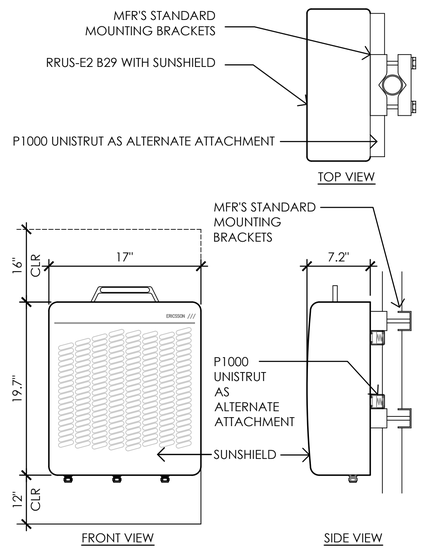
3 ERICSSON RADIO 4478 B5 REMOTE RADIO UNIT
1-1/2"= 1'-0"

ERICSSON RRUS-E2 B29 REMOTE RADIO UNIT

COLOR: WHITE

DIMENSIONS: 19.7" TALL X 17" WIDE X 7.2" DEEP (INCLUDING SUNSHIELD)

WEIGHT: +/- 50 LBS. (INCLUDING MOUNTING HARDWARE)



1 ERICSSON RRUS-E2 B29 REMOTE RADIO UNIT
1-1/2"= 1'-0"

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SANTA ROSA AVE & HWY 101 - SANTA ROSA HORN INVESTORS

4515 SANTA ROSA AVENUE
SANTA ROSA, CA 95407

PREPARED FOR
at&t
2600 Camino Ramon
San Ramon, California 94583

Vendor:
COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CCL06387
PROJECT NO:	162.2573
DRAWN BY:	TLS
CHECKED BY:	SV

REV	DATE	DESCRIPTION
	10/31/19	100% ZD
	09/20/19	90% ZD

Licensee:

Architect:
MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
RRH DETAILS

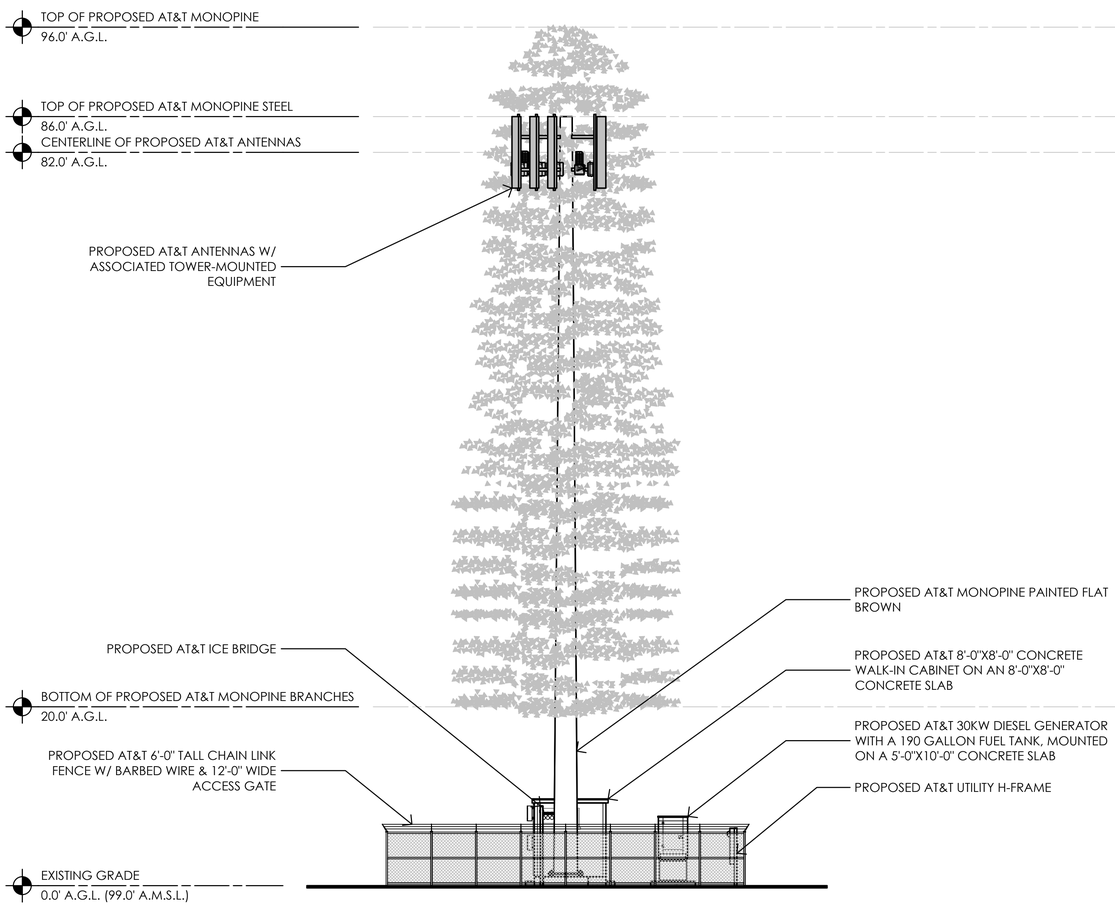
SHEET NUMBER:
A-3.1

NOTE: AT&T TO INSTALL "NEEDLE SOCKS" ON ALL PROPOSED PANEL ANTENNAS & RRH UNITS. ALL ANTENNAS & EQUIPMENT TO BE PAINTED FLAT BROWN

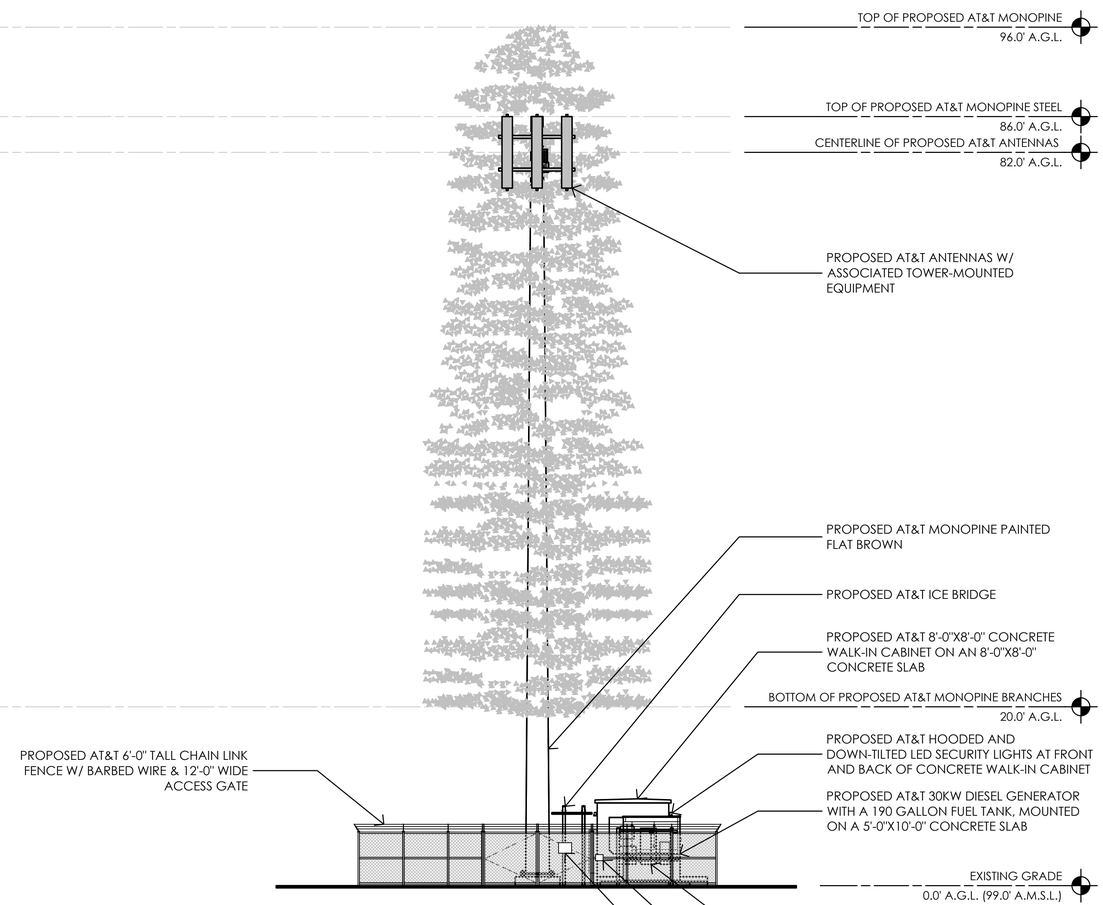
NOTE: BRANCHES SHOWN ARE FOR ILLUSTRATIVE PURPOSES ONLY. NOT TO SCALE

MONOPINE TO BE STRUCTURALLY ENGINEERED FOR A TOTAL OF (3) WIRELESS CARRIERS

NOTE: AT&T TO MAINTAIN BRANCH DENSITY OF (3) BRANCHES PER LINEAL FOOT



2 NORTH ELEVATION
1/8" = 1'-0"



1 WEST ELEVATION
1/8" = 1'-0"

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REV	DATE	DESCRIPTION
	10/31/19	100% ZD
	09/20/19	90% ZD

Licensee:

Architect:
MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
PROPOSED ELEVATIONS

SHEET NUMBER:
A-4.1

NOTE: AT&T TO INSTALL "NEEDLE SOCKS" ON ALL PROPOSED PANEL ANTENNAS & RRH UNITS. ALL ANTENNAS & EQUIPMENT TO BE PAINTED FLAT BROWN

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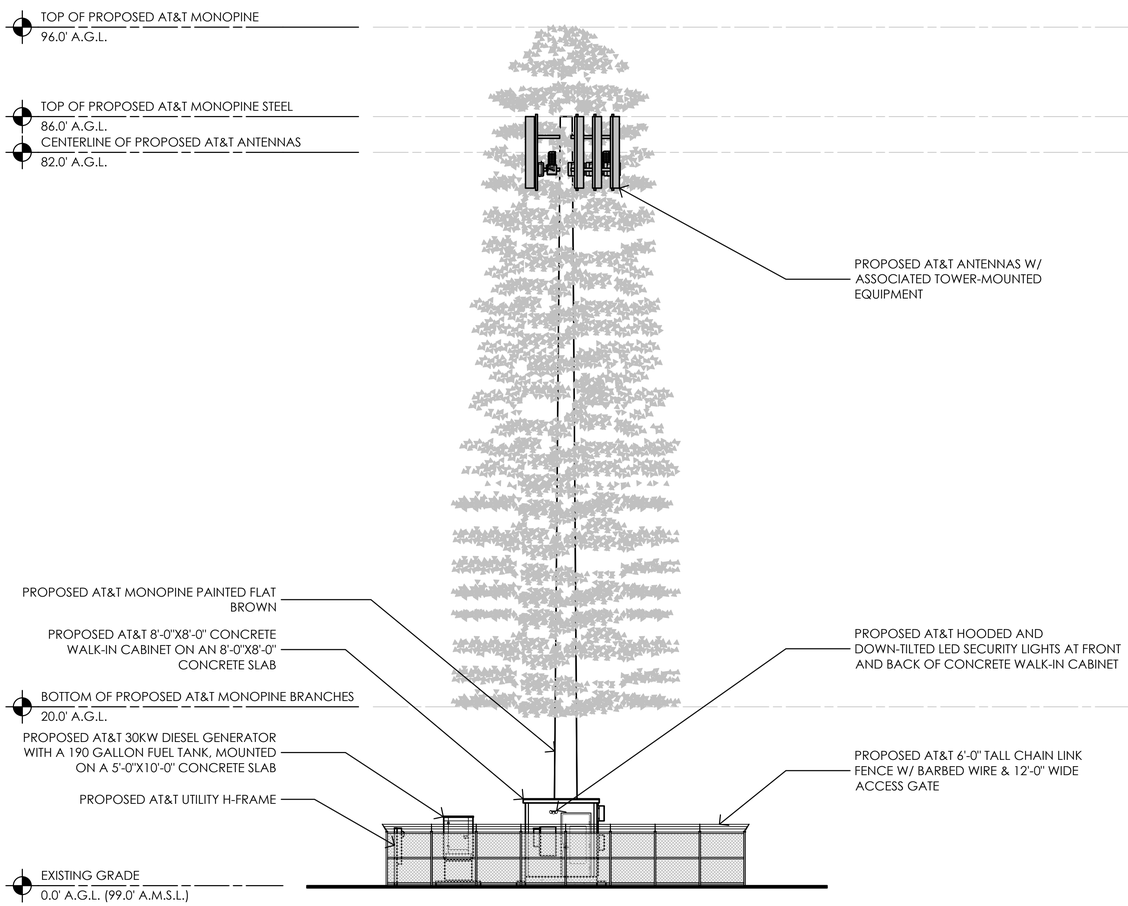
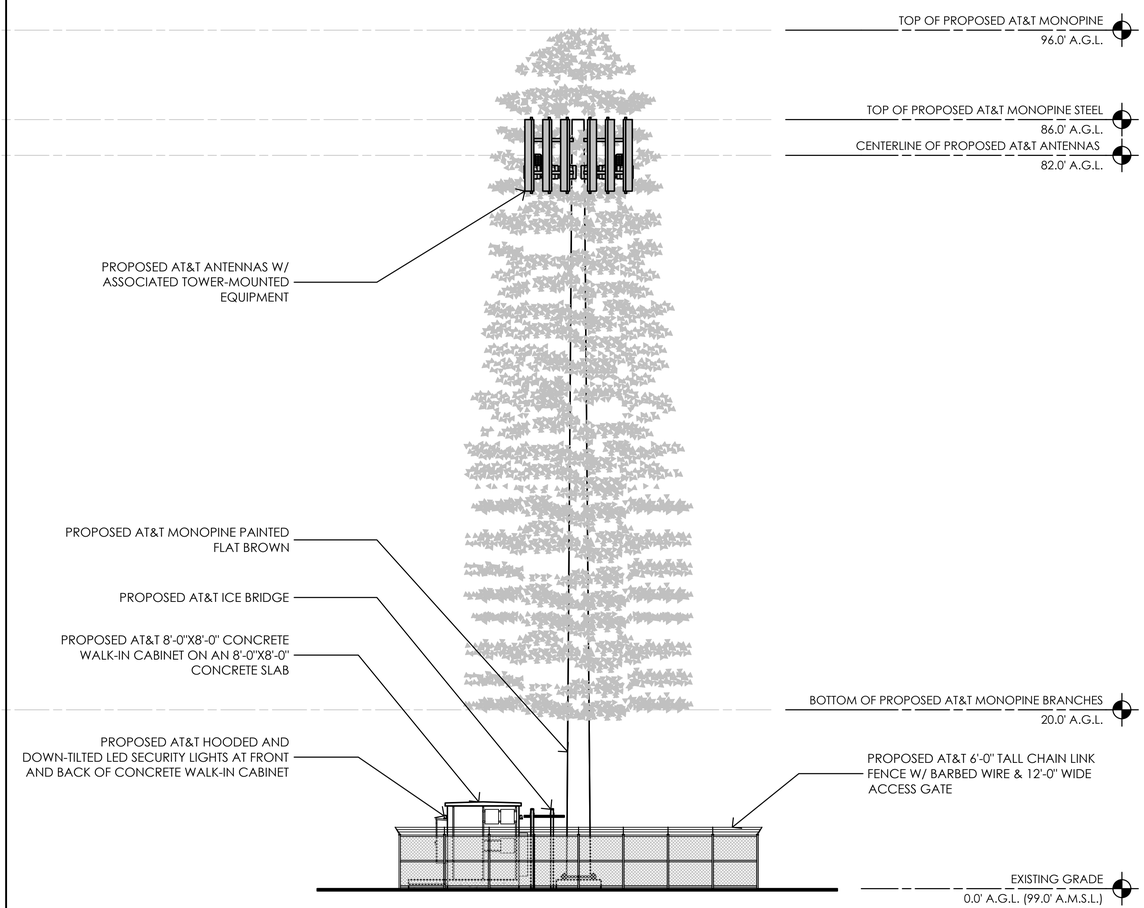
MONOPINE TO BE STRUCTURALLY ENGINEERED FOR A TOTAL OF (3) WIRELESS CARRIERS

NOTE: AT&T TO MAINTAIN BRANCH DENSITY OF (3) BRANCHES PER LINEAL FOOT



2 SOUTH ELEVATION
1/8" = 1'-0"



1 EAST ELEVATION
1/8" = 1'-0"

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Architect:
MST ARCHITECTS
1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:
PROPOSED ELEVATIONS

SHEET NUMBER:
A-4.2

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4514 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 10-11-2019

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

Shot Point Map

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

view from Roberts Lake Road looking north at site

AT&T Wireless

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4514 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

view from Santa Rosa Avenue looking southeast at site

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4514 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

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view from Horn Avenue looking southwest at site

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4514 Santa Rosa Avenue, Santa Rosa, CA
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view from Milbrae Avenue looking northeast at site

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4514 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

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AT&T Wireless

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4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 6-7-2021

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Shot Point Map

Existing

Proposed

view from Roberts Lake Road looking northeast at site perspective matching SBA view 1

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4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

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view from Roberts Lake Road looking north at site perspective matching SBA view 2

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

view from Roberts Lake Road looking northwest at site perspective matching SBA view 3

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Photo Simulation Solutions
Contact (925) 202-8507

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

Existing

Proposed

view from Roberts Lake Road looking northeast at site perspective matching SBA view 4

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Photo Simulation Solutions
Contact (925) 202-8507

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

view from N. Rohnert Park Trail looking southwest at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

view from N. Rohnert Park Trail looking southwest at site

AT&T Wireless

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4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

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Contact (925) 202-8507

view from N. Rohnert Park Trail looking southwest at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

Existing

Proposed

view from Fescue Way looking northwest at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

Existing

Proposed

view from Firethorn Drive looking northwest at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

view from Roberts Lake Park northwest at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

Existing

Proposed

view from Roberts Lake Park northwest at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

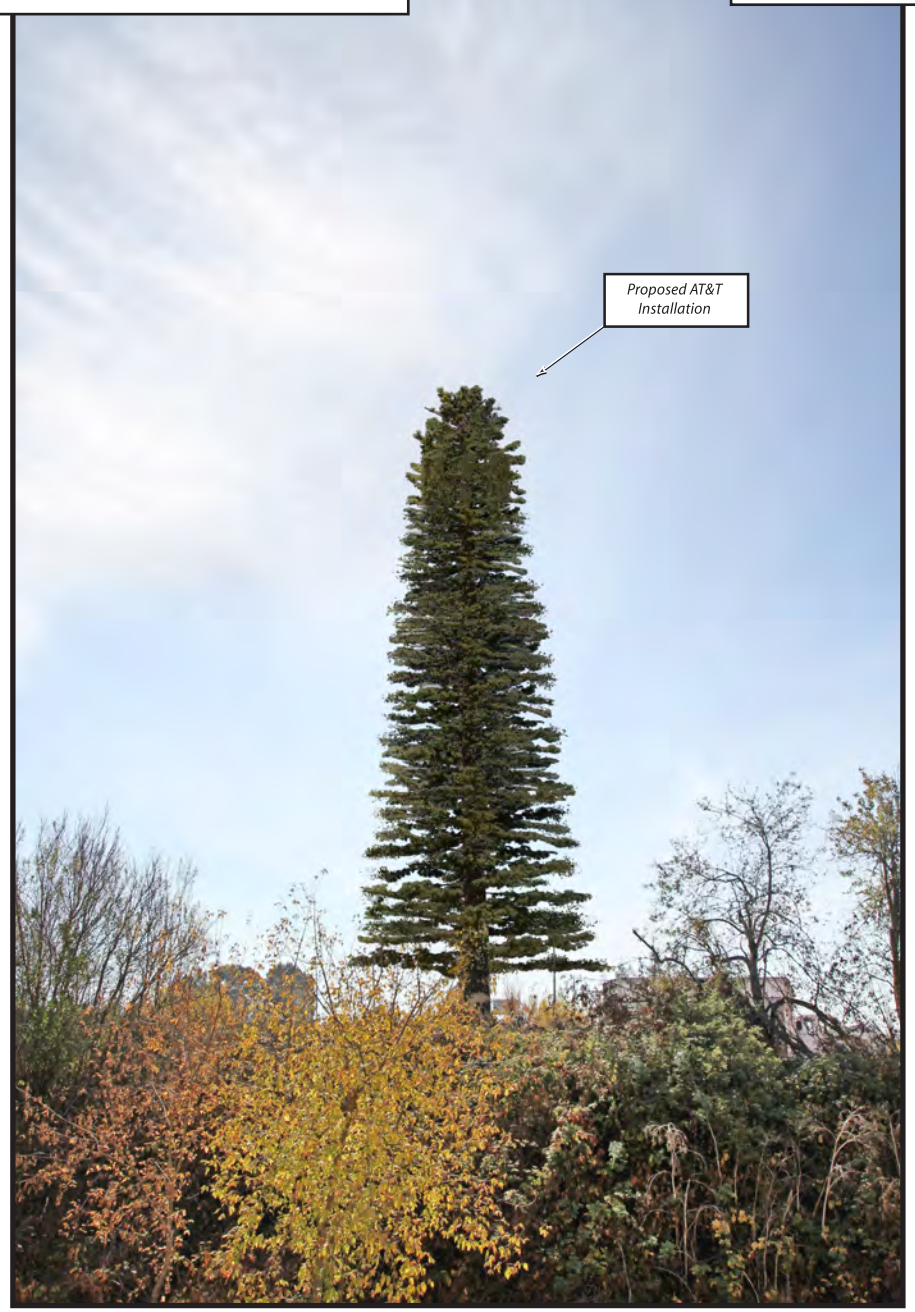
view from N. Rohnert Park Trail looking south at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

Existing

Proposed



AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

view from Roberts Lake Road looking north at site

AT&T Wireless

CCL06387 Santa Rosa Ave & Hwy 101
4515 Santa Rosa Avenue, Santa Rosa, CA
Photosims Produced on 4-30-2021

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

ALTERNATIVE SITES ANALYSIS
AT&T MOBILITY

Site Name: CCL06387 Santa Rosa Ave & Hwy 101
Location: 4515 Santa Rosa Avenue, Santa Rosa, CA 95407
APN: 045-041-034

Introduction

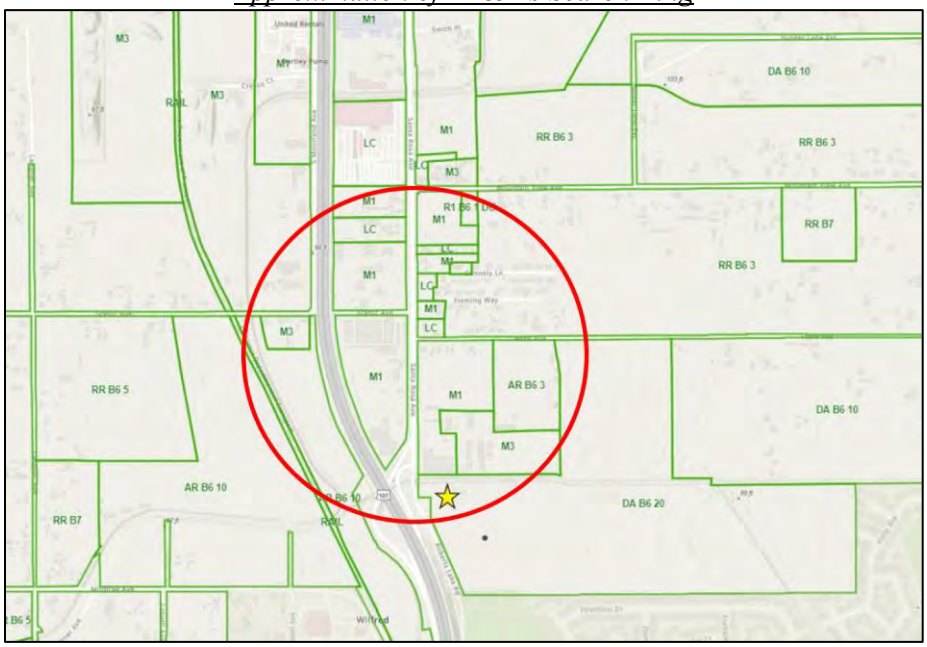
AT&T Wireless strives to minimize visual and noise impacts for each facility and seeks to incorporate ways to preserve the local community character to the greatest extent feasible at all stages of site selection and design process. Part of this involves seeking properties in areas with substandard wireless coverage that provide the ability to meet community needs, zoning standards, and engineering requirements. In identifying the location of a new wireless telecommunication facility to fulfill the above referenced service objectives a variety of factors are evaluated. These factors include:

- A willing landlord,
- Compliance with local zoning requirements,
- Satisfaction of the radiofrequency coverage need, and
- Constructability, including available utilities and road access.

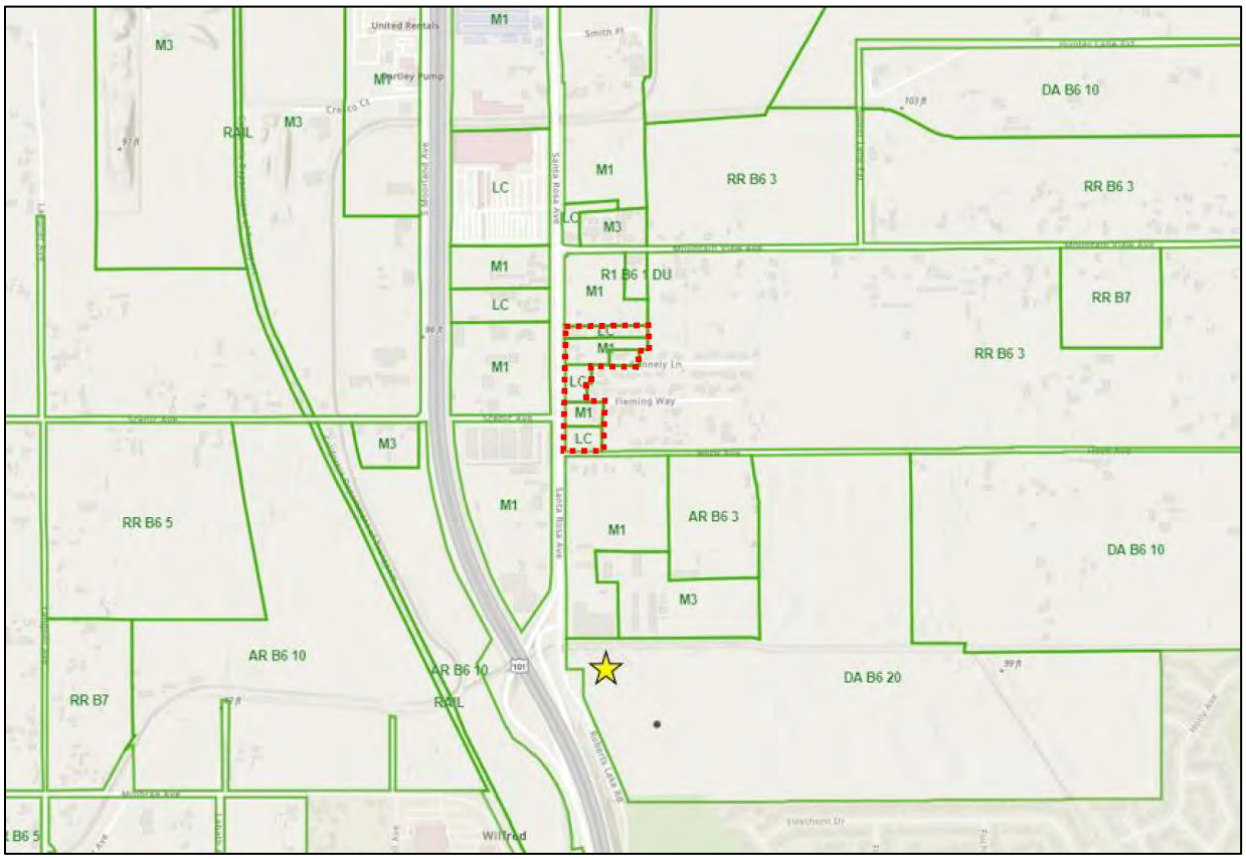
Additionally, the first step is always to seek existing structures that would allow for colocation instead of needing to construct a brand-new facility. AT&T Wireless conducted an exhaustive search for alternative sites, after which it determined that the proposed site at 4515 Santa Rosa Ave. is the best available location for a wireless telecommunications facility to meet the desired coverage objective.

The proposed location best serves the interest of Sonoma County and the local community because it is the least intrusive means available to improve service to the area. As part of the search for alternative candidates, existing structures and towers that could host the facility were sought but no viable candidates were found. Please see the coverage maps included with this application for more information.

Approximation of AT&T's Search Ring



ELIMINATED DUE TO SMALL PARCEL SIZE



Note: Project Location noted by yellow star, considered parcels in dotted red.

Name: Bob's RV & Trailer Storage
Site Address: 4156 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-003
Zone: M1, RR B6 3, VOH
Elevation: 101'
Parcel Size: 1.12 acres

The parcel is very small and currently houses RV's and trailers throughout. There is no space to allow for a freestanding facility, maintain the traffic flow on the parcel, and maintain wireless setbacks from the residences on Connely Lane.

Name: Bob's RV & Trailer Storage
Site Address: 4156 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-050
Zone: M1, VOH
Elevation: 101'
Parcel Size: 0.57 acres

The parcel is partially utilized by the above business. There is also a residence on the parcel. There is no space to allow for a freestanding facility, maintain the traffic flow on the parcel, and maintain wireless setbacks from the residences on Connely Lane.

Name: Private Home
Site Address: 111 Connely Ln, Santa Rosa, CA 95407
APN: 045-290-066
Zone: M3, VOH
Elevation: 106'
Parcel Size: 0.18 acres

Regardless of the zone, there is a residence on this parcel. There is no space to allow for a freestanding facility, maintain the traffic flow on the parcel, and maintain wireless setbacks from the other residences on Connely Lane.

Name: Tana Movers & Storage
Site Address: 4166 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-049
Zone: LC, VOH
Elevation: 100'
Parcel Size: 0.50 acres

This business operates on 3 small parcels without any space to allow for a freestanding facility. In addition, a new tower will be unable to meet the wireless setback requirements from residences on Fleming Way.

Name: Tana Movers & Storage
Site Address: 4166 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-025
Zone: LC, VOH
Elevation: 100'
Parcel Size: 0.20 acres

This business operates on 3 small parcels without any space to allow for a freestanding facility. In addition, a new tower will be unable to meet the wireless setback requirements from residences on Fleming Way.

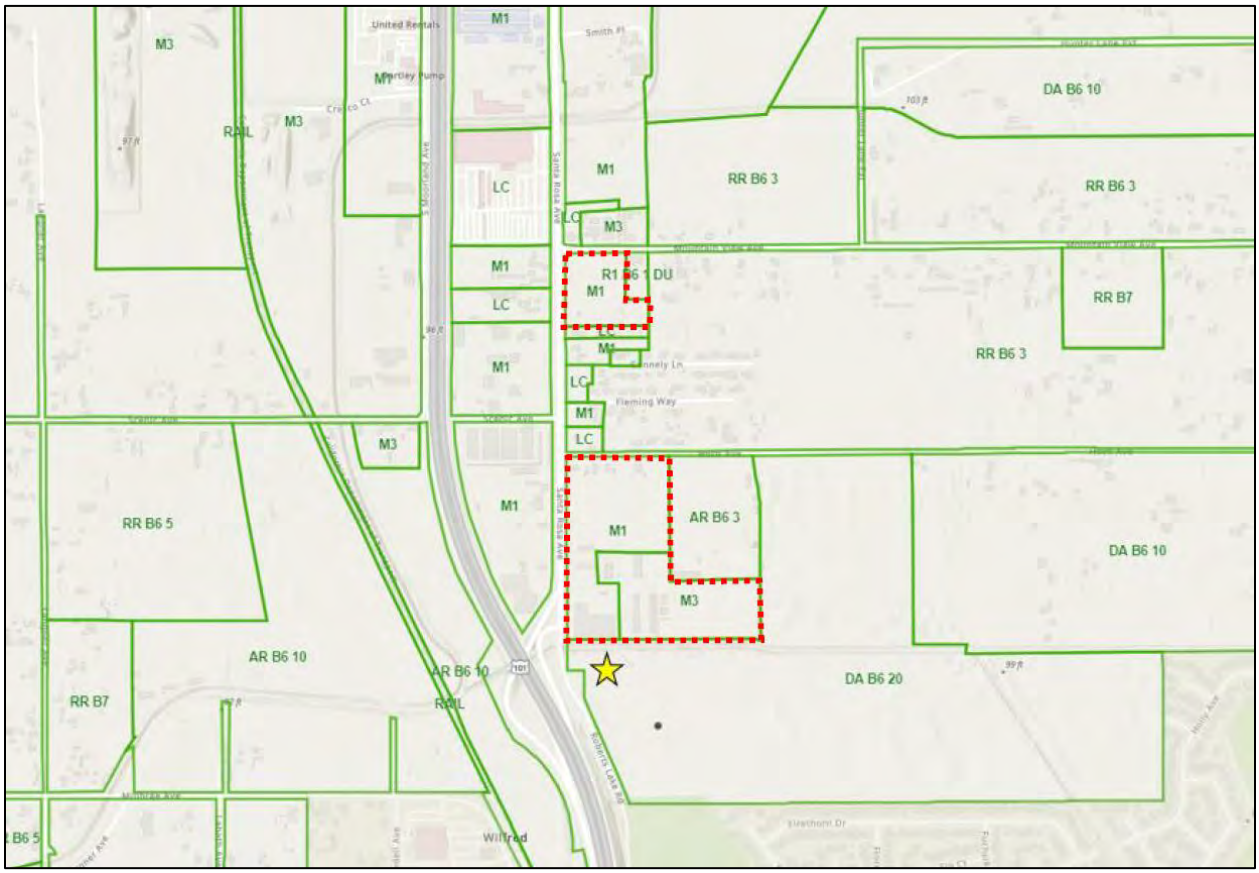
Name: Tana Movers & Storage
Site Address: 4166 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-026
Zone: LC, VOH
Elevation: 100'
Parcel Size: 0.18 acres

This business operates on 3 small parcels without any space to allow for a freestanding facility. In addition, a new tower will be unable to meet the wireless setback requirements from residences on Fleming Way.

Name: Redwood Residential Fence Co.
Site Address: 4170 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-097
Zone: LC, M1, RR B6 3, VOH
Elevation: 98'
Parcel Size: 2.05 acres

This parcel is split-zoned between M1 and LC. There is no space to allow for a freestanding facility, maintain the traffic flow on the parcel, or construct the facility with major disturbance to the existing business operations.

ELIMINATED DUE TO LACK OF DEVELOPABLE SPACE



Note: Project Location noted by yellow star, considered parcels in dotted red.

Name: PG&E
Site Address: Southeast intersection of Mountain View Ave. and Santa Rosa Ave.
APN: 045-022-032
Zone: M1, VOH
Elevation: 102'
Parcel Size: 2.78 acres

PG&E will not allow AT&T to place any equipment within its substation. The laydown yard adjacent to the substation does not have enough space and it used for equipment storage. Lastly, PG&E has also notified Complete Wireless that the location is used for emergency stating in the Santa Rosa area.

Email Rejection from PG&E

Rocky Cordova

From: Tillisch, Jim [redacted]
Sent: Friday, February 8, 2019 11:22 AM
To: Rocky Cordova
Subject: RE: PG&E proposed site - Sonoma - CVL06387

Morning Rocky,

Unfortunately this substation property will not works for us. The laydown yard adjacent to the sub has limited space and is used for equipment storage and is also a location that is used for emergency staging in the Santa Rosa area.

We don't have any transmission towers remotely close in this vicinity.

Jim Tillisch
Pacific Gas & Electric
Property Specialist
5555 Florin Perkins Road. #109H
Sacramento, CA 95826
[redacted]

Name: W&W Family LLC (W Johnson Ornamental Stone)
Site Address: 4132 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-001
Zone: M1, VOH
Elevation: 101'
Parcel Size: 2.11 acres

The business operates on 2 parcels, which are zoned differently. There is no space to allow for a freestanding facility, maintain the traffic flow on the parcel, or construct the facility with major disturbance to the existing business operations.

Name: W&W Family LLC (W Johnson Ornamental Stone)
Site Address: 4132 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-290-002
Zone: LC, VOH
Elevation: 101'
Parcel Size: 1.02 acres

The business operates on 2 parcels, which are zoned differently. There is no space to allow for a freestanding facility, maintain the traffic flow on the parcel, or construct the facility with major disturbance to the existing business operations.

Name: Private Homes
Site Address: 112 Horn Ave., Santa Rosa, CA 95407
APN: 045-041-001
Zone: AR B6 3, M1, VOH
Elevation: 95'
Parcel Size: 9.34 acres

This parcel is split-zoned between M1 and AR. Upon the initial site visit to the area, the parcel, though partially zoned M1, has residences on the property. Due to the height of the requested tower, any small parcels with a residential use were eliminated from further consideration.

Name: T J RV & Boat Storage
Site Address: 4266 Santa Rosa Ave, Santa Rosa, CA 95407
APN: 045-041-002
Zone: AR B6 3, M1, VOH
Elevation: 98'
Parcel Size: 9.37 acres

This parcel is too small to accommodate a freestanding facility and there are no tall buildings on which to collocate.

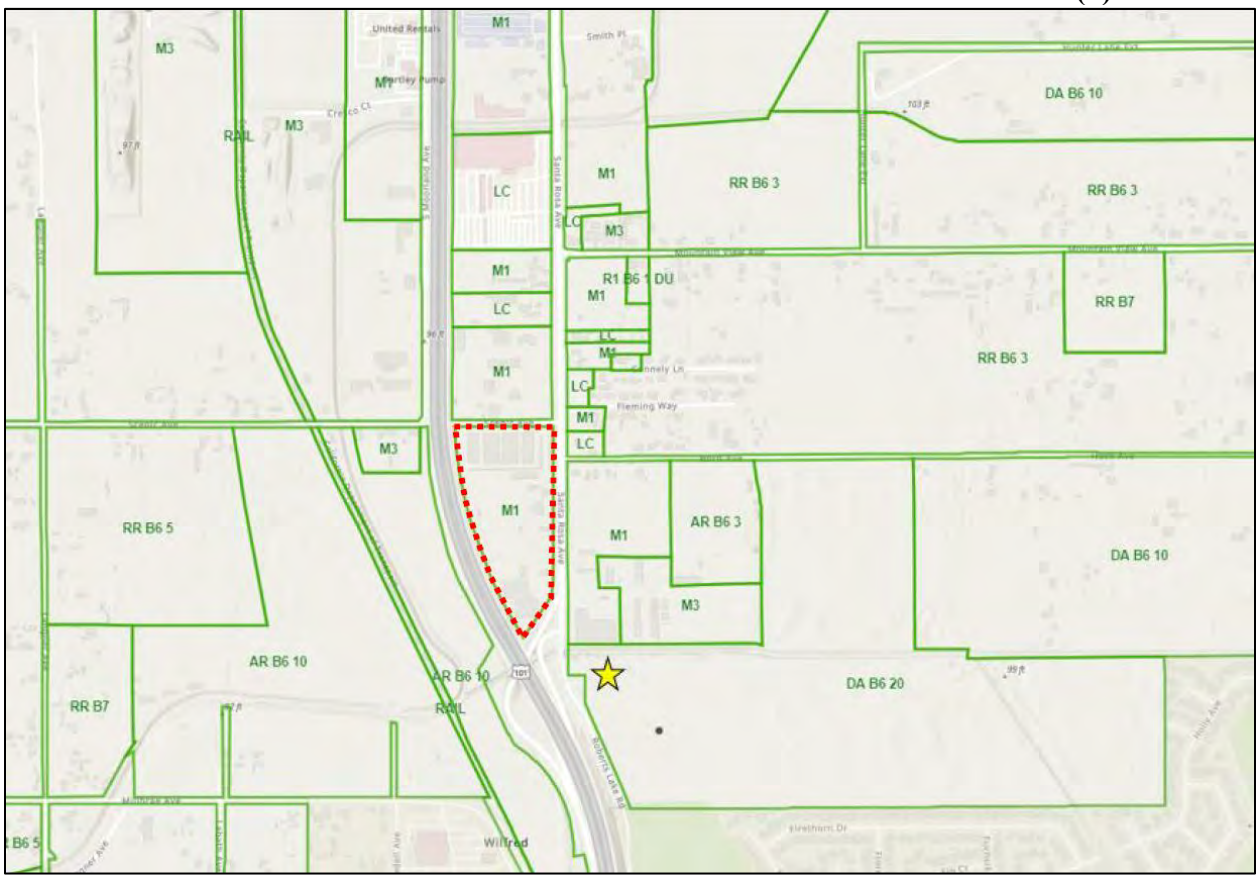
Name: Curtis Auto Recycling & Scrap
Site Address: 4298 Santa Rosa Ave., Santa Rosa, CA 95407
APN: 045-041-028 & 045-041-014
Zone: M3, VOH
Elevation: 98'
Parcel Size: 8.03 acres & 1.00 acre

This parcel is too small to accommodate a freestanding facility and there are no tall buildings on which to collocate.

Name: Pacific Pride Gas Station
Site Address: 4290 Santa Rosa Ave., Santa Rosa, CA 95407
APN: 045-041-017
Zone: M3, VOH
Elevation: 98'
Parcel Size: 0.92 acres

This parcel is too small to accommodate a freestanding facility and there are no tall buildings on which to collocate. Furthermore, due to underground environmental issues, parcels that function as gas stations have historically been less preferred.

ELIMINATED DUE TO NON-RESPONSE FROM PROPERTY OWNER(S)



Note: Project Location noted by yellow star, considered parcels in dotted red.

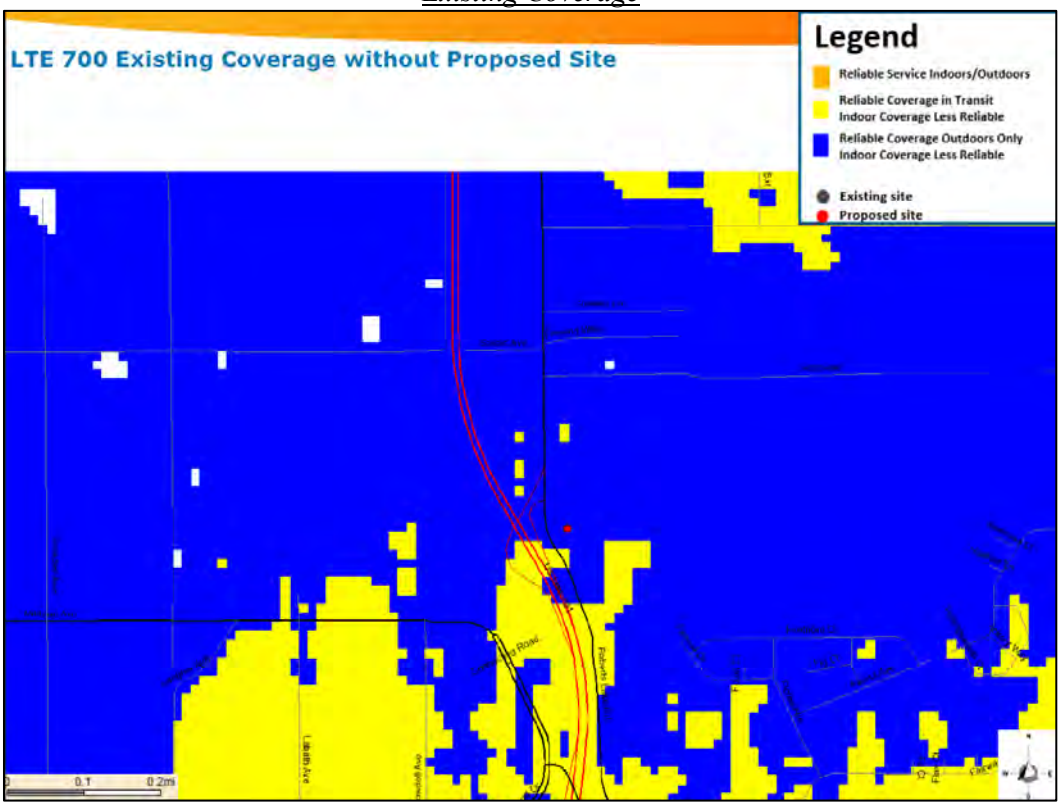
Name:	Eagle Transportation Co.
Site Address:	4325 Santa Rosa Ave, Santa Rosa, CA 95407
APN:	045-034-018
Zone:	M1, RC100/25 SR VOH
Elevation:	98’
Parcel Size:	1.94 acres

The parcel was contacted in January 2019 via phone and mail without a response. Additionally, the layout of the parcel requires that a freestanding facility be placed on the frontage of the property, blocking entrances to the two businesses. Lastly, the warehouses are too short to accommodate a rooftop facility.

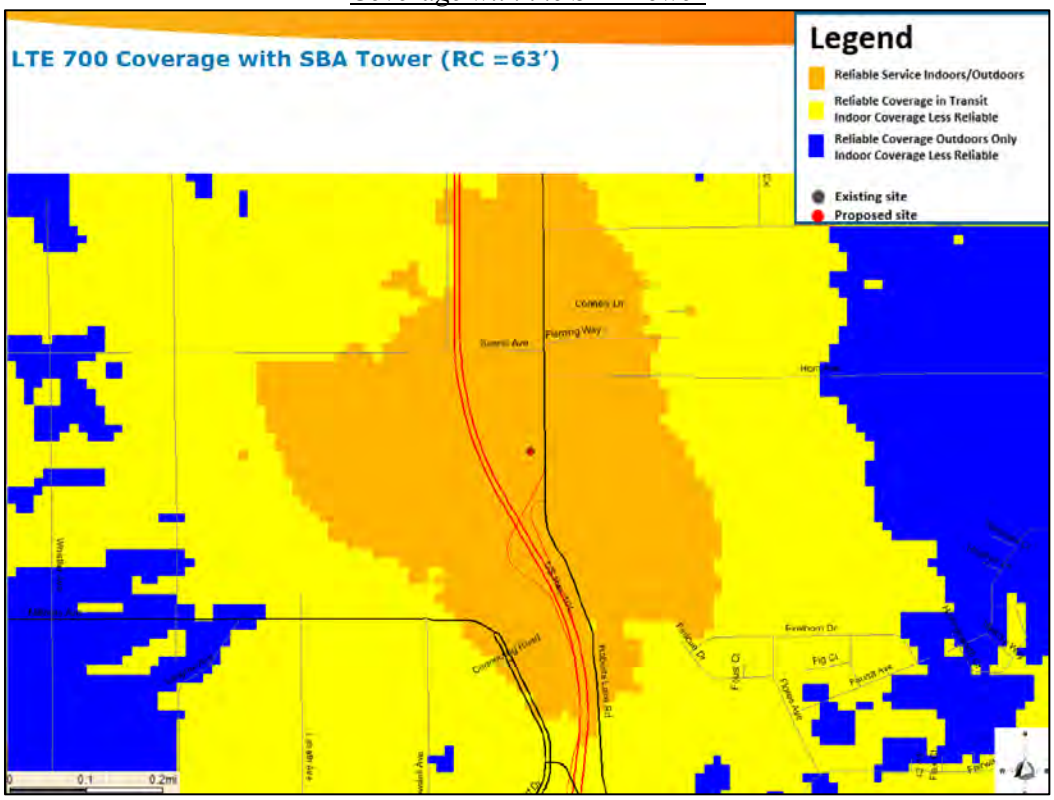
Name:	Yarbrough Brothers Towing
Site Address:	4291 Santa Rosa Ave., Santa Rosa, CA 95407
APN:	045-034-026
Zone:	M1, SR VOH
Elevation:	98’
Parcel Size:	1.04 acres

There is currently a 77’ tall SBA tower, stealthed as a monopine, located at this parcel. The available centerline on this monopine is 63’ and would provide less coverage than the proposed facility.

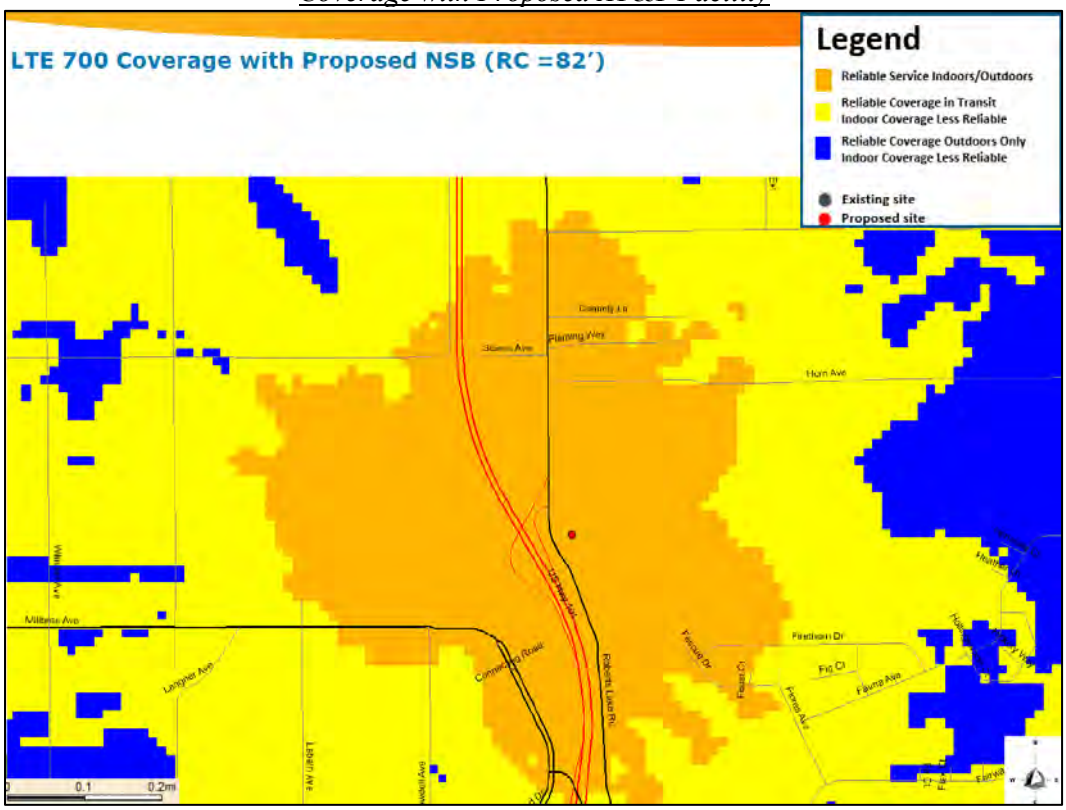
Existing Coverage



Coverage with the SBA Tower



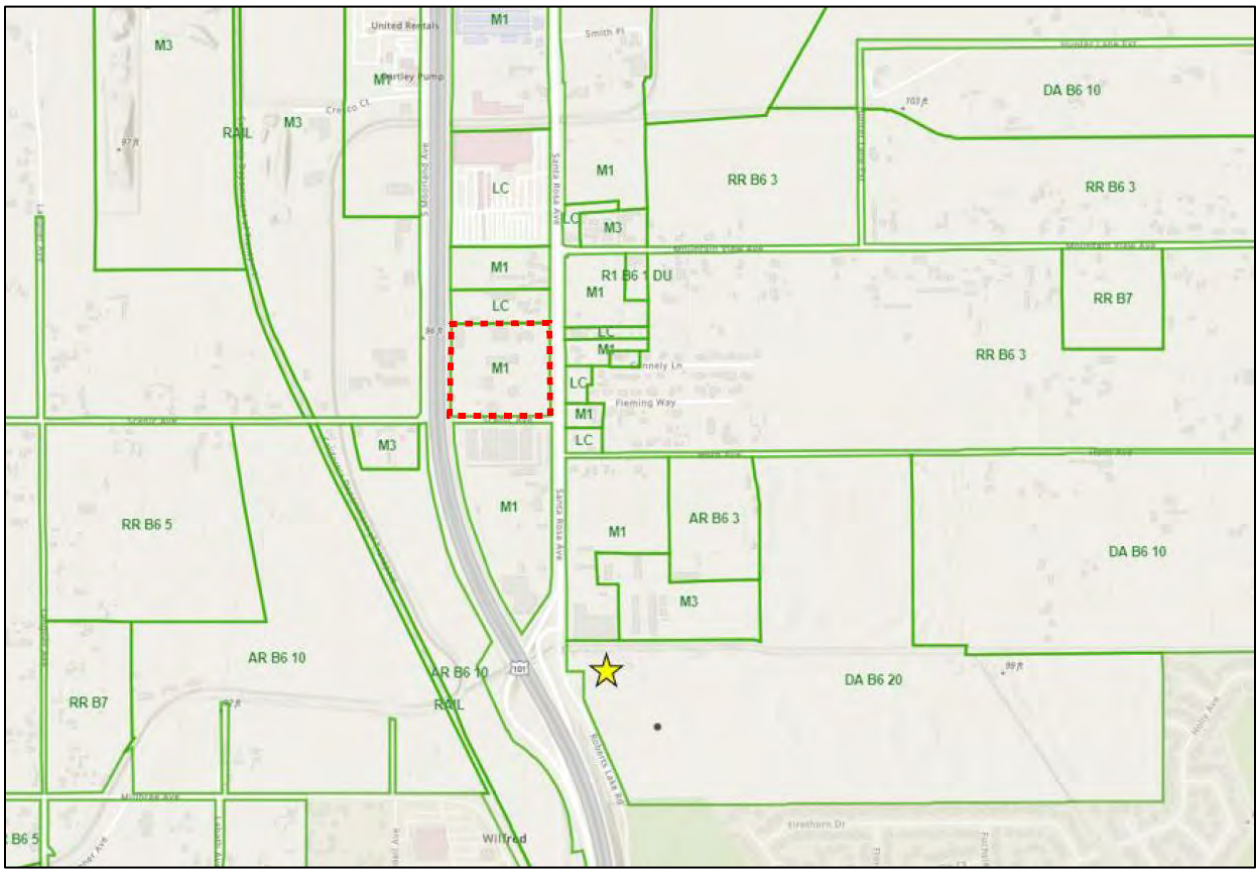
Coverage with Proposed AT&T Facility



Lastly, the current wireless equipment sits behind a fenced enclosure at the base of the existing monopine. However, the existing compound cannot accommodate another carrier's equipment and would require removal of parking or another ground lease area on the parcel, which would greatly impact business during construction. Furthermore, the property owner is unwilling to allow AT&T to use up parking spots in order to expand the ground equipment lease area.

Aerial View of Parcel with SBA Tower

ELIMINATED DUE TO PROPERTY OWNER RETRACTING INTEREST & NONRESPONSE



Note: Project Location noted by yellow star, considered parcels in dotted red.

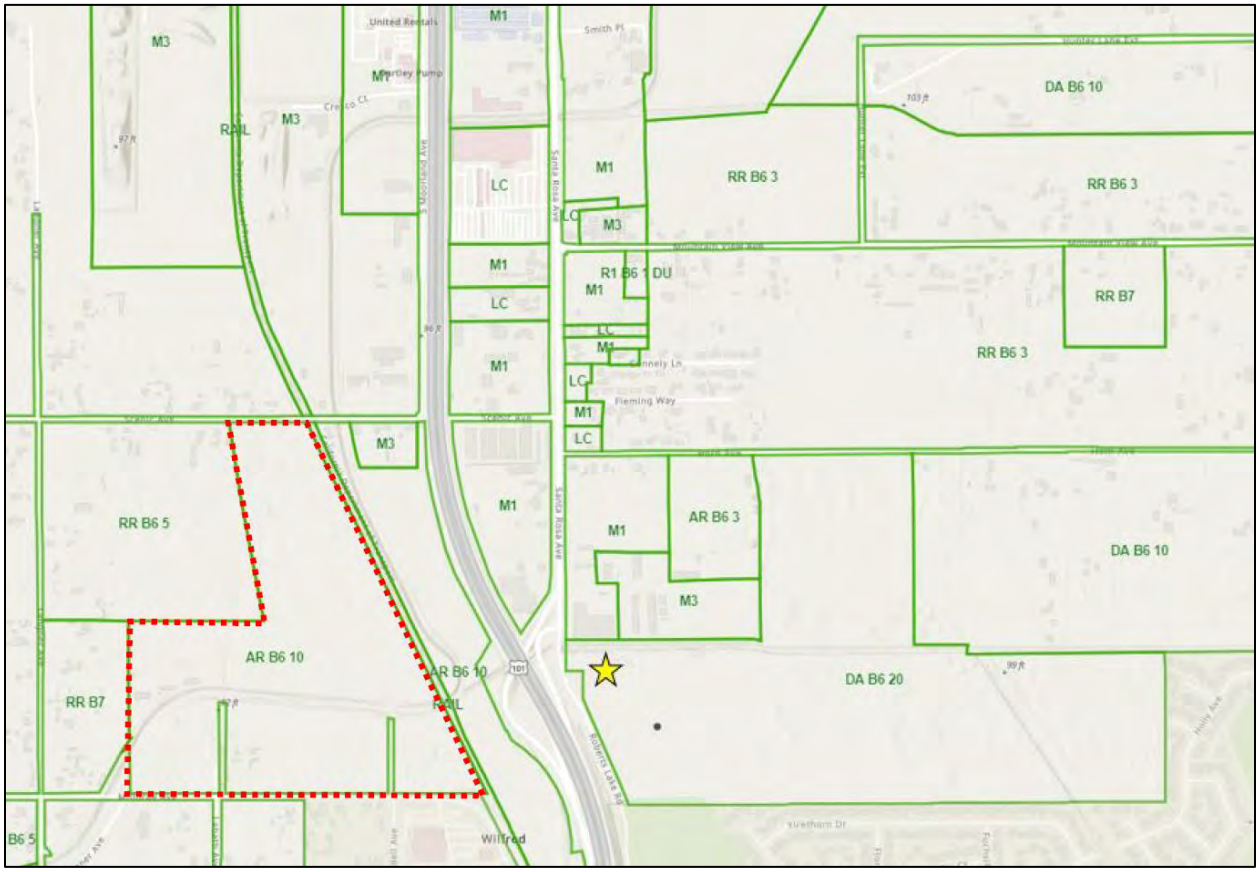
Name: Allied Building Products
Site Address: 4159 Santa Rosa Ave., Santa Rosa, CA 95407
APN: 045-014-019
Zone: M1, SR VOH
Elevation: 99'
Parcel Size: 2.68 acres

The property owner, Jim Brenton, was originally interested as of late January 2020. When Complete Wireless traveled out to the property for a site walk, the property owner retracted his interest via email on February 18, 2020.

Name: Santa Rosa Boat Center
Site Address: 4185 Santa Rosa Ave., Santa Rosa, CA 95407
APN: 045-014-006
Zone: M1, VOH
Elevation: 98'
Parcel Size: 1.83 acres

This property owner was contacted by telephone and mail, but no response was received. As the parcel is used for storage, there is not much space to place equipment without disturbing the property's current use as a forklift operator and boat storage center.

ELIMINATED DUE TO TERRAIN CHALLENGES & PROPERTY OWNER NON-INTEREST



Note: Project Location noted by yellow star, considered parcels in dotted red.

Name:	Sonoma County Ag Preservation
Site Address:	200 Scenic Ave., Santa Rosa, CA 95407
APN:	045-033-044
Zone:	AR B6 10, SR VOH
Elevation:	99’
Parcel Size:	21.15 acres

This property owner was contacted by telephone and mail, but no response was received. As the parcel is very large and undeveloped, any proposed access road, especially since the RF engineer requires a location closer to Hwy 101, would be in excess of 1,500’ and create much of environmental disruption that other possible locations. Lastly, this parcel was in a less preferred zone for telecommunications facilities.

Name: State of California Wildlife Conservation Board
Site Address: Millbrae Avenue, Rohnert Park, CA 95407
APN: 045-033-024
Zone: AR B6 10, RC50/25 SR VOH
Elevation: 99'
Parcel Size: 8.86 acres

This property owner was contacted by telephone and mail, but no response was received. As the parcel is very large and undeveloped, any proposed access road, especially since the RF engineer requires a location closer to Hwy 101, would be in excess of 1,500' and create much of environmental disruption that other possible locations. Lastly, this parcel was in a less preferred zone for telecommunications facilities.

Name: Benham Arshi
Site Address: 195 Millbrae Ave., Santa Rosa, CA 95407
APN: 045-033-025
Zone: AR B6 10, RC50/25 SR VOH
Elevation: 95'
Parcel Size: 20.70 acres

This property owner was interested and negotiations were undertaken. However, during site visits and subsequent discussions, the possible access roads would create issues. Lastly, this parcel was in a less preferred zone for telecommunications facilities. Please see additional explanation below.

ALTERNATIVE FEASIBLE SERVICE PLANS

In accordance with Sonoma County's code, AT&T seeks to demonstrate two feasible alternative service plans which could provide comparable service to the intended service area. Both of these possible candidates produce a minimum quality signal and would not substantially interfere with another service. However, due to leasing and environmental issues, both candidates had to be eliminated from consideration.

Alternative Plan #1
Name: Benham Arshi
Site Address: 195 Millbrae Ave., Santa Rosa, CA 95407
APN: 045-033-025
Zone: AR B6 10, RC50/25 SR VOH
Elevation: 95'
Parcel Size: 20.70 acres

This property owner was interested and negotiations were undertaken. However, during site visits and subsequent discussions, the possible access roads would create long paths from either Labath Avenue or from Millbrae Avenue. Additionally, similar to the environmentally sensitive lands owned by the state's Wildlife Conservation Board nearby, there were environmentally sensitive areas that would be greatly impacted by access road construction. Additionally, these long access roads would also create a great visual impact along the major public rights-of-way. Lastly, the Arshi parcel was in a less preferred zone for telecommunications facilities.

Alternative Plan #2

Name: Allied Building Products
Site Address: 4159 Santa Rosa Ave., Santa Rosa, CA 95407
APN: 045-014-019
Zone: M1, SR VOH
Elevation: 99'
Parcel Size: 2.68 acres

The property owner was interested in having a wireless facility on a particular location on the parcel, along the rear property line closest to Hwy 101. The proposed facility would have been a monopine tree in excess of 100' in order to clear the line of existing tall pine trees along the rear property line. This was the accepted candidate before the property owner suddenly withdrew interest as Complete Wireless was driving to the parcel to conduct a site visit in February 2019.

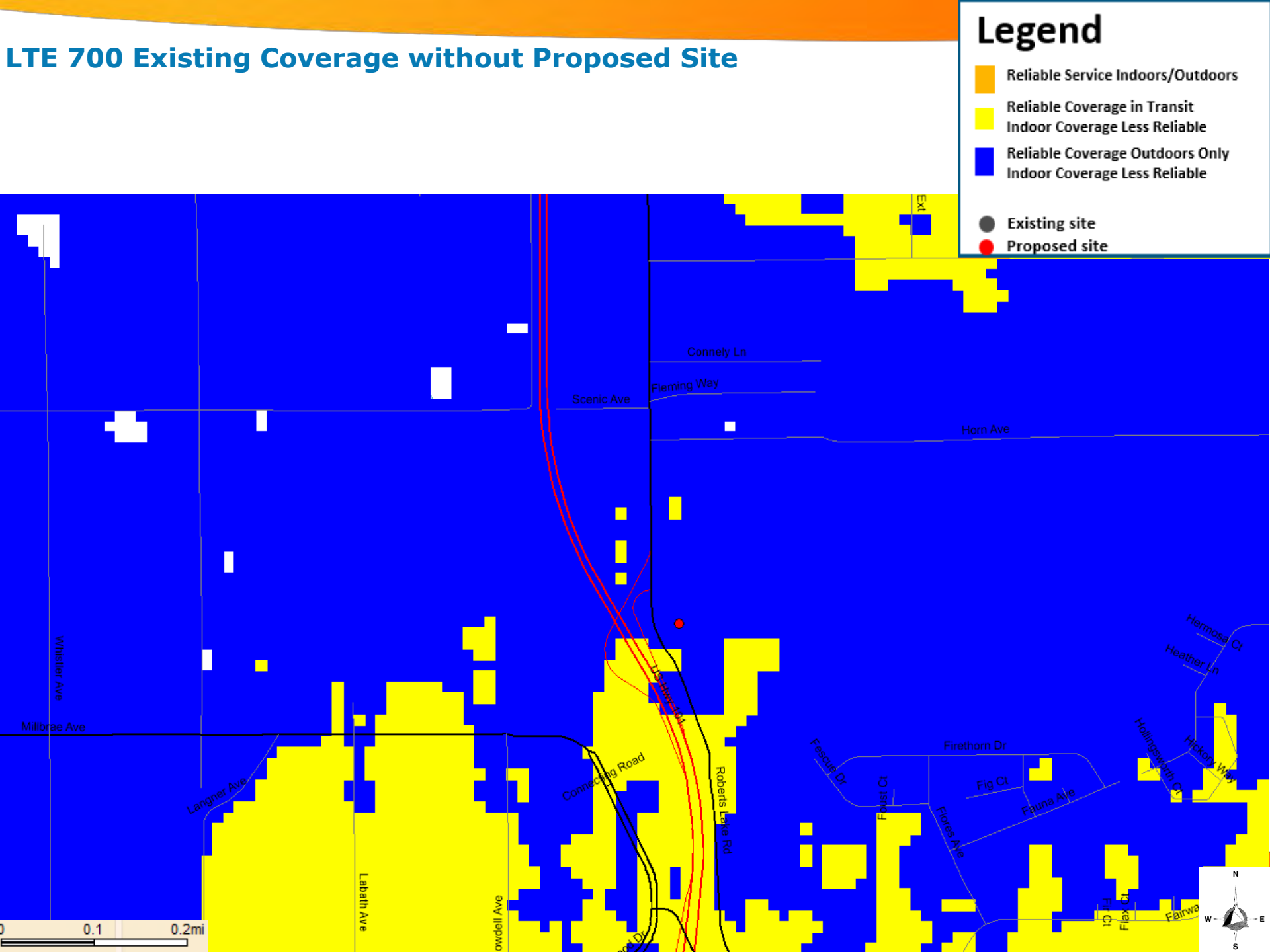
CONCLUSION

After an exhaustive search for potential sites and collocation possibilities and a review of the applicable zoning laws, the proposed candidate at 4515 Santa Rosa Ave. was selected because it is the best available and least intrusive candidate to improve service to the area and to meet the wireless coverage objective in the area lacking coverage along this particular portion of Sonoma County. AT&T has identified this area of Rohnert Park and unincorporated Sonoma County as requiring an additional facility since 2018.

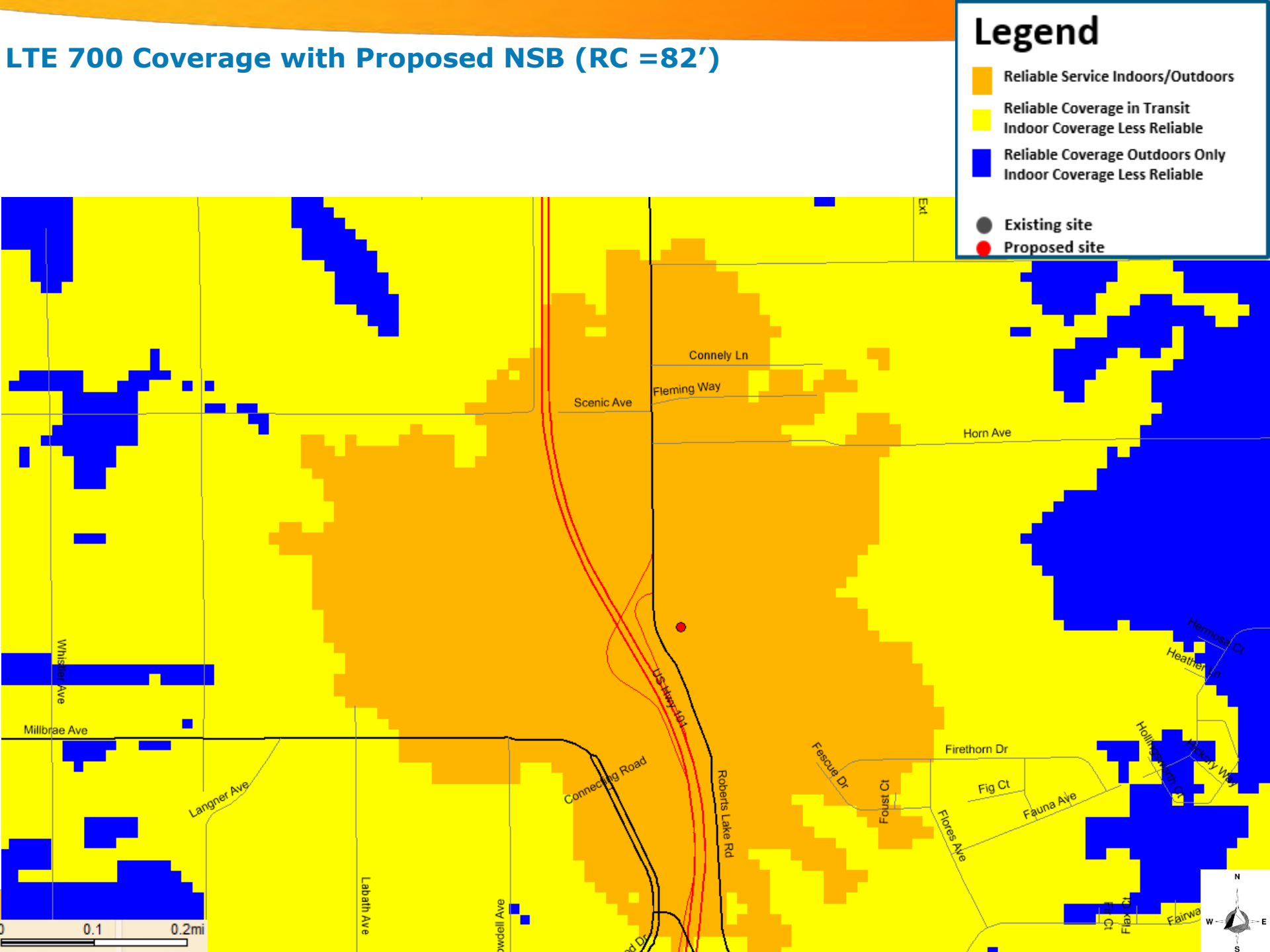
CCL06387 Zoning Propagation Map

Feb 11, 2020

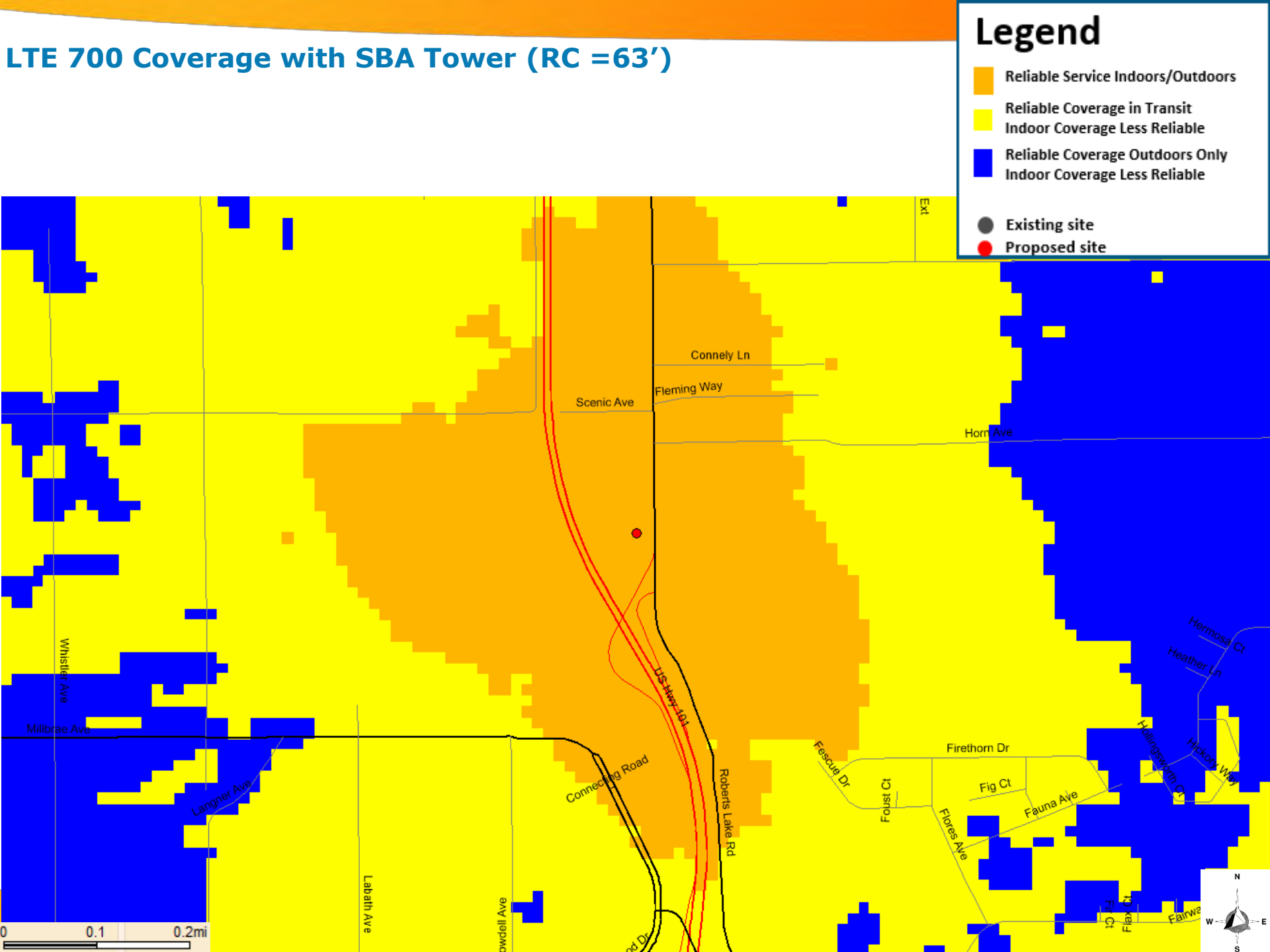
LTE 700 Existing Coverage without Proposed Site



LTE 700 Coverage with Proposed NSB (RC =82')



LTE 700 Coverage with SBA Tower (RC =63')



Environmental Noise Assessment

CCL06387 Santa Rosa Ave & Hwy 101 AT&T Cellular Facility

Santa Rosa (Sonoma County), California

BAC Job # 2019-205

Prepared For:

Complete Wireless Consulting

Attn: Kristin Crandell
2009 V Street
Sacramento, CA 95818

Prepared By:

Bollard Acoustical Consultants, Inc.

Dario Gotchet, Consultant

October 8, 2019

BOLLARD
Acoustical Consultants

Introduction

The CCL06387 Santa Rosa Ave & Hwy 101 AT&T Wireless Unmanned Telecommunications Facility Project (project) proposes the installation of cellular equipment within a lease area located at 4515 Santa Rosa Avenue in Santa Rosa (Sonoma County), California (APN: 045-041-034). The externally mounted HVAC unit of a pre-manufactured concrete walk-in cabinet and an emergency diesel standby generator have been identified as the primary noise sources associated with the project. Please see Figure 1 for the project site location. The studied site drawings are dated September 20, 2019.

Bollard Acoustical Consultants, Inc. (BAC) has been contracted by Complete Wireless Consulting, Inc. to complete an environmental noise assessment regarding the proposed project cellular equipment operations. Specifically, the following assessment addresses daily noise production and exposure associated with operation of the project emergency generator and HVAC equipment.

Please refer to Appendix A for definitions of acoustical terminology used in this report. Appendix B illustrates common noise levels associated with various sources.

Criteria for Acceptable Noise Exposure

Sonoma County General Plan

The Sonoma County General Plan Noise Element (Policy NE-1c) pertains to noise generated by non-transportation noise sources, such as those proposed by the project. The objectives and policies of the Noise Element that are applicable to the proposed project equipment are as follows:

Objective NE-1.1: Provide noise exposure information so that noise impacts may be effectively evaluated in land use planning and project review.

Objective NE-1.2: Develop and implement measures to avoid exposure of people to excessive noise levels.

Objective NE-1.3: Protect the present noise environment and prevent intrusion of new noise sources which would substantially alter the noise environment.

Policy NE-1c: Control non-transportation related noise from new projects. The total noise level resulting from new sources shall not exceed the standards in Table NE-2 of the recommended revised policies as measured at the exterior property line of any adjacent noise sensitive land use. Limit exceptions to the following:

Legend

- Proposed AT&T Cellular Facility Lease Area
- Parcel Boundaries (Approximate)

N

Scale (Feet)

0 250 500

CCL06387 Santa Rosa Ave & Hwy 101
AT&T Cellular Facility
Santa Rosa (Sonoma County), California

Proposed Cellular Facility Lease Area with Adjacent Land Uses and Jurisdictions

Figure 1

BOLLARD Acoustical Consultants

(1) If the ambient noise level exceeds the standard in Table NE-2, adjust the standard to equal the ambient level, up to a maximum of 5 dBA above the standard, provided that no measureable increase (i.e., +/- 1.5 dBA) shall be allowed.

(2) Reduce the applicable standards in Table NE-2 by 5 dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises, such as pile drivers and dog barking at kennels.

(3) Reduce the applicable standards in Table NE-2 by 5 decibels if the proposed use exceeds the ambient level by 10 or more decibels.

(4) For short term noise sources which are permitted to operate no more than six days per year, such as concerts or race events, the allowable noise exposure show in Table NE-2 may be increased by 5 dBA. These events shall be subject to a noise management plan including provisions for maximum noise level limits, noise monitoring, complaint response and allowable hours of operation. The plan shall address potential cumulative noise impacts from all events in the area.

(5) Noise levels may be measured at the location of the outdoor activity area of the noise sensitive land use, instead of the exterior property line of the adjacent noise sensitive land use where:

a. The property on which the noise sensitive use is located has already been substantially developed pursuant to its existing zoning, and

b. There is available open land on those noise sensitive lands for noise attenuation.

Table 1
Maximum Allowable Exterior Noise Exposures for Non-transportation Noise Sources
Hourly Noise Metric, dB

Duration Exceeded, Min.	Statistical Descriptor	Noise Level, dB	
		Daytime (7 AM to 10 PM)	Nighttime (10 PM to 7 AM)
30	L_{50}	50	45
15	L_{25}	55	50
5	L_8	60	55
1	L_2	65	60

Source: Sonoma County 2020 General Plan Noise Element, Table NE-2 (reproduced and summarized)

Rohnert Park Municipal Code

Chapter 9.44 of the Rohnert Park Municipal Code provides noise level criteria applicable to this project. The municipal code assumes a base ambient noise level, depending on the zoning of the receiving land use, from which noise levels can be compared. Section 9.44.040 is reproduced below as Table 2.

Table 2
Ambient Base Noise Level Criteria

Zone	Time	Base Ambient Sound Level (dB)
R1 and R2	10 p.m. to 7 a.m.	45
R1 and R2	7 p.m. to 10 p.m.	40
R1 and R2	7 a.m. to 7 p.m.	55
R3 and R4	10 p.m. to 7 a.m.	50
R3 and R4	7 a.m. to 10 p.m.	55
Commercial	10 p.m. to 7 a.m.	55
Commercial	7 a.m. to 10 p.m.	60
Limited Industrial	Anytime	70
General Industrial	Anytime	75

Source: Rohnert Park Municipal Code, Chapter 9.44 Noise, Section 9.44.040

Section 9.44.110 states that the exterior noise level of machinery and equipment shall not cause the noise level at the property line of any property to exceed the ambient base noise level by more than 5 dB. For this project, the nearest property located within the jurisdiction of Rohnert Park is residentially zoned (Single-Family Dwelling – R1). After application of the 5 dB increase to the ambient base noise levels for R1 and R2 zones presented in Table 2, the resulting noise level standards applicable to the project would be 60 dB (7 a.m. to 7 p.m.), 50 dB (10 p.m. to 7 a.m.), and 45 dB (7 p.m. to 10 p.m.).

Noise Standards Applied to the Project

According to the City of Santa Rosa GIS Viewer, the project parcel and adjacent parcels are under the jurisdiction of Sonoma County. The project parcel is zoned for pasture land uses (General Plan – Agriculture), while the adjacent parcels to the north are zoned for warehousing land uses (General Plan – Retail and Business Services). Warehousing land uses are typically not considered to be noise-sensitive, but rather noise-generating. The nearest noise-sensitive use located within the jurisdiction of Sonoma County has been identified as parcel to the north of the project that contains rural residential uses (APN: 045-041-001). As a result, the Sonoma County General Plan noise level criteria applicable to noise-sensitive uses identified in Table 1 was applied to the proposed project equipment and conservatively assessed at the property line of this parcel. However, the *closest* noise-sensitive use to the project has been identified as a residentially zoned parcel located within the jurisdiction of the City of Rohnert Park to the south (APN: 160-120-009). As a result, the noise level criteria identified in the Rohnert Park Municipal

Code was also applied to the proposed project equipment (Table 2). Figure 1 shows the project location with adjacent land uses and jurisdictions.

HVAC Equipment

Noise would be generated by this project in two ways – the first is the operation of the externally mounted HVAC unit of the pre-manufactured concrete walk-in cabinet. This system utilizes fans to circulate cooling air through the electric circuitry. During warmer periods, the cooling requirements will be greater and the fans will run continuously. During cooler periods, however, the heat transfer requirements are diminished and the fans will run intermittently as needed. Because the fan operation is a normal aspect of the project, and because the fans could run continuously during warm nighttime hours (i.e., more than 30 minutes per hour), the noise standards applied to the HVAC equipment are as follows:

- 50 dB L_{50} at noise-sensitive uses during daytime hours (Sonoma County GP – Table 1)
- 45 dB L_{50} at noise-sensitive uses during nighttime hours (Sonoma County GP – Table 1)
- 60 dB at low-density residential uses during daytime hours (Rohnert Park MC – Table 2)
- 50 dB at low-density residential uses during nighttime hours (Rohnert Park MC – Table 2)
- 45 dB at low-density residential uses during evening hours (Rohnert Park MC – Table 2)

Satisfaction with the more restrictive noise level standards identified above would ensure compliance with the less restrictive noise level limits. As a result, the following analysis of project HVAC equipment noise levels focuses on achieving compliance with the Sonoma County General Plan 45 dB L_{50} nighttime noise standard and the City of Rohnert Park 45 dB evening noise level limit.

Emergency Generator

The project site drawings dated September 20, 2019 indicate that a Generac Industrial Power Systems Model SD030 diesel standby generator is proposed for use at this facility to maintain cellular service during emergency power outages. The noise emissions of this generator vary depending on the type of enclosure provided with the generator. The following reference noise levels at a measurement distance of 23 feet from the operating generator are provided by the equipment manufacturer (see Appendix C):

- Open Set 82 dBA
- Standard Enclosure 77 dBA
- Level 1 Acoustic Enclosure 70 dBA
- Level 2 Acoustic Enclosure 68 dBA

It is our understanding that the project emergency generator, located within the same lease area as the equipment cabinets, will be equipped with a Level 2 Acoustic Enclosure resulting in a reference noise level of 68 dB at 23 feet. Relative to open set generator configuration, the Level 2 Acoustic Enclosure provides 14 dB of noise reduction.

The generator which is proposed at this site would only operate during emergencies (power outages) and brief daytime periods for periodic maintenance/lubrication. According to the project applicant, testing of the generator would occur twice per month, during daytime hours, for a

duration of approximately 15 minutes. The emergency generator would not operate at night, except during power outages.

Exemption to the Sonoma County General Plan Noise Criteria

According to conversations with Sonoma County Permit and Resource Management Department staff (dated August 19, 2019), emergency generators are exempt from county noise level criteria provided that the generators are not part of normal operations and are equipped with best available noise suppression enclosures. As discussed above, it is our understanding that the project emergency generator will be equipped with a Level 2 Acoustic Enclosure, which would provide approximately 14 dB of noise reduction when compared to an open set configuration. In addition, the proposed generator would only operate during emergencies, and brief daytime periods for periodic maintenance. Because the project emergency generator is not part of normal operations, and because the generator is proposed to be equipped with an acoustical enclosure that would significantly reduce equipment noise levels (Level 2 Acoustic Enclosure), noise exposure from project emergency generator operations would be exempt from applicable Sonoma County noise level criteria. As a result, an analysis of project emergency generator noise exposure relative to the Sonoma County General Plan noise level criteria was not included in this assessment. Rather, the following assessment includes an analysis of generator noise exposure relative to the City of Rohnert Park Municipal Code noise level criteria.

Project Noise Generation

As discussed previously, there are two project noise sources which are considered in this evaluation; the externally mounted HVAC unit of the pre-manufactured concrete walk-in cabinet and the emergency diesel generator. The evaluation of potential noise impacts associated with the operation of each noise source is evaluated separately as follows:

HVAC Equipment Noise Source and Reference Noise Level

The project proposes the installation of a pre-manufactured concrete walk-in cabinet equipped with one (1) externally mounted HVAC unit within the equipment lease area illustrated on Figure 1. According to the project applicant, the HVAC unit proposed for the project is a Marvair Airxcel, Inc. Model ECUA18ACA. Based on reference noise level data obtained from the manufacturer (Marvair Airxcel, Inc.), this specific HVAC unit model has a reference noise level of 62 dB at a distance of 5 feet. The manufacturer's noise level data specification sheet for the proposed HVAC equipment is provided as Appendix D.

Generator Noise Source and Reference Noise Level

A Generac Industrial Power Systems Model SD030 (30 kW) is proposed for use at this facility to maintain cellular service during emergency power outages. Based on the project site plans, it is assumed that the proposed generator will be equipped with the Level 2 Acoustic Enclosure resulting in a reference noise level of 68 dB at a distance of 23 feet.

The generator which is proposed at this site would only operate during emergencies (power outages) and brief daytime periods for periodic maintenance/lubrication. According to the project applicant, testing of the generator would occur twice per month, during daytime hours, for a

duration of approximately 15 minutes. The emergency generator would not operate at night, except during power outages.

Predicted Facility Noise Levels at Nearest Noise-Sensitive Uses

Assessment Relative to the Sonoma County General Plan Noise Level Criteria

As indicated in Figure 1, the proposed cellular facility maintains a separation of approximately 1,000 feet from the property line of the nearest noise-sensitive use located within the jurisdiction of Sonoma County (APN: 045-041-001). Assuming standard spherical spreading loss (-6 dB per doubling of distance), project equipment noise exposure at this property line was calculated and the results of those calculations are presented in Table 3.

Table 3
Project-Related Noise Exposure at Nearest Noise-Sensitive Use – Sonoma County

APN[1]	Land Use	Distance from Cellular Facility Lease Area (feet)[2]	Predicted HVAC Equipment Noise Level, L_{50} (dBA)
045-041-001	Rural Residential	1,000	<20

[1] Parcel boundaries are shown on Figure 1.
[2] Distance was scaled using the provided site plans dated September 20, 2019 and the City of Santa Rosa GIS Viewer measurement tool.

The proposed HVAC equipment was conservatively assumed to be in operation for the duration of an hour during nighttime hours. According to the Sonoma County General Plan (Table 1), the corresponding noise level standard given an hour of *nighttime* operation would be 45 dB L_{50}. As shown in Table 3, the predicted HVAC equipment noise level of less than 20 dB L_{50} at the nearest noise-sensitive (residential) use within the jurisdiction of Sonoma County would satisfy the applicable General Plan 45 dB L_{50} nighttime noise level standard by a wide margin. As a result, no further consideration of project equipment noise mitigation measures would be warranted for the project relative to the Sonoma County General Plan noise level criteria.

Assessment Relative to the City of Rohnert Park Municipal Code Noise Level Criteria

As shown in Figure 1, the proposed cellular facility maintains a separation of approximately 1,200 feet from the property line of the nearest noise-sensitive use (APN: 060-120-009), located within the City of Rohnert Park jurisdiction. Assuming standard spherical spreading loss (-6 dB per doubling of distance), project equipment noise exposure at the property line of this parcel was calculated and the results of those calculations are presented in Table 4.

Table 4
Project-Related Noise Exposure at Nearest Noise-Sensitive Use – Rohnert Park

APN[1]	Land Use	Distance from Cellular Facility Lease Area (feet)[2]	Predicted Equipment Noise Levels (dBA)	
			HVAC	Generator
060-120-009	Residential	1,200	<20	34

[1] Parcel boundaries are shown on Figure 1.
[2] Distance was scaled using the provided site plans dated September 20, 2019.

The Table 4 data indicates that the predicted HVAC equipment noise level of less than 20 dB at the property line of APN: 060-120-009 would satisfy the City of Rohnert Park Municipal Code 45 dB evening noise level standard for low-density residential uses by a wide margin. Further, the predicted emergency generator noise level of 34 dB at this same property line would also satisfy the Municipal Code 45 dB evening noise level limit. As a result, no further consideration of project equipment noise mitigation measures would be warranted for the project relative to the City of Rohnert Park Municipal Code noise level criteria.

Conclusions

According to conversations with Sonoma County Permit and Resource Management Department staff (dated August 19, 2019), emergency generators are exempt from applicable county noise level criteria provided that they are not part of normal operations and are equipped with best available noise suppression enclosures. Because the project emergency generator will not be part of normal facility operations, and because the generator is proposed to be equipped with an acoustical enclosure that would significantly reduce equipment noise levels (Level 2 Acoustic Enclosure), noise exposure from project emergency generator operations would be exempt from applicable Sonoma County General Plan noise level criteria.

Based on the equipment noise level data and analyses presented above, project equipment noise level exposure is expected to satisfy the applicable Sonoma County General Plan and City of Rohnert Park Municipal Code noise exposure limits at the property lines of the closest noise-sensitive uses. As a result, no additional equipment noise mitigation measures would be warranted for this project.

This concludes our environmental noise assessment for the proposed CCL06387 Santa Rosa Ave & Hwy 101 AT&T Cellular Facility in Santa Rosa (Sonoma County), California. Please contact BAC at (916) 663-0500 or dariog@bacnoise.com with any questions or requests for additional information.

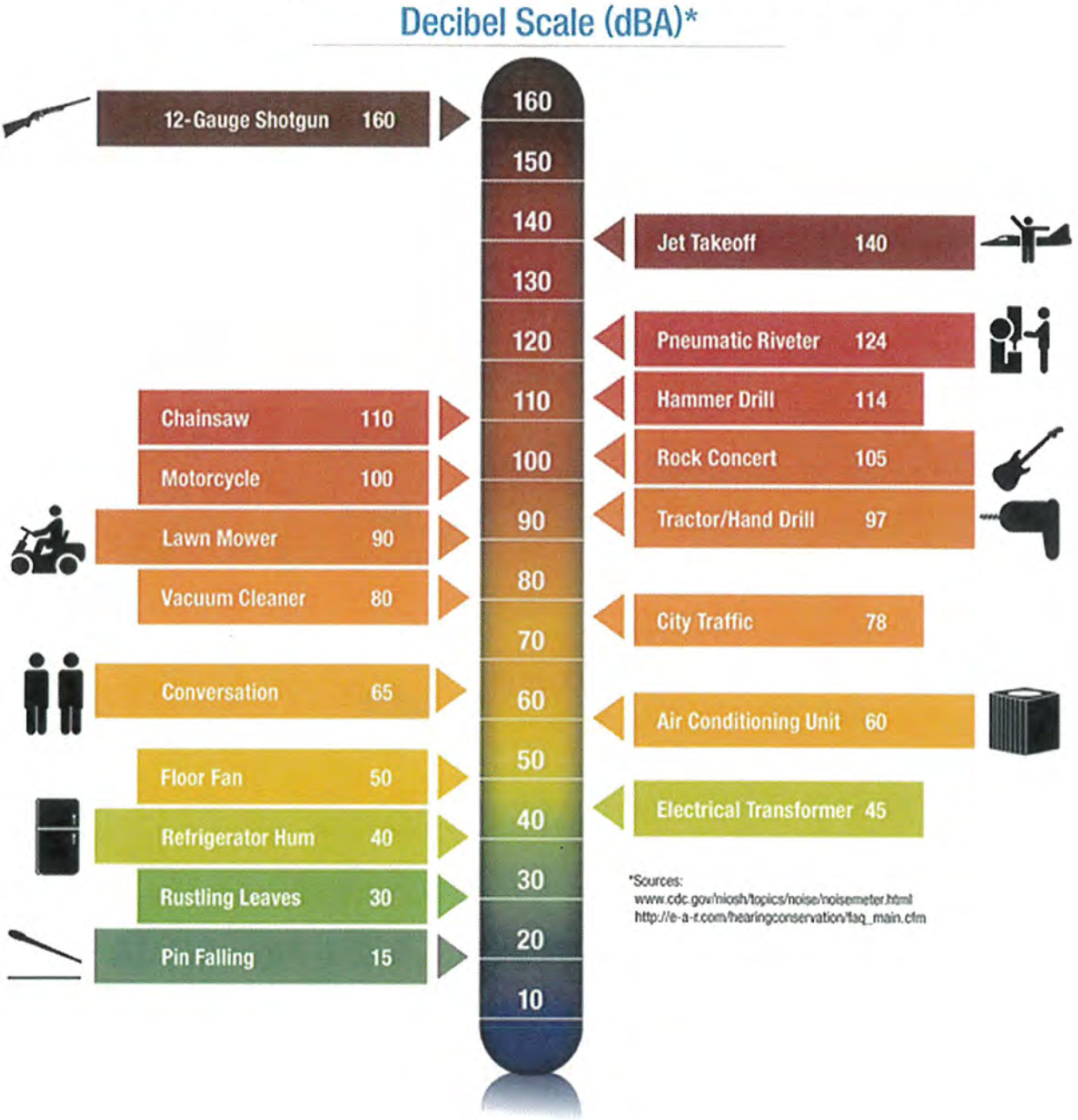
Appendix A

Acoustical Terminology

Acoustics	The science of sound.
Ambient Noise	The distinctive acoustical characteristics of a given space consisting of all noise sources audible at that location. In many cases, the term ambient is used to describe an existing or pre-project condition such as the setting in an environmental noise study.
Attenuation	The reduction of an acoustic signal.
A-Weighting	A frequency-response adjustment of a sound level meter that conditions the output signal to approximate human response.
Decibel or dB	Fundamental unit of sound, A Bell is defined as the logarithm of the ratio of the sound pressure squared over the reference pressure squared. A Decibel is one-tenth of a Bell.
CNEL	Community Noise Equivalent Level. Defined as the 24-hour average noise level with noise occurring during evening hours (7 - 10 p.m.) weighted by a factor of three and nighttime hours weighted by a factor of 10 prior to averaging.
Frequency	The measure of the rapidity of alterations of a periodic signal, expressed in cycles per second or hertz.
Ldn	Day/Night Average Sound Level. Similar to CNEL but with no evening weighting.
Leq	Equivalent or energy-averaged sound level.
Lmax	The highest root-mean-square (RMS) sound level measured over a given period of time.
Loudness	A subjective term for the sensation of the magnitude of sound.
Masking	The amount (or the process) by which the threshold of audibility is for one sound is raised by the presence of another (masking) sound.
Noise	Unwanted sound.
Peak Noise	The level corresponding to the highest (not RMS) sound pressure measured over a given period of time. This term is often confused with the Maximum level, which is the highest RMS level.
RT_{60}	The time it takes reverberant sound to decay by 60 dB once the source has been removed.
Sabin	The unit of sound absorption. One square foot of material absorbing 100% of incident sound has an absorption of 1 sabin.
SEL	A rating, in decibels, of a discrete event, such as an aircraft flyover or train passby, that compresses the total sound energy of the event into a 1-s time period.
Threshold of Hearing	The lowest sound that can be perceived by the human auditory system, generally considered to be 0 dB for persons with perfect hearing.
Threshold of Pain	Approximately 120 dB above the threshold of hearing.

Appendix B

Typical A-Weighted Sound Levels of Common Noise Sources



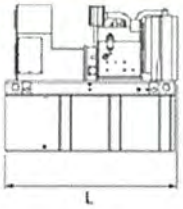
Appendix C

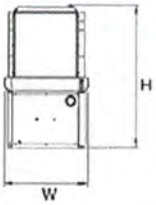
GENERAC | INDUSTRIAL POWER

30 kW Diesel

SD030

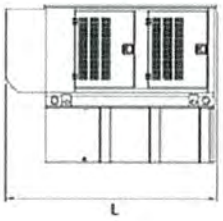
dimensions, weights and sound levels

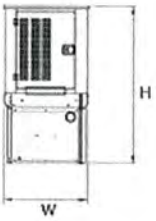




OPEN SET

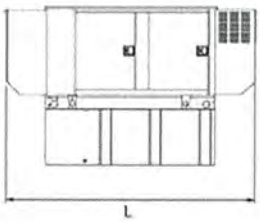
RUN TIME HOURS	USABLE CAPACITY (GAL)	L	W	H	WT	dBA*
NO TANK	-	76	38	46	2060	82
20	54	76	38	59	2540	
48	132	76	38	71	2770	
77	211	76	38	83	2979	
109	300	93	38	87	3042	

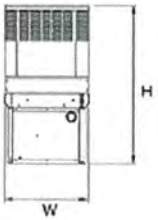




STANDARD ENCLOSURE

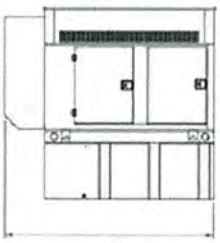
RUN TIME HOURS	USABLE CAPACITY (GAL)	L	W	H	WT	dBA*
NO TANK	-	95	38	50	2362	77
20	54	95	38	63	2842	
48	132	95	38	75	3072	
77	211	95	38	87	3281	
109	300	95	38	91	3344	

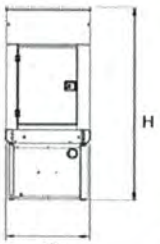




LEVEL 1 ACOUSTIC ENCLOSURE

RUN TIME HOURS	USABLE CAPACITY (GAL)	L	W	H	WT	dBA*
NO TANK	-	113	38	50	2615	70
20	54	113	38	63	2995	
48	132	113	38	75	3225	
77	211	113	38	87	3434	
109	300	113	38	91	3497	





LEVEL 2 ACOUSTIC ENCLOSURE

RUN TIME HOURS	USABLE CAPACITY (GAL)	L	W	H	WT	dBA*
NO TANK	-	95	38	62	2520	68
20	54	95	38	75	3000	
48	132	95	38	87	3230	
77	211	95	38	99	3439	
109	300	95	38	103	3502	

*All measurements are approximate and for estimation purposes only. Weights are without fuel in tank. Sound levels measured at 23ft (7m) and does not account for ambient site conditions.

Tank Options

○	MDEQ	OPT
○	Florida DERM/DEP	OPT
○	Chicago Fire Code	OPT
○	IFC Certification	CALL
○	ULC	CALL

Other Custom Options Available from your Generac Industrial Power Dealer

YOUR FACTORY RECOGNIZED GENERAC INDUSTRIAL DEALER

Specification characteristics may change without notice. Dimensions and weights are for preliminary purposes only. Please consult a Generac Power Systems Industrial Dealer for detailed installation drawings.

Generac Power Systems, Inc. • S45 W29290 HWY. 59, Waukesha, WI 53189 • generac.com

Appendix D

Marvair

156 Seedling Drive
Cordele, Georgia 31015
229-273-0753

Sound Pressure Level for the Industrial Product Air Conditioners (dBA)						
Distance From Unit (Feet)	Model Number					
	ECUA06ACA	ECUA08ACA	ECUA012ACA	ECUA018ACA		
5			51.5	62		
10			50.7	58		
20			47.8	55		
30			46.5	51		
40			45.6			
50			45.6			
60						
70						
80						

Notes: (1) Date: July 1,2019
(2) Background Sound Pressure Level: 41 dBA
(3) Sound Level Meter 1 Meter Above Ground Directly in Line with Outdoor Coil
(4) All units - 410A Refrigerant

AT&T Santa Rosa Avenue

Biological Resources Assessment

March 2020 | CWI-04

Prepared for:

Complete Wireless Consulting
Steve Proo
2009 V Street
Sacramento, CA 95818

Prepared by:

HELIX Environmental Planning, Inc.
1677 Eureka Road, Suite 100
Roseville, CA 95661

AT&T Santa Rosa Avenue

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ACRONYMS AND ABBREVIATIONS

BRA	Biological Resources Assessment
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CSA	California Special Animals
CWA	Clean Water Act
DBH	diameter at breast height
EPA	U.S. Environmental Protection Agency
FESA	Federal Endangered Species Act
HCP	Habitat Conservation Plan
HELIX	HELIX Environmental Planning, Inc.
IPaC	Information for Planning and Consultation
MBTA	Migratory Bird Treaty Act
MSL	mean sea level
NCCP	Natural Community Conservation Plan
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NPPA	Native Plant Protection Act
NRCS	Natural Resource Conservation Service
OHWM	ordinary high water mark
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SSC	Species of Special Concern
SWRCB	State Water Resources Control Board
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WOTUS	Waters of the U.S.

EXECUTIVE SUMMARY

HELIX Environmental Planning, Inc. (HELIX) biologists Christine Heckler and Halie Goeman conducted a Biological Resources Assessment (BRA) on February 25, 2020 for the AT&T Santa Rosa Avenue project (Project) located between the cities of Santa Rosa and Rohnert Park in Sonoma County, California. The site is located within the Rancho Cotate Land Grant on the United States Geological Survey (USGS) 7.5-minute series *Cotati* quadrangle. The approximate location of the site is -122.712983 West and 38.371887 North (Study Area).

The purpose of this BRA is to assess the general biological resources on the site, to assess the suitability of the site to support special-status species and sensitive vegetation communities or habitats, and to provide recommendations for any regulatory permitting or further analysis that may be required prior to development activities occurring on the site.

The ±0.68-acre Study Area is located in a semi-developed setting, immediately east of Santa Rosa Avenue and approximately 200 feet east of U.S. Highway 101. The Study Area is comprised of ruderal/disturbed habitat (approximately 0.57 acre), developed areas (approximately 0.10 acre), and a drainage canal (approximately 0.01 acre). Several homeless encampments were present within the Study Area at the time of the field survey, as well as associated trash and disturbance. Surrounding land uses include commercial developments, residential housing, and seasonal wetlands.

Known or potential biological constraints in the Study Area include:

- Potential habitat for special-status plants including Sonoma alopecurus;
- Potential aquatic habitat for California red-legged frog;
- Potential aquatic habitat for western pond turtle;
- Potential upland habitat for California tiger salamander and within designated critical habitat;
- Potential nesting and/or foraging habitat for migratory birds, other birds and raptors, and special-status birds including white-tailed kite; and
- Potential impacts to aquatic resources.

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1.0 INTRODUCTION

This report summarizes the findings of a Biological Resources Assessment (BRA) completed by HELIX Environmental Planning, Inc. (HELIX) for the ±0.68-acre AT&T Santa Rosa Avenue project (Project) located between the cities of Santa Rosa and Rohnert Park in Sonoma County, California. This document addresses the onsite physical features, plant communities present, and the common plant and wildlife species occurring or potentially occurring in the Study Area. In addition, the suitability of habitats to support special-status species and sensitive habitats are analyzed, and recommendations are provided for any regulatory permitting or further analysis required prior to development activities occurring on the site.

1.1 PROJECT DESCRIPTION

Under the proposed Project, a ±96-foot monopine tower with associated telecommunications equipment, a premanufactured walk-in cabinet, a 30kW diesel standby generator, and other miscellaneous telecommunications equipment will be installed within a 40-foot by 40-foot AT&T lease zone. A chain link fence will be installed around the lease zone and a 20-foot wide gravel driveway will be installed from Santa Rosa Avenue to the 40-foot by 40-foot AT&T lease zone. In addition, a ±130-foot underground power/telco line is proposed from the AT&T lease zone to an existing utility pole.

2.0 REGULATORY FRAMEWORK

Federal, State, and local environmental laws, regulations, and policies relevant to the California Environmental Quality Act (CEQA) review process are summarized below. Applicable CEQA significance criteria are also addressed in this section.

2.1 FEDERAL REGULATIONS

2.1.1 Federal Endangered Species Act

The U.S. Congress passed the Federal Endangered Species Act (FESA) in 1973 to protect species that are endangered or threatened with extinction. FESA is intended to operate in conjunction with the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend.

FESA prohibits the “take” of endangered or threatened wildlife species. “Take” is defined to include harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (FESA Section 3 [(3) (19)]). Harm is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns (50 CFR §17.3). Harass is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns (50 CFR §17.3). Actions that result in take can result in civil or criminal penalties.

In the context of the proposed Project, FESA consultation with the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS) would be initiated if development resulted in the potential for take of a threatened or endangered species or if issuance of a Section 404 permit or other

federal agency action could result in take of an endangered species or adversely modify critical habitat of such a species.

2.1.2 Migratory Bird Treaty Act

Raptors, migratory birds, and other avian species are protected by a number of State and federal laws. The federal Migratory Bird Treaty Act (MBTA) prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior.

2.1.3 The Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (Eagle Act) prohibits the taking or possession of and commerce in bald and golden eagles with limited exceptions. Under the Eagle Act, it is a violation to "*take, possess, sell, purchase, barter, offer to sell, transport, export or import, at any time or in any manner, any bald eagle commonly known as the American eagle, or golden eagle, alive or dead, or any part, nest, or egg, thereof.*" Take is defined to include pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, and disturb. Disturb is further defined in 50 CFR Part 22.3 as "*to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.*"

2.2 STATE JURISDICTION

2.2.1 California Endangered Species Act

The State of California enacted the California Endangered Species Act (CESA) in 1984. CESA is similar to the FESA but pertains to State-listed endangered and threatened species. CESA requires state agencies to consult with the California Department of Fish and Wildlife (CDFW), when preparing CEQA documents. The purpose is to ensure that the State lead agency actions do not jeopardize the continued existence of a listed species or result in the destruction, or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available (Fish and Game Code §2080). CESA directs agencies to consult with CDFW on projects or actions that could affect listed species. It also directs CDFW to determine whether jeopardy would occur and allows CDFW to identify "reasonable and prudent alternatives" to the project consistent with conserving the species. CESA allows CDFW to authorize exceptions to the State's prohibition against take of a listed species if the "take" of a listed species is incidental to carrying out an otherwise lawful project that has been approved under CEQA (Fish & Game Code § 2081).

2.2.2 California Department of Fish and Game Codes

A number of species have been designated as "fully protected" species under Sections 5515, 5050, 3511, and 4700 of the Fish and Game Code, but are not listed as endangered (Section 2062) or threatened (Section 2067) species under CESA. Except for take related to scientific research, all take of fully protected species is prohibited. The California Fish and Game Code defines take as "*hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.*" Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibits the killing of birds or the destruction of bird nests.

2.2.3 Native Plant Protection Act

The Native Plant Protection Act (NPPA), enacted in 1977, allows the Fish and Game Commission to designate plants as rare or endangered. The NPPA prohibits take of endangered or rare native plants, with some exceptions for agricultural and nursery operations and emergencies. Vegetation removal from canals, roads, and other sites, changes in land use, and certain other situations require proper advance notification to CDFW.

2.3 JURISDICTIONAL WATERS

2.3.1 Federal Jurisdiction

depressional wetlands that occur along the Atlantic coastal plain.

(iii) ***Pocosins.*** Pocosins are evergreen shrub and tree dominated wetlands found predominantly along the Central Atlantic coastal plain.

(iv) ***Western vernal pools.*** Western vernal pools are seasonal wetlands located in parts of California and associated with topographic depression, soils with poor drainage, mild, wet winters and hot, dry summers.

(v) ***Texas coastal prairie wetlands.*** Texas coastal prairie wetlands are freshwater wetlands that occur as a mosaic of depressions, ridges, intermound flats, and mima mound wetlands located along the Texas Gulf Coast.

(8) All waters located within the 100-year floodplain of a water identified in paragraphs (a)(1) through (3) of this section and all waters located within 4,000 feet of the high tide line or ordinary high water mark of a water identified in paragraphs (a)(1) through (5) of this section where they are determined on a case-specific basis to have a significant nexus to a water identified in paragraphs (a)(1) through (3) of this section. For waters determined to have a significant nexus, the entire water is a water of the United States if a portion is located within the 100-year floodplain of a water identified in paragraphs (a)(1) through (3) of this section or within 4,000 feet of the high tide line or ordinary high water mark. Waters identified in this paragraph shall not be combined with waters identified in paragraph (a)(6) of this section when performing a significant nexus analysis. If waters identified in this paragraph are also an adjacent water under paragraph (a)(6), they are an adjacent water and no case-specific significant nexus analysis is required.

Within non-tidal waters that meet the definition given above, and in the absence of adjacent wetlands, the indicator used by the USACE to determine the lateral extent of its jurisdiction is the ordinary high water mark (OHWM), which is defined as that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

Wetlands are defined under the CFR Part 328.3 as those areas that are inundated or saturated by surface or ground water at a frequency and duration to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

The USACE has determined that not all features which meet the WOTUS definition are, in fact, considered WOTUS. Normally, features not considered WOTUS include:

(1) Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the Clean Water Act.

(2) Prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with the U.S. Environmental Protection Agency (EPA).

(3) The following ditches:

(i) Ditches with ephemeral flow that are not a relocated tributary or excavated in a tributary.

(ii) Ditches with intermittent flow that are not a relocated tributary, excavated in a tributary, or drain wetlands.

(iii) Ditches that do not flow, either directly or through another water, into a water identified in paragraphs (a)(1) through (3) of this section.

(4) The following features:

(i) Artificially irrigated areas that would revert to dry land should application of water to that area cease;

(ii) Artificial, constructed lakes and ponds created in dry land such as farm and stock watering ponds, irrigation ponds, settling basins, fields flooded for rice growing, log cleaning ponds, or cooling ponds;

(iii) Artificial reflecting pools or swimming pools created in dry land;

(iv) Small ornamental waters created in dry land;

(v) Water-filled depressions created in dry land incidental to mining or construction activity, including pits excavated for obtaining fill, sand, or gravel that fill with water;

(vi) Erosional features, including gullies, rills, and other ephemeral features that do not meet the definition of tributary, non-wetland swales, and lawfully constructed grassed waterways; and

(vii) Puddles.

(5) Groundwater, including groundwater drained through subsurface drainage systems.

(6) Stormwater control features constructed to convey, treat, or store stormwater that are created in dry land.

(7) Wastewater recycling structures constructed in dry land; detention and retention basins built for wastewater recycling; groundwater recharge basins; percolation ponds built for wastewater recycling; and water distributary structures built for wastewater recycling.

Other features may be excluded based on Federal court rulings (e.g., SWANCC and Rapanos) or by regulation.

Permits, licenses, variances, or similar authorization may also be required by other federal, state, and local statutes. Section 10 of the Rivers and Harbors Act of 1899 prohibits the obstruction or alteration of navigable WOTUS without a permit from the USACE (33 USC 403).

On January 23, 2020 the EPA and the USACE finalized the Navigable Waters Protection Rule to define Waters of the U.S. and establish federal regulatory authority under the Clean Water Act. The rule will become effective 60 days after publication in the *Federal Register*. To date, the rule has not yet been published.

2.3.2 State Jurisdiction

Regional Water Quality Control Board

Discharges of fill or waste material to waters of the State are regulated by the State Water Resources Control Board (SWRCB) through its Regional Water Quality Control Board (RWQCB) under Section 401 of the CWA and the Porter-Cologne Water Quality Control Act (contained in the California Water Code). All waters of the U.S. are also considered waters of the State. In addition, other aquatic features that are not subject to USACE jurisdiction, such as roadside ditches or isolated wetlands, may be considered waters of the State. This determination will be made by RWQCB staff on a case-by-case basis.

Section 401 of the CWA requires an applicant to obtain "water quality certification" to ensure compliance with State water quality standards before certain federal licenses or permits may be issued. Section 13260(a) of the Porter-Cologne Water Quality Control Act requires any person discharging waste, including dredged or fill material, or proposing to discharge waste, other than to a community sewer system, within any region that could affect the quality of the waters of the State (all surface and subsurface waters) to file a report of waste discharge. The permits subject to Section 401 include CWA Section 404 permits issued by the USACE. Waste discharge requirements under the Porter-Cologne Water Quality Control Act were typically waived for projects that required certification. Discharges to waters of the State that are not subject to a CWA Section 404 permit rely on the report of waste discharge process.

On April 2, 2019, the SWRCB adopted a State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures), for inclusion in the forthcoming Water Quality Control Plan for Inland Surface Waters and Enclosed Bays and Estuaries and Ocean Waters of California. The Procedures consist of four major elements: 1) a wetland definition; 2) a framework for determining if a feature that meets the wetland definition is a water of the state; 3) wetland delineation procedures; and 4) procedures for the submittal, review and approval of applications for Water Quality Certifications and Waste Discharge Requirements for dredge or fill activities. The Office of Administrative Law approved the Procedures on August 28, 2019, and the Procedures will become effective on May 28, 2020. The SWRCB will circulate draft implementation Guidance on the Procedures in January/February 2020, with final Guidance anticipated in March/April 2020.

Under the Procedures and the State Water Code (Water Code §13050(e)), "waters of the State" are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state." Unless excluded by the Procedures, any activity that could result in discharge of dredged or fill material to waters of the State, which includes waters of the U.S. and non-federal waters of the State, requires filing of an application under the Procedures.

California Department of Fish and Wildlife

The CDFW is a trustee agency that has jurisdiction under Section 1600 *et seq.* of the California Fish and Game Code. Under Sections 1602 and 1603, a private party must notify CDFW if a proposed project will "substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds…except when the department has been notified pursuant to Section 1601." Additionally, CDFW asserts jurisdiction over native riparian habitat adjacent to aquatic features, including native trees over four inches in diameter at breast height (DBH). If an existing fish or wildlife resource may be

substantially adversely affected by the activity, CDFW may propose reasonable measures that will allow protection of those resources. If these measures are agreeable to the parties involved, they may enter into an agreement with CDFW identifying the approved activities and associated mitigation measures. Generally, CDFW recommends submitting an application for a Streambed Alteration Agreement (SAA) for any work done within the lateral limit of water flow or the edge of riparian vegetation, whichever is greater.

2.4 CEQA SIGNIFICANCE

Section 15064.7 of the State CEQA Guidelines encourages local agencies to develop and publish the thresholds that the agency uses in determining the significance of environmental effects caused by projects under its review. However, agencies may also rely upon the guidance provided by the expanded Initial Study Checklist included in Appendix G of the State CEQA Guidelines. Appendix G provides examples of impacts that would normally be considered significant. Based on these examples, impacts to biological resources would normally be considered significant if the project would:

- 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 CDFW or USFWS;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS;
- Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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; and
- Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional or state habitat conservation plan.

An evaluation of whether or not an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be those that would diminish or result in the loss of an important biological resource, or those that would obviously conflict with local, State, or federal resource conservation plans, goals, or regulations. Impacts are sometimes locally important but not significant according to CEQA. The reason for this is that although the impacts would result in an adverse alteration of existing conditions, they would not substantially diminish, or result in the permanent loss of, an important resource on a population-wide or region-wide basis.

2.4.1 California Native Plant Society

The California Native Plant Society (CNPS) maintains a rank of plant species native to California that have low population numbers, limited distribution, or are otherwise threatened with extinction. This information is published in the *Inventory of Rare and Endangered Vascular Plants of California*. Potential impacts to populations of CNPS-ranked plants receive consideration under CEQA review. The following identifies the definitions of the CNPS Rare Plant Ranking System:

Rank 1A: Plants presumed Extinct in California and either rare or extinct elsewhere

Rank 1B: Plants Rare, Threatened, or Endangered in California and elsewhere

Rank 2A: Plants presumed extirpated in California but common elsewhere

Rank 2B: Plants Rare, Threatened, or Endangered in California, but more common elsewhere

Rank 3: Plants about which we need more information – A Review List

Rank 4: Plants of limited distribution – A Watch List

All plants appearing on CNPS Rank 1 or 2 are considered to meet CEQA Guidelines Section 15380 criteria. While only some of the plants ranked 3 and 4 meet the definitions of threatened or endangered species, the CNPS recommends that all Rank 3 and Rank 4 plants be evaluated for consideration under CEQA. Furthermore, the CNPS Rare Plant Rankings include levels of threat for each species. These threat ranks include the following:

0.1 - Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat);

0.2 - Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat); and

0.3 - Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known).

Threat ranks do not designate a change of environmental protections, so that each species (i.e., CRPR 1B.1, CRPR 1B.2, CRPR 1B.3, etc.), be fully considered during preparation of environmental documents under CEQA.

2.4.2 California Department of Fish and Wildlife Species of Concern

Additional fish, amphibian, reptile, bird, and mammal species may receive consideration by CDFW and lead agencies during the CEQA process, in addition to species that are formally listed under FESA and CESA or listed as fully protected. These species are included on the *Special Animals List*, which is maintained by CDFW. This list tracks species in California whose numbers, reproductive success, or habitat may be in decline. In addition to “Species of Special Concern” (SSC), the *Special Animals List* includes species that are tracked in the California Natural Diversity Database (CNDDB) but warrant no legal protection. These species are identified as “California Special Animals” (CSA).

2.5 SONOMA COUNTY POLICIES AND REGULATIONS

2.5.1 Sonoma County General Plan

In addition to federal and State regulations described above, the *Sonoma County General Plan* (General Plan) includes goals, objectives, and policies regarding biological resources within the County limits (Sonoma County 2020). Applicable sections of the General Plan for this BRA are summarized and included in Appendix A.

3.0 METHODS

Available information pertaining to the natural resources of the region was reviewed prior to conducting the field survey. The following site-specific published information was reviewed for this BRA:

- California Department of Fish and Wildlife (CDFW). 2020. *California Natural Diversity Database* (CNDDB); For: *Cotati, Sebastopol, Santa Rosa, Kenwood, Two Rock, Glen Ellen, Point Reyes NE, Petaluma,* and *Petaluma River* USGS 7.5-minute series quadrangles, Sacramento, CA. Accessed [February 19, 2020];

- California Native Plant Society (CNPS). 2020. *Inventory of Rare and Endangered Plants* (online edition, v8-03 0.45) For: *Cotati, Sebastopol, Santa Rosa, Kenwood, Two Rock, Glen Ellen, Point Reyes NE, Petaluma,* and *Petaluma River* USGS quadrangles. Accessed [February 19, 2020];

- U.S. Department of Agriculture (USDA), Natural Resource Conservation Service (NRCS). 1993. *Sonoma County, California*. USDA, NRCS, in cooperation with the Regents of the University of California (Agricultural Experiment Station);

- USDA, NRCS. 2020. *Web Soil Survey*. Available online at: http://websoilsurvey.sc.egov.usda.gov. Accessed [February 19, 2020];

- U.S. Fish and Wildlife Service (USFWS). 2020. *Information for Planning and Consultation* (IPaC) *Santa Rosa, Sonoma County, California.* Accessed [February 19, 2020]; and

- USGS. 2012. *Cotati, California*. 7.5-minute series topographic quadrangle. United States Department of Interior.

Prior to conducting the biological field survey, existing information concerning known habitats and special-status species that may occur in the Study Area was reviewed. The results of the records search and a five-mile radius CNDDB query for the Study Area are summarized in Tables 1-3 of Appendix B. The biological field survey was conducted on February 25, 2020, by HELIX biologists Christine Heckler and Halie Goeman. The weather during the field survey was sunny and clear with an average temperature of 70°F. The Study Area was systematically surveyed on foot to ensure total search coverage, with special attention given to portions of the Study Area with the potential to support special-status species and sensitive habitats. HELIX biologists used binoculars to further extend site coverage and identify species observed. All plant and animal species observed were recorded (Appendix C), and all biological communities occurring onsite were characterized. All resources of interest were mapped with Global

Positioning System (GPS)-capable tablets equipped with GPS receivers running ESRI Collector for ArcGIS version 10.6.1 software and a sub-meter Trimble R-1.

Following the field survey, the potential for each species identified in the records search to occur within the Study Area was determined based on the site survey, soils, habitats present within the Study Area, and species-specific information, as shown in Appendix B.

4.0 RESULTS

4.1 SITE LOCATION AND DESCRIPTION

The ±0.68-acre Study Area is located between the cities of Santa Rosa and Rohnert Park in Sonoma County, California. The Study Area is located within the Rancho Cotate Land Grant of the U.S. Geological Survey (USGS) 7.5-minute series *Cotati* quadrangle. The approximate location of the site is -122.712983 West and 38.371887 North (Figure 1). The Study Area is located in a semi-developed setting, immediately east of Santa Rosa Avenue and approximately 200 feet east of U.S. Highway 101 (Figure 2). The Study Area includes the proposed Project footprint and a surrounding 50-foot buffer. The Study Area is comprised of ruderal/disturbed habitat (approximately 0.57 acre), developed areas (approximately 0.10 acre), and a portion of a drainage canal (approximately 0.01 acre). Several homeless encampments were present within the Study Area at the time of the field survey, as well as associated trash and disturbance. Surrounding land uses include commercial developments, residential housing, and undeveloped wetland habitat.

4.2 PHYSICAL FEATURES

4.2.1 Topography and Drainage

The Study Area is located approximately 98 feet above mean sea level (MSL) and the topography is flat with only minor fluctuations in the overall landscape.

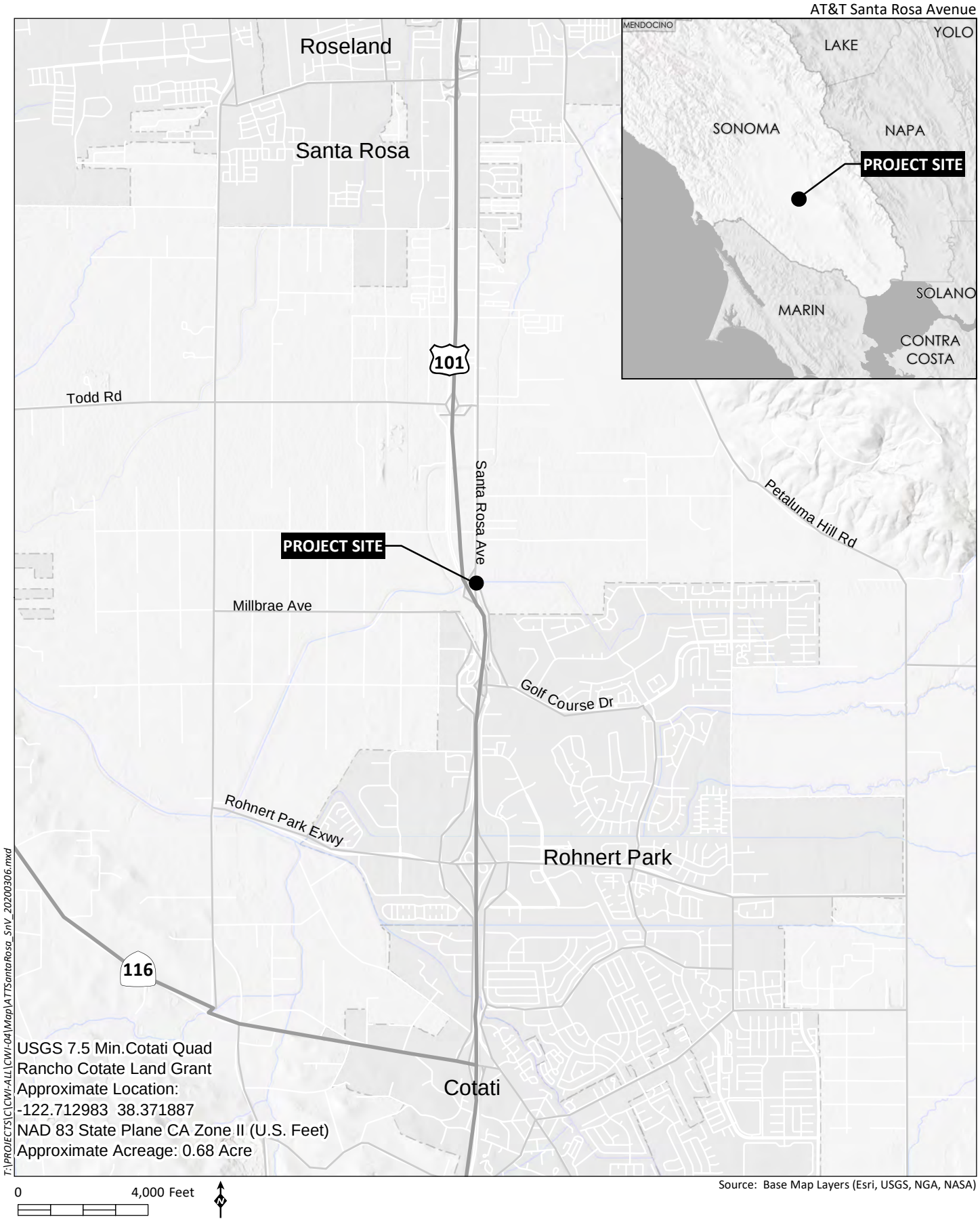
The Study Area is located in the Mark West Creek Watershed, USGS Hydrologic Unit Code HUC10-1801011007. A drainage canal is located north of the Project footprint and a portion of the canal is located within the Study Area. This canal flows west offsite and joins with Laguna de Santa Rosa, a large wetland complex with many tributaries. A large, undeveloped wetland complex is located south of the Study Area and contains numerous vernal pools and seasonal wetland features. No apparent direction of flow was observed within the Study Area but drainage from the Study Area likely flows over uplands as sheet-flow into this wetland complex, the drainage canal, and/or onto Santa Rosa Avenue and into a stormwater drainage system.

4.2.2 Soils

The Natural Resources Conservation Service has mapped one soil unit within the Study Area: Clear Lake clay, sandy substratum, drained, 0 to 2 percent slopes, MLRA 14 (Figure 3). The general characteristics and properties associated with this soil type are described below (USDA 2020, NRCS 1993 and 2020).

Clear Lake Clay, Sandy Substratum, Drained, 0 to 2 Percent Slopes, MLRA 14: This soil unit is derived from basin alluvium and is typical of basin floors, flood basins, and flood plains. It is poorly drained, has a

AT&T Santa Rosa Avenue



Source: Base Map Layers (Esri, USGS, NGA, NASA)

HELIX Environmental Planning

Vicinity Map

Figure 1

T:\PROJECTS\C\CWI-ALL\CWI-04\Map\ATTSantaRosa_ProjectSite_20200306.mxd 3/11/2020

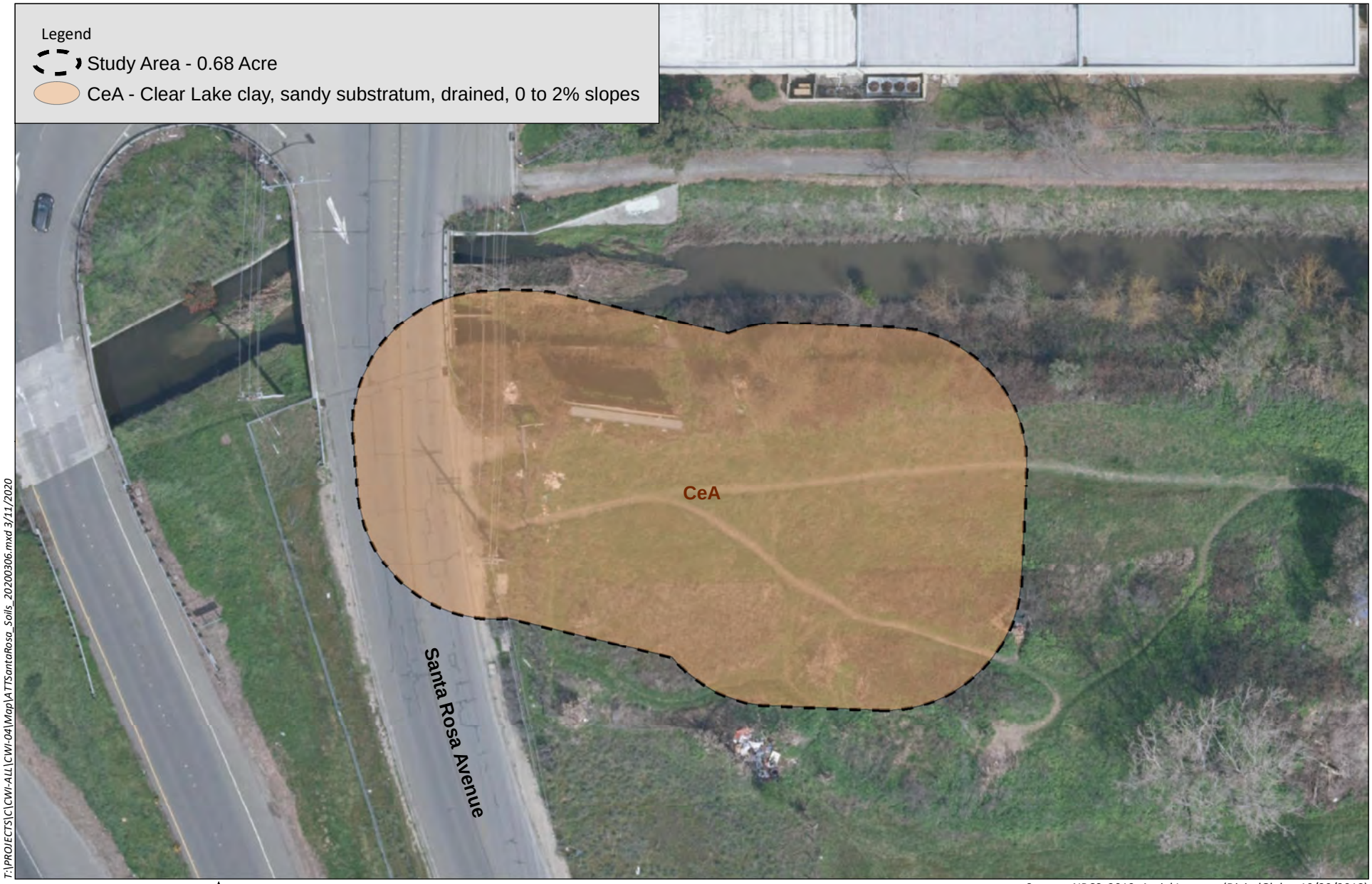
0 50 Feet

Source: Aerial Imagery (DigitalGlobe, 10/30/2018)

HELIX Environmental Planning

Project Site

Figure 2



T:\PROJECTS\C\CWI-ALL\CWI-04\Map\ATTSantaRosa_Soils_20200306.mxd 3/11/2020

0 50 Feet

Source: NRCS, 2019; Aerial Imagery (DigitalGlobe, 10/30/2018)

HELIX Environmental Planning

Soils

Figure 3

high runoff class, no frequency of flooding, and frequent ponding. There is a hydric soil rating for this soil unit. This soil unit is considered prime farmland and native vegetation that typically occurs consists of grasses and forbs.

4.3 BIOLOGICAL COMMUNITIES

Two upland biological communities and one aquatic resource type occur within the Study Area: ruderal/disturbed, developed, and a portion of a drainage canal. These habitat types are discussed below. A comprehensive list of all plant and wildlife species observed within the Study Area in these habitats is provided in Appendix C. Representative site photographs are included in Appendix D.

4.3.1 Ruderal/Disturbed

Ruderal/disturbed habitat is characterized by an assemblage of plant species that are often the first to colonize disturbed landscapes. Abandoned agricultural fields, construction sites, vacant lots, and road shoulders are just a few of the settings that can create favorable conditions for ruderal plant species. Ruderal habitat is typically associated with invasive and noxious weeds, and often features areas of bare ground.

The Study Area is dominated by ruderal plant species and areas of bare ground occur throughout due to consistent pedestrian traffic. Dominant plant species observed within the Study Area during the field survey on February 25, 2020 include: Himalayan blackberry (*Rubus armeniacus*), giant reed (*Arundo donax*), sweet fennel (*Foeniculum vulgare*), and Bermuda grass (*Cynodon dactylon*). Approximately 0.57 acre of ruderal/disturbed habitat occurs within the Study Area (Figure 4).

4.3.2 Developed

Developed habitat is often comprised of little to no vegetation and typically contains built structures and/or maintained surfaces such as roads or parking lots. Vegetation that does occur within this community type is often ornamental, rather than invasive or noxious weeds such as in ruderal habitat types. Approximately 0.10 acre of developed habitat occurs within the Study Area and is made up of Santa Rosa Avenue and an existing paved driveway (Figure 4).

Very few plants were observed within the developed habitat within the Study Area; plant species that were observed include prickly lettuce (*Lactuca serriola*) and yellow star-thistle (*Centaurea solstitialis*).

4.4 AQUATIC RESOURCES

4.4.1 Drainage Canal

Drainage canals are constructed aquatic features that can exhibit riverine and/or wetland characteristics. Drainage canals are often important components of upland/urban development and typically convey stormwater and other flows through a network of canals that usually connect to retention ponds or wetlands. Canals are often lined with concrete or other impermeable materials. The drainage canal within the Study Area is lined with concrete and contains emergent vegetation typical of wetlands in some areas of the channel. The drainage canal flows west offsite and joins with Laguna de Santa Rosa, a large wetland complex with many tributaries. The drainage canal within the Study Area is a blue line feature on USGS maps and also classified as freshwater emergent wetland (PEM1Cx) by the

National Wetlands Inventory (USFWS 2020a). The drainage canal appears to be connected to Five Creek, an intermittent stream, on USGS maps (USGS 2020). The drainage canal is outside of the proposed Project footprint and approximately 0.01 acre occurs within the Study Area (Figure 4). A near vertical concrete wall separates the channel of the drainage canal from the Project footprint area.

Plant species observed in the drainage canal within the Study Area include: brown headed rush (*Juncus phaeocephalus*), rough cocklebur (*Xanthium strumarium*), Fuller's teasel (*Dipsacus fullonum*), willow (*Salix* ssp.), and Himalayan blackberry.

4.5 SPECIAL-STATUS SPECIES

Special-status species are plant and wildlife species that have been afforded special recognition by federal, State, or local resource agencies or organizations. They are generally of relatively limited distribution and may require specialized habitat conditions. Special-status species are defined as meeting one or more of the following criteria:

- Listed or proposed for listing under CESA or FESA;
- Protected under other regulations (e.g., Migratory Bird Treaty Act);
- Included on the CDFW Special Animals List;
- Identified as Rare Plant Rank 1 to 4 by CNPS; or
- Receive consideration during environmental review under CEQA.

Special-status species considered for this analysis are based on queries of the CNDDB, the USFWS, and CNPS ranked species (online versions) for the *Cotati* USGS quadrangle and eight surrounding quadrangles. Appendix B includes the common name and scientific name for each species, regulatory status (federal, State, local, CNPS), habitat descriptions, and potential for occurrence within the Study Area. The following set of criteria has been used to determine each species' potential for occurrence within the Study Area:

- **Present**: Species known to occur within the Study Area based on CNDDB records and/or observed within the Study Area during the biological survey.

- **High**: Species known to occur onsite or in the vicinity of the Study Area (based on CNDDB records within five miles and/or based on professional expertise specific to the Study Area or species) and there is suitable habitat within the Study Area.

- **Low**: Species known to occur in the vicinity of the Study Area and there is marginal habitat within the Study Area **-OR-** Species is not known to occur in the vicinity of the Study Area, however, there is suitable habitat on the Study Area.

- **None**: Species is not known to occur on or in the vicinity of the Study Area and there is no suitable habitat within the Study Area -**OR-** Species was surveyed for during the appropriate season with negative results **-OR-** The Study Area occurs outside of the known elevation or geographic ranges.

T:\PROJECTS\C\CWI-ALL\CWI-04\Map\ATTSantaRosa_BioComms_20200306.mxd 3/11/2020

Source: Aerial Imagery (DigitalGlobe, 10/30/2018)

HELIX Environmental Planning

Biological Communities

Figure 4

Only those species that are known to be *present* or have a *high* or *low* potential for occurrence are discussed further in the following sections.

4.5.1 Listed and Special-Status Plants

According to the records search, 60 listed and/or special-status plants have the potential to occur onsite or in the vicinity of the Study Area (CDFW 2020). Based on field observations, published information, and literature review, one special-status plant species has a low potential to occur within the Study Area: Sonoma alopecurus (*Alopecurus aequalis* var. *sonomensis*). This species is discussed in detail below. The Study Area does not contain suitable vernal pool, marsh, or swamp habitat that special-status plants with potential to occur in the Study Area require. The drainage canal contains some freshwater wetland characteristics such as shallow, slow-moving water and emergent vegetation, but does not contain marsh or swamp characteristics such as still water, dominant woody vegetation, or suitable soil or hydrologic regimes to support the special-status plants in question.

Special-Status Plants with a Low Potential for Occurrence

Sonoma Alopecurus

Sonoma alopecurus is a federally endangered species and is rated as 1B.1 by CNPS; see Section 2.4.1 for CNPS rating definitions (CNPS 2020). This species occurs in riparian scrub and freshwater wetlands and swamps; and is most identifiable between May and July when in bloom. It is known to occur in Sonoma and Marin counties (CNPS 2020). The drainage canal within the Study Area contains wetland characteristics such as freshwater emergent vegetation and shallow, slow-moving water, and may provide marginally suitable habitat for this species. The closest documented occurrence is approximately 2.94 miles from the Study Area (CDFW 2020). Although the drainage canal may provide suitable habitat for this species, because the canal is not a natural wetland feature and lacks other suitable habitat components such as swamp and riparian scrub, Sonoma alopecurus has a low potential to occur. The canal is not within the proposed Project footprint and is not expected to be impacted by the proposed Project.

4.5.2 Listed and Special-Status Wildlife

According to the records search, 51 listed and/or special-status wildlife species have the potential to occur onsite or in the vicinity of the Study Area (CDFW 2020). Based on field observations, published information, and literature review, four special-status wildlife species have a low potential to occur within the Study Area. These include: California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), white-tailed kite (*Elanus leucurus*), and western pond turtle (*Emys marmorata*). These species are discussed in more detail below. In addition to these special-status wildlife species, other birds and raptors protected under federal, State and local laws/policies also have potential to occur within the Study Area.

Special-Status Wildlife with a High Potential for Occurrence

California Tiger Salamander

The California tiger salamander is listed as a federal and state threatened species. This species requires aquatic breeding habitat such as vernal pools, temporary ponds, stock ponds and wetlands, and also adjacent upland refugia habitat. Adults aestivate in small mammal burrows throughout summer and

emerge after heavy rainfall to breed (typically November to March). This species typically travels over uplands during night to reach breeding pools (Nafis 2020). Upland habitat typically consists of grasslands and oak savannah, and ground squirrel (*Otospermophilus beecheyi*) burrows are most frequently used for refugia. This species is endemic to California and is only known to occur within the Central Valley, and Sonoma and Santa Barbara counties.

The Study Area does not contain suitable aquatic habitat for this species and no suitable burrows were observed during the field survey on February 25, 2020. However, potential suitable habitat occurs directly south of the Study Area in a large wetland complex and this species may travel through the Study Area, especially during breeding events. This species may also utilize the Study Area as upland habitat if suitable burrows are present. Although the Study Area does not contain suitable aquatic habitat and no suitable burrows were observed during the field survey, this species has a high potential to occur in the Study Area because the Study Area is within designated critical habitat for this species and there are 70 documented occurrences within five miles of the Study Area; in addition, the closest documented occurrence is approximately 125 feet from the Study Area (CDFW 2020).

Special-Status Wildlife with a Low Potential for Occurrence

California Red-Legged Frog

The California red-legged frog is listed as a federally threatened species and is also considered a Species of Special Concern by CDFW. This species requires both upland and aquatic habitat components and typically occurs in humid forests, woodlands, grasslands, and other cool, moist areas. Aquatic habitat typically includes slow-moving streams, ponds, or marsh communities with emergent vegetation. Upland habitats near aquatic habitat require downed woody debris, leaf litter, or other moist, cool refugia locations to prevent desiccation. Breeding takes place in small, still pools and typically occurs from November to April (Nafis 2020). This species is almost always found near water but can disperse up to two miles to reach breeding pools during the breeding season (USFWS 2011).

The drainage canal within the Study Area may provide suitable aquatic habitat for this species (Figure 4). Emergent freshwater vegetation and slow-moving water suitable for this species were observed within the canal during the field survey on February 25, 2020, and this species has been observed within drainage canals within urban environments (De Palma-Dow et al. 2017). The closest documented occurrence is approximately 2.05 miles from the Study Area (CDFW 2020). Although suitable aquatic habitat is present in the Study Area, suitable upland habitat does not occur in the Study Area and a near vertical concrete wall separates the channel of the drainage canal from the Project footprint area. If California red-legged frog were to occur, it would likely be restricted to the channel and the potential of dispersal into the Project footprint area is very low.

White-Tailed Kite

The white-tailed kite is listed as a Fully Protected species by CDFW. This species is a year-round resident in coastal and valley lowlands in California and often occurs in savannah, open oak woodlands, marsh, grassland, and agricultural habitats. White-tailed kites breed from February to October, peaking from May to August (Zeiner et al. 1990). This species nests near the top of dense oaks, willows, or other large trees, especially near aquatic habitats. Trees growing in isolation or on the edge of a woodland or forest are most commonly used for nesting. White-tailed kites forage over open habitats such as un-grazed or lightly-grazed fields, agricultural areas, and open grasslands.

The ruderal/disturbed habitat within the Study Area may provide suitable foraging habitat for this species (Figure 4). No suitable nest trees are present within the Study Area but suitable nest trees occur adjacent to the Study Area. A red-shouldered hawk (*Buteo lineatus*) was observed sitting in an adjacent tree and scanning the Study Area for prey during the field survey on February 25, 2020, indicating that suitable raptor prey is likely present within the Study Area. The closest documented occurrence is approximately 2.85 miles from the Study Area (CDFW 2020). Because the Study Area contains a relatively small area of suitable foraging habitat and no nest trees occur within the Study Area, white-tailed kite has a low potential to occur.

Western Pond Turtle

The western pond turtle is designated as a Species of Special Concern by CDFW. This species occurs in a variety of aquatic habitats such as ponds, creeks, ditches, lakes, and marshes. Areas with abundant vegetation and rocky or muddy substrate are preferred; and exposed banks or other basking areas, such as logs or cattail mats, are required. They are generally associated with permanent or nearly permanent water sources and prefer areas of deep water with low velocity and high temperatures (Reese and Hartwell 1997). Upland habitats adjacent to aquatic habitat are used throughout the year for nesting and overwintering. Although studies have shown that the typical terrestrial use area can extend up to 500 meters from the edge of the aquatic habitat, the weighted average of recorded terrestrial use is 94 meters, or approximately 300 feet from suitable aquatic habitat (Rathbun et al. 2002). Western pond turtles prefer to overwinter in areas with moderate woody vegetation and leaf litter and are unlikely to use annual grasslands (Reese and Hartwell 1997 and Pilliod et al. 2013). Little is known about dispersal patterns of western pond turtles, but genetic analysis shows most movement is often along drainages (Riensche et al. 2013).

The drainage canal within the Study Area may provide suitable aquatic habitat for this species (Figure 4). Emergent freshwater vegetation and suitable basking areas were present within the canal, and slow-moving water suitable for this species was observed during the field survey on February 25, 2020. The closest documented occurrence is approximately 0.32 mile from the Study Area (CDFW 2020). Although suitable aquatic habitat is present in the Study Area, suitable upland habitat does not occur in the Study Area and a near vertical concrete wall separates the channel of the drainage canal from the Project footprint area. If western pond turtle were to occur, it would likely be restricted to the channel and the potential of dispersal into the Project footprint area is very low.

Nesting Migratory Birds and Raptors

Migratory birds are protected under the MBTA of 1918 (16 U.S.C. 703-711). The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10; this also includes feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Additionally, Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., hawks, owls, eagles, and falcons), including their nests or eggs; and Section 3513 specifically states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

A number of birds and raptors have the potential to nest in or adjacent to the Study Area. Suitable nest locations include trees, shrubs, and bare ground.

4.6 SENSITIVE HABITATS

Sensitive habitats include those that are of special concern to resource agencies or those that are protected under CEQA; Section 1600 of the California Fish and Game Code, which includes riparian areas; and/or Sections 401 and 404 of the Clean Water Act, which include wetlands and other waters of the U.S. Additionally, sensitive habitats are protected under the specific policies outlined in the *Sonoma County General Plan*. Sensitive habitats or resources types within the Study Area are discussed below.

4.6.1 California Tiger Salamander Critical Habitat

The Study Area is within designated critical habitat for California tiger salamander. This species has potential to occur in the Study Area in passing, especially during the breeding season, and may also utilize the Study Area as upland habitat if suitable burrows are present.

4.6.2 Aquatic Resources

The drainage canal within the Study Area contains emergent freshwater vegetation and suitable habitat for special-status species and is considered a sensitive habitat. The drainage canal is also a blue line feature on USGS maps and is likely a jurisdictional feature.

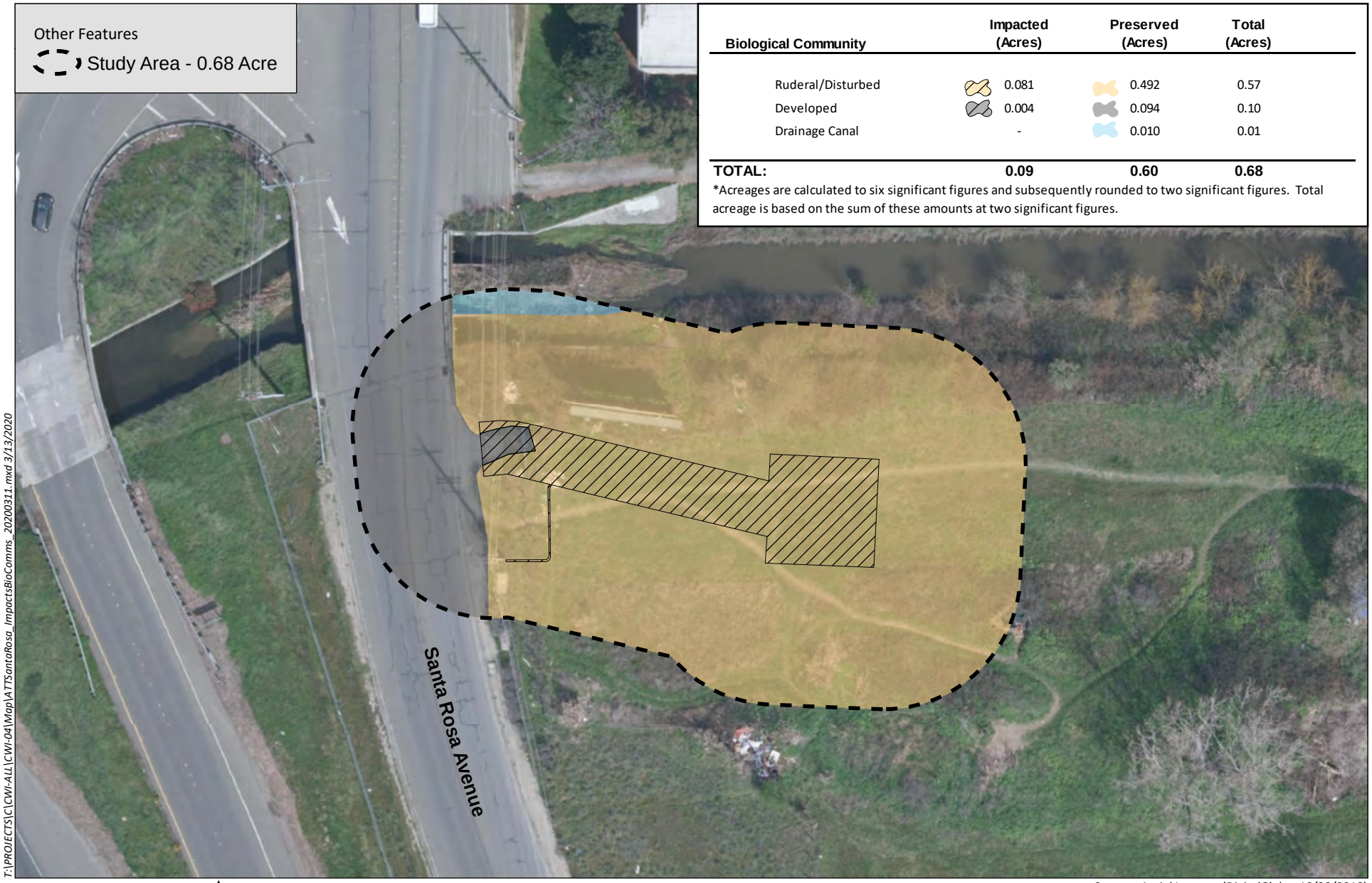
4.6.3 Wildlife Migration Corridors

Wildlife corridors link areas of suitable wildlife habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbance. This fragmentation of habitat can also occur when a portion of one or more habitats is converted into another habitat; for instance, when woodland or scrub habitat is altered or converted into grasslands after a disturbance such as fire, mudslide, or construction activities. Wildlife corridors mitigate the effects of this fragmentation by: (1) allowing animals to move between remaining habitats thereby permitting depleted populations to be replenished and promoting genetic exchange; (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk of catastrophic events (such as fire or disease) on population or local species extinction; and (3) serving as travel routes for individual animals as they move within their home ranges in search of food, water, mates, and other needs.

Although some wildlife species may utilize portions of the Study Area for foraging, breeding, or other functions, the Study Area itself does not link two significant natural areas and is not considered a wildlife migration corridor. However, some aquatic species, such as western pond turtle, may utilize the drainage canal as a movement corridor to/from other suitable habitats.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The Study Area contains ±0.57 acre of ruderal/disturbed habitat, ±0.10 acre of developed habitat, and ±0.01 acre of drainage canal. Table 1 summarizes the biological communities and expected impacts to these communities that would result from the proposed development plan. Proposed Project impacts are also illustrated in Figure 5.



Biological Community	Impacted (Acres)	Preserved (Acres)	Total (Acres)
Ruderal/Disturbed	0.081	0.492	0.57
Developed	0.004	0.094	0.10
Drainage Canal	-	0.010	0.01
TOTAL:	**0.09**	**0.60**	**0.68**

*Acreages are calculated to six significant figures and subsequently rounded to two significant figures. Total acreage is based on the sum of these amounts at two significant figures.

T:\PROJECTS\C\CWI-ALL\CWI-04\Map\ATTSantaRosa_ImpactsBioComms_20200311.mxd 3/13/2020

0 50 Feet

Source: Aerial Imagery (DigitalGlobe, 10/30/2018)

HELIX Environmental Planning

Impacts to Biological Communities

Figure 5

Table 1
IMPACTS TO BIOLOGICAL COMMUNITIES

Ruderal/Disturbed	0.081	0.492	0.57
Developed	0.004	0.094	0.10
Drainage Canal	0.000	0.010	0.01
TOTAL	**0.09**	**0.60**	**0.68**

* Total acreage is rounded to two decimal places.

No special-status plants or special-status wildlife species were observed within the Study Area during the field survey on February 25, 2020. However, suitable habitat is present for one special-status plant and several wildlife species and there is the potential these species may occur within the Study Area. Recommendations, including avoidance and minimization measures to limit or avoid impacts to special-status species that may occur are included in Section 5.1.

Known or potential biological constraints in the Study Area include the following:

- Potential habitat for special-status plants including Sonoma alopecurus;
- Potential aquatic habitat for California red-legged frog;
- Potential aquatic habitat for western pond turtle;
- Potential upland habitat for California tiger salamander and within designated critical habitat;
- Potential nesting and/or foraging habitat for migratory birds, other birds and raptors, and special-status birds including white-tailed kite; and
- Potential impacts to aquatic resources.

5.1 RECOMMENDATIONS

5.1.1 Special-Status Plants

Special-status plants with potential to occur within the Study Area include Sonoma alopecurus. This species has a low potential to occur within the drainage canal in the Study Area. This species was not observed during the February 25, 2020 field survey; however, the timing of the survey was not within the typical identification (blooming) period for this species. No impacts are expected to occur to the drainage canal and the Project footprint is outside of this feature (Figure 5). However, if potential impacts are expected to occur within the drainage canal, the following special-status plant measures are recommended:

A qualified botanist should conduct special-status plant surveys within the appropriate identification period prior to the initiation of any ground disturbing activities within the canal. One survey conducted between May and July will satisfy the blooming period for this plant species. If no special-status plants are observed within the Study Area, then a letter report documenting the survey results should be prepared and submitted to the project proponent and no further measures are recommended.

If special-status plants are observed within the Study Area, the location of the special-status plants should be marked with pin flags or other highly visible markers and may also be marked by GPS. The Project proponent should determine if the special-status plant(s) onsite can be avoided by Project design or utilize construction techniques to avoid impacts to the special-status plant species. All special-status plants to be avoided within the Study Area should have exclusion fencing or other highly visible material marking the avoidance area and the avoidance area should remain in place throughout the entire construction period.

Prior to commencement of work activities, a designated botanist/biologist should provide a worker environmental awareness training to all Project-related personnel. The training should include information on identifying special-status plant species, their ecology and habitat requirements, the Project boundaries, and the avoidance and minimization measures to be followed to avoid documented populations of special-status plant species within the project footprint. Upon completion of the training, all construction personnel should sign a form stating that they have attended the training and understand all the measures. Proof of this instruction should be kept on file with the Project proponent.

If special-status plants are found within the Study Area and cannot be avoided, the Project proponent should consult with the CDFW and/or the USFWS as appropriate, and depending on the status of the plant species in question, determine appropriate measures to mitigate for the loss of special-status plant populations within the Study Area. These measures may include gathering seed from impacted populations for planting within nearby appropriate habitat, preserving or enhancing existing offsite populations of the plant species affected by the Project, or restoring suitable habitat for special-status plant species habitat as directed by the regulatory agencies.

5.1.2 California Tiger Salamander

The Study Area is within designated critical habitat for California tiger salamander and this species is known to occur in the vicinity of the Study Area. Suitable aquatic habitat for this species does not occur within the Study Area and no suitable burrows were observed during the field survey on February 25, 2020. However, this species may utilize the Project area if suitable burrows are present and may occur within the Project area during breeding periods (November to March). To avoid potential impacts to California tiger salamander, the following measures are recommended:

Wildlife exclusion fencing should be installed around the entire Project area prior to construction. General silt fencing or other solid fencing is recommended. Fencing should be trenched into the soil at least four (4) inches and the soils must be carefully compacted against both sides of the fence for its entire length to prevent animals, such as California tiger salamanders, from entering the Project area. Natural fiber straw wattles may also be used at the base of the fencing to reduce small gaps or holes. The fencing should be inspected daily the duration of the Project to ensure functionality and any holes, tears, or gaps should be repaired immediately. Fencing should be removed upon Project completion.

Although no burrows were observed in the Study Area during the field survey on February 25, 2020, burrows may occur in the future and a pre-construction survey should be conducted within the Study Area to determine the presence of suitable burrows and California tiger salamanders. The pre-construction survey should be conducted by a qualified biologist within 24-hours of the start of construction. If no California tiger salamanders or suitable burrows are observed, then a letter report should be prepared to document the survey and be provided to the project proponent and no additional

measures are recommended. If development does not commence within 14 days of the survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work.

If suitable burrows are observed, the burrows shall be marked with a pin flag and may also be marked by using a GPS unit with sub-meter accuracy. All burrows marked shall be avoided to the greatest extent possible and shall remain marked throughout the entire construction period of the area. CDFW typically requires an avoidance buffer of 50 feet for suitable burrows. Contractors should be made aware of burrow locations to avoid during construction and burrow locations shall be marked on all project plans.

If potentially suitable burrows are located within the construction zone that cannot be avoided by construction, excavation of burrows shall be conducted as follows:

1. All excavations shall be conducted between April 1 and September 30 (during the non-breeding season for California tiger salamander). Excavation will be done with hand tools by a qualified biologist that has been approved by both USFWS and CDFW for the project to handle California tiger salamanders and monitored by a qualified biologist determine if California tiger salamanders are present within the burrows.

2. Burrow excavation should occur by slowly removing the burrow (including any side tunnels) using hand tools (e.g., shovel, digging bar, garden trowel, masonry trowel, etc.). If hand tools cannot be used safely due to soil compaction and/or extreme burrow depth, burrows may be excavated using mechanical methods. Mechanical methods will include either hand power tools or a backhoe and/or hand tools (e.g., shovel, garden trowel, masonry trowel, etc.).

3. All burrows (including side burrows) will be excavated to the endpoints and the excavation will then be backfilled.

If California tiger salamanders are observed within the Project area during the pre-construction survey, no work shall occur until CDFW and/or USFWS has been consulted to determine appropriate mitigation and avoidance measures.

If California tiger salamanders are observed within the Project area during work, specifically within the construction zone, all work shall immediately halt in the vicinity of the animal and the animal will be allowed to leave the area on its own will. If the animal is in immediate danger, a USFWS or CDFW-approved biologist will relocate the animal outside of the construction zone, at a safe distance from all construction related activities, and within suitable habitat. No one other than an approved biologist shall handle, take, or otherwise harass the animal. No work shall resume until the animal has moved or been removed from areas of potential disturbance.

A qualified biologist should conduct an environmental awareness training to all Project-related personnel prior to the initiation of work. The training should include identification of California tiger salamander, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the Project, penalties for non-compliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel should sign a form stating that they have attended the training and understand all the measures. Proof of this instruction should be kept on file with the Project proponent.

5.1.3 California Red-Legged Frog and Western Pond Turtle

The California red-legged frog is listed as a federally threatened species and is considered a Species of Special Concern by CDFW; western pond turtle is also considered a Species of Special Concern by CDFW. These species have a low potential to occur in the drainage canal within the Study Area. No direct impacts are expected to occur within the drainage canal and a near vertical concrete wall separates the canal from the Project footprint area. As such, the likelihood of these species occurring within the Project footprint is very low but measures are recommended to avoid any potential impacts to these species. These include:

If possible, conduct all construction activities outside of the breeding season for California red-legged frogs (generally November to April) to avoid potential impacts to dispersing individuals.

A qualified biologist should conduct a pre-construction survey for California red-legged frogs and western pond turtle within 24-hours of the start of construction. If the survey shows that there is no evidence of California red-legged frog or western pond turtle, then a letter report should be prepared to document the survey and be provided to the project proponent and no additional measures are recommended. If development does not commence within 14 days of the survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work.

If California red-legged frog is observed during the survey, no work shall occur until CDFW and/or USFWS has been consulted to determine appropriate mitigation and avoidance measures. If western pond turtle is observed during the survey, it is recommended that a qualified biologist monitor the initiation of construction to ensure no western pond turtles are present in the construction zone and appropriate avoidance measures can be taken during construction initiation.

Wildlife exclusion fencing should be installed around the entire Project area prior to construction (see Section 5.1.2 for fencing details).

A biologist should conduct an environmental awareness training to all Project-related personnel prior to the initiation of work. This training should follow the same guidelines as for California tiger salamander and may be combined as appropriate.

If California red-legged frogs are observed within the Project area, specifically within the construction zone, all work shall immediately halt in the vicinity of the animal and the animal will be allowed to leave the area on its own will. If the animal is in immediate danger, a USFWS or CDFW-approved biologist will relocate the animal outside of the construction zone, at a safe distance from all construction related activities, and within suitable habitat. No one other than an approved biologist shall handle, take, or otherwise harass the animal. No work shall resume until the animal has moved or been removed from areas of potential disturbance. If a western pond turtle is observed in the Project area, the same guidelines should be followed but a USFWS or CDFW-approved biologist is not needed to relocate the animal.

5.1.4 Special-Status Birds and Other Birds and Raptors

Special-status birds and other birds and raptors protected under federal, State, and/or local laws and policies have potential to occur and nest within the Study Area. Although no active nests were observed during the field survey on February 25, 2020, the Study Area contains suitable habitat to support nesting birds within various trees and shrubs, and on bare ground. In addition, white-tailed kite may forage

within the Study Area and suitable nest trees for this species occur immediately adjacent to the Study Area.

Active nests and nesting birds are protected by the California Fish and Game Code Sections 3503 and 3503.5, 3513 and the MBTA. Ground-disturbing and other development activities including grading, vegetation clearing, tree removal/trim, and construction could impact nesting birds if these activities occur during the nesting season (generally February 1 to August 31). To avoid impacts to nesting birds, all ground disturbing activity should be completed between September 1 and January 31, if feasible.

If construction activities occur during the nesting season, a qualified biologist should conduct a nesting bird survey to determine the presence of any active nests within the Study Area. Additionally, the surrounding 500 feet of the Study Area should be surveyed for active raptor nests, where accessible, and with binoculars as necessary. The nesting bird survey should be conducted within 14 days prior to commencement of ground-disturbing or other development activities. If the nesting bird survey shows that there is no evidence of active nests, then a letter report should be prepared to document the survey and be provided to the project proponent and no additional measures are recommended. If development does not commence within 14 days of the nesting bird survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work.

If active nests are found, then the qualified biologist should establish a species-specific buffer to prohibit development activities near the nest to and minimize nest disturbance until the young have successfully fledged or the biologist determines that the nest is no longer active. Buffer distances may range from 30 feet for some songbirds and up to 250 to 500 feet for most raptors. Nest monitoring may also be warranted during certain phases of construction to ensure nesting birds are not adversely impacted. If active nests are found within any trees slated for removal or pruning, then an appropriate buffer should be established around the tree and all trees within the buffer should not be removed until a qualified biologist determines that the nest has successfully fledged and/or is no longer active.

In addition, a qualified biologist should conduct an environmental awareness training to all Project-related personnel prior to the initiation of work. This training should follow the same guidelines as for California tiger salamander, California red-legged frog, and western pond turtle, and may be combined as appropriate.

If construction occurs outside of the nesting bird season (September 1 to January 31) a nesting bird survey and environmental training for nesting birds would not be required.

5.1.5 Aquatic Resources

No development is proposed to occur within the drainage canal under the proposed Project and direct impacts are not expected. However, if Project plans change and potential impacts to the drainage canal are expected, prior to initiation of any construction activities that could result in impacts to the drainage canal, the USACE and RWQCB should be consulted to determine if the drainage canal is subject to regulation under Section 404 and/or 401 of the CWA or the Porter-Cologne Act. CDFW should also be consulted if impacts to this feature are proposed as this drainage canal may be subject to CDFW jurisdiction and a Streambed Alteration Agreement may be required.

5.2 SUMMARY OF AVOIDANCE AND MINIMIZATION MEASURES

- If impacts to the canal will occur, a qualified botanist should conduct a special-status plant survey within the appropriate identification period for species with potential to occur within the Study Area. A survey conducted between May and July should satisfy the identification period. The survey should take place prior to the initiation of any ground disturbing activities.

- Wildlife exclusion fencing should be installed around the entire Project area prior to construction to limit the likelihood of wildlife including California red-legged frog, western pond turtle, and California tiger salamander, from entering the Project area.

- A qualified biologist should conduct pre-construction surveys for nesting birds (if construction is to occur during the nesting season). The survey should be conducted within 14 days prior to development or ground disturbing activities. If development does not commence within 14 days of the pre-construction surveys, or halts for more than 14 days, then additional surveys are required prior to resuming or starting work.

- A pre-construction survey should be conducted within 24-hours of the start of construction to determine if California red-legged frogs, western pond turtles, and California tiger salamanders are present within the Project area. The presence of suitable California tiger salamander burrows within the Project area should also be determined during the survey. If burrows are observed, they should be marked and avoided with a 50-foot minimum buffer. If the burrows cannot be avoided, they should be appropriately excavated by a qualified biologist.

- If California red-legged frog or California tiger salamander are observed during the pre-construction survey, no work shall occur until CDFW and/or USFWS has been consulted to determine appropriate mitigation and avoidance measures. If western pond turtle is observed during the pre-construction survey, it is recommended that a qualified biologist monitor the initiation of construction to ensure no western pond turtles are present in the construction zone and appropriate avoidance measures can be taken during construction initiation.

- A qualified biologist should conduct environmental awareness trainings to all Project-related personnel prior to the initiation of work. The trainings should cover all special-status plant and wildlife species with the potential to occur within the Study Area.

- It is currently expected that all aquatic resources within the Study Area will be avoided. If site plans change and impacts to aquatic resources will occur, obtain 404 and 401 permits for any impacts to waters of the U.S. and file a waste discharge report for impacts to waters of the State not subject to regulation under the Clean Water Act; Submit a 1600 Lake and Streambed Alteration Notification to CDFW for any impacts to aquatic features subject to CDFW jurisdiction, if needed.

6.0 REFERENCES

California Department of Fish and Wildlife (CDFW). 2020. California Natural Diversity Data Base (For: *Cotati, Sebastopol, Santa Rosa, Kenwood, Two Rock, Glen Ellen, Point Reyes NE, Petaluma, and Petaluma River* USGS 7.5-minute series quadrangles), Sacramento, CA. Accessed [February 19, 2020].

California Native Plant Society (CNPS). 2020. Inventory of Rare and Endangered Plants (online edition, v8-03 0.45) (For: *Cotati, Sebastopol, Santa Rosa, Kenwood, Two Rock, Glen Ellen, Point Reyes NE, Petaluma, and Petaluma River* USGS 7.5-minute series quadrangles). Accessed [February 19, 2020].

De Palma-Dow, Angela, Joseph Curti, and Debra Sharpton. 2017. *Managing Invasive Crayfish to Restore Stream Habitat in the Malibu Creek Watershed, Los Angeles Co., USA*. Lecture at the 2017 California/Nevada Amphibian Populations Task Force Conference.

Nafis, Gary. 2020. California Herps - A Guide to the Amphibians and Reptiles of California. Available online at: http://www.californiaherps.com/index.html.

Pilliod, David S., Justin L. Welty, and Robert Stafford. 2013. *Terrestrial Movement Patterns of Western Pond Turtles (Actinemys marmorata) in Central California*. Pages 207-221 in *Herpetological Conservation and Biology*.

Rathbun, G. B., N. J. Scott, T. G. Murphey. 2002. Terrestrial habitat use by Pacific pond turtles in a Mediterranean climate. *Southwestern Naturalist* 47(2):225–235.

Reese, D.A.; Welsh, Hartwell H., Jr. 1997. *Use of terrestrial habitat by western pond turtles (Clemmys marmorata): implications for management*. Pages 352-357 in Proceedings: Conservation, Restoration, and Management of Turtles and Tortoises. An International Conference. New York Turtle and Tortoise Society.

Riensche, David L., Douglas A. Bell, Amda L. Dwyer, Janelle A. Dorcy. 2013. *Movement Patterns and Habitat Use by the Western Pond Turtle (Actinemys marmorata) in the East Bay Regional Park District*. Poster presentation prepared for The Wildlife Society 2013 Annual Conference.

Sonoma County. 2020. *Sonoma County General Plan*. Available online at: https://sonomacounty.ca.gov/PRMD/Long-Range-Plans/General-Plan/

U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). 1993. Soil Survey of Sacramento County, California. USDA, NRCS, in cooperation with the Regents of the University of California (Agricultural Experiment Station).

2020. Web Soil Survey. Available online at: http://websoilsurvey.sc.egov.usda.gov/App/HomePage.html. Accessed [February 19, 2020].

U.S. Fish and Wildlife Service (USFWS). 2020. Information for Planning and Conservation (IPaC) Trust Resource Report: *Santa Rosa Ave, Sonoma County, California*. Accessed [February 19, 2020].

2020a. National Wetlands Inventory. *Wetlands Mapper*. Available online at: https://www.fws.gov/wetlands/data/Mapper.html.

2011. Arcata Fish and Wildlife Office. California Red-Legged Frog. Available online at: https://www.fws.gov/arcata/es/amphibians/crlf/crlf.html.

U.S. Geological Survey (USGS). 2012. *Cotati,* California. 7.5 -minute series topographic quadrangle. U.S. Department of the Interior.

2020. National Map. Available online at: https://viewer.nationalmap.gov/basic/

Zeiner, D.C., W.F. Laudenslayer, Jr., K.E. Mayer, and M. White, eds. 1990. California's Wildlife. Vol. I-III. California Depart. of Fish and Game, Sacramento, California.

Appendix A

Applicable Sections of the Sonoma County General Plan

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Appendix A
Applicable Sections of the Sonoma County General Plan

Sonoma County General Plan

1.3 Purpose of Plan

"Sonoma County General Plan 2020 (GP 2020) is a revision of the previous General Plan, which was adopted in 1989, and supersedes and replaces that document. This plan carries forward the major goals and policy framework of the 1989 Plan, and retains the overall format. The primary purpose of the revised plan was to conduct a policy review which focused upon specific issues that were of paramount importance to the community.

The broad purpose of GP 2020 is to express policies which will guide decisions on future growth, development, and conservation of resources through 2020 in a manner consistent with the goals and quality of life desired by the county's residents. Under State law many actions on private land development, such as Specific Plans, Area Plans, zonings, subdivisions, public agency projects and other decisions must be consistent with the General Plan. The Goals, Objectives, and Policies set forth in the plan will be applied in a manner to insure their constitutionality."

Applicable sections of the Sonoma County General Plan to the BRA are outlined below.

Open Space and Resource Conservation Element

1.1 Purpose

State law recognizes that open space land is a limited and valuable resource which must be conserved wherever possible. The element addresses open space for the preservation of natural resources, for the managed production of resources, for outdoor recreation, for public health and safety, and for Archeological, Historical, and Cultural resources.

The purpose of the Open Space and Resource Conservation Element is to preserve the natural and scenic resources which contribute to the general welfare and quality of life for the residents of the county and to the maintenance of its tourism industry. This element provides the guidelines for making necessary consistency findings and includes an implementation program, as required by law.

Open Space for Preservation of Natural Resources:

- The Land Use Element establishes the Countywide Land Use Policy Framework. This framework provides the underpinning for the preservation of natural resources by stressing city and community centered growth, compact city and community boundaries, use of environmental suitability for guiding rural growth, protection of agricultural lands, preservation of scenic and biotic resources, and sustainability.
- The Open Space and Resource Conservation Element includes policies addressing the preservation of scenic resources and biotic habitats and riparian corridors. It also addresses air quality and energy resources, mineral and timber resources, and soil resources.
- The Water Resources Element includes policies addressing preservation of both surface and groundwater resources, including water supply and water quality.

Appendix A (cont.)
Applicable Sections of the Sonoma County General Plan

Biotic Resources

Protection of Biotic Habitat Areas is necessary because they are sensitive to change and the adverse effects of human activities. Forests have been logged, natural areas converted to urban and agricultural uses, non-native species introduced, and barriers created as a result of development, roadway construction, installation of fencing, etc. These changes in the natural landscape have forced wildlife into smaller areas and marginal habitat and limited the dispersal and movement of native plants and animals.

This section addresses:

- Special-status species habitat
- Marshes and wetlands
- Sensitive Natural Communities
- Habitat connectivity corridors

GOAL OSRC-7: Protect and enhance the County's natural habitats and diverse plant and animal communities.

Objective OSRC-7.1: Identify and protect native vegetation and wildlife, particularly occurrences of special status species, wetlands, sensitive natural communities, woodlands, and areas of essential habitat connectivity.

Objective OSRC-7.2: Designate important Biotic Habitat Areas and update designations periodically using credible data sources. Objective

OSRC-7.3: Establish development guidelines to protect designated Biotic Habitat Areas and assure that the quality of these natural resources is maintained.

Objective OSRC-7.4: Where appropriate, support regulatory efforts by other agencies to protect biotic habitat.

Objective OSRC-7.5: Maintain connectivity between natural habitat areas.

Objective OSRC-7.6: Establish standards and programs to protect native trees and plant communities.

Objective OSRC-7.7: Support use of native plant species and removal of invasive exotic species.

Objective OSRC-7.8: Encourage voluntary efforts to restore and enhance biotic habitat.

Objective OSRC-7.9: Preserve and restore the Laguna de Santa Rosa, San Pablo Bay and Petaluma marshes and other major marshes and wetlands.

Objective OSRC-7.10: Promote production of native marine and shoreline plant and animal habitats along the Pacific Coast and San Pablo Bay shorelines.

The following policies shall be used to achieve these objectives:

Policy OSRC-7a: Designate as Biotic Habitat Areas in the Open Space and Resource Conservation Element the known locations shown on Figures OSRC-5a through OSRC 5i and identified as Special Status Species Habitat, Marshes and Wetlands, Sensitive Natural Communities, and Habitat Connectivity Corridors.

Policy OSRC-7b: Rezone to the Biotic Resources combining district all lands designated as Biotic Habitat Areas. Prepare and adopt an ordinance that provides for protection of designated Biotic Habitat Areas in conformance with the following principles. Until the ordinance is adopted, require that land use and development in designated areas comply with these principles:

(1) For discretionary projects, notify applicants of protected habitats and species and possible requirements of Federal and State regulatory agencies, request identification of known protected habitats and species, and:

(a) In designated Biotic Habitat Areas, require site assessment and adequate mitigation. The priorities for adequate mitigation are, in order of highest to lowest priority:

- Avoid the habitat.
- Mitigate on site to achieve no net loss.
- Create replacement habitat off site to achieve no net loss.

To the extent feasible, the mitigation required by the County should be consistent with permit requirements of Federal and State regulatory agencies.

(b) In designated Marshes and Wetlands, require a setback of 100 feet from the delineated edges of wetlands. The setback may be reduced based upon site assessment and appropriate mitigation.

(c) In designated Habitat Connectivity Corridors, encourage property owners to consult with CDFG, install wildlife friendly fencing, and provide for roadway undercrossings and oversized culverts and bridges to allow movement of terrestrial wildlife.

(d) The acreage required for adequate mitigation and replacement habitat shall be at least two times the acreage affected unless a lower level is acceptable to the applicable State and Federal agencies, with the amount depending on the habitat affected and the applicable mitigation priority value.

(2) For discretionary projects in all designated Biotic Habitat Areas, send referrals to appropriate regulatory agencies and, where such agencies' comments or other agency information indicates biotic resources could be adversely affected, require site assessment, compliance with agency requirements and adequate mitigation pursuant to the priorities in (1) (a).

Policy OSRC-7c: Notify discretionary and ministerial permit applicants of possible requirements of Federal and State regulatory agencies related to jurisdictional wetlands or special status species.

Policy OSRC-7d: In all areas outside Urban Service Areas, encourage property owners to utilize wildlife friendly fencing and to minimize the use of outdoor lighting that could disrupt native wildlife movement activity.

Policy OSRC-7e: In coordination with resource agencies, landowners and affected public, review Biotic Habitat Area designations and related policy issues periodically, but at least every five years. If warranted, develop recommendations for additional policies that may be needed to ensure appropriate protection of biotic resources. Include consideration of methods to identify and monitor cumulative habitat loss and establish thresholds to protect sensitive resources.

Policy OSRC-7f: Support acquisition of conservation easements or fee title by the Sonoma County Agricultural Preservation and Open Space District (SCAPOSD) of designated Biotic Habitat Areas.

Policy OSRC-7g: Where additional Biotic Habitat Areas are designated in Area Plans, revise such plans and guidelines as needed to provide protection of biotic resources equivalent or better than the protection provided by the General Plan.

Policy OSRC-7h: In coordination with resource agencies, landowners and affected public, conduct a comprehensive study of the cumulative impacts of habitat fragmentation and connectivity loss and the effects of exclusionary fencing on wildlife movement. If warranted, identify essential habitat connectivity corridors and develop recommendations for policies to protect essential habitat corridors and linkages and to restore and improve opportunities for native plant and animal dispersal.

Policy OSRC-7i: Conduct a comprehensive habitat identification and mapping program for use in future policy determinations.

Policy OSRC-7j: Establish a clearinghouse of information for public use related to biotic habitat protection and management and work toward making this information available by computer.

Policy OSRC-7k: Require the identification, preservation and protection of native trees and woodlands in the design of discretionary projects, and, to the maximum extent practicable, minimize the removal of native trees and fragmentation of woodlands, require any trees removed to be replaced, preferably on the site, and provide permanent protection of other existing woodlands where replacement planting does not provide adequate mitigation.

Policy OSRC-7l: Identify important oak woodlands, assess current protection, identify options to provide greater protection of oak woodlands and their role in connectivity, water quality and scenic resources, and develop recommendations for regulatory protection and voluntary programs to protect and enhance oak woodlands through education, technical assistance, easements and incentives.

Policy OSRC-7m: Designate important valley oak habitat areas, reevaluate current designations, and apply a Valley Oak Habitat combining district zoning that requires adequate mitigation for trees removed and monitoring of replacement tree survival.

Policy OSRC-7n: Encourage landowners to voluntarily participate in a program that protects officially designated individual trees or groves that either have historical interest or significance or have outstanding size, age, rarity, shape or location.

Policy OSRC-7o: Encourage the use of native plant species in landscaping. For discretionary projects, require the use of native or compatible non-native species for landscaping where consistent with fire safety. Prohibit the use of invasive exotic species.

Policy OSRC-7p: Support voluntary programs for habitat restoration and enhancement, hazardous fuel management, removal and control of invasive exotics, native plant revegetation, treatment of woodlands affected by Sudden Oak Death, use of fencerows and hedgerows, and management of biotic habitat.

Policy OSRC-7q: Participate in the development of a conservation strategy to preserve, restore and enhance the unique vernal pool habitat of the Santa Rosa Plain and protect the associated special-status species. Seek ways to minimize the adverse effects of irrigation on valley oaks and vernal pool habitat.

Policy OSRC-7r: Develop comprehensive programs for preservation and restoration of the freshwater marsh habitat of the Laguna de Santa Rosa area, the extensive marsh areas along the Petaluma River, other tidal marshes, and freshwater marshes such as the Pitkin, Kenwood, Cunningham, and Atascadero Marshes. Include mechanisms for preservation and enhancement such as land acquisition, zoning restrictions, public and private conservation easements, regulating filling, grading or construction, floodwater retention, and wetland restoration.

Policy OSRC-7s: Develop comprehensive programs for preservation and restoration of the San Pablo Bay area and shoreline habitats, including mechanisms for preservation and enhancement such as acquisition, zoning and easements and avoiding activities such as filling, grading or construction that would be detrimental to the biotic resources or historic water retention functions.

Policy OSRC-7t: Continue to actively participate in the FishNet4C program and work cooperatively with participating agencies to implement recommendations to improve and restore aquatic habitat for listed anadromous fish species and other fishery resources.

Policy OSRC-7u: Identify and consider designation of old growth Redwood and Douglas Fir as sensitive natural communities. Encourage preservation and public acquisition of remaining old growth Redwood and Douglas Fir forests in private ownership with the County. Because of their rarity and biological importance, these sensitive natural community types should be made priorities for protection through conservation easements, fee title purchase, or other mechanisms.

Water Resource Element

Water quality protection has long been a priority at all levels of government. In California, programs implementing the Federal Clean Water Act and the State Porter-Cologne Act are administered by the SWRCB and the nine regional water quality control boards (RWQCBs). In Sonoma County, the Sonoma Creek and Petaluma River watersheds are in the Bay Area RWQCB jurisdiction, and the remainder of the county is governed by the North Coast RWQCB. Waste discharge requirements are set by each RWQCB for point sources, including industrial and commercial uses, community wastewater management systems and individual septic systems. Implementation of point source controls has led to substantial increases in the level of treatment and quality of discharges. Over time, development and management of natural resources has resulted in erosion, sedimentation and degradation of surface water quality in the Russian River watershed and elsewhere. Surface water quality concerns in some watersheds include low levels of dissolved oxygen, high temperatures, and high levels of coliform bacteria, ammonia, nutrients, pathogens, metals, herbicides, pharmaceuticals and exotic species.

GOAL WR-1: Protect, restore and enhance the quality of surface and groundwater resources to meet the needs of all reasonable beneficial uses.

Objective WR-1.1: Work with the Regional Water Quality Control Boards (RWQCB) and interested parties in the development and implementation of RWQCB requirements.

Objective WR-1.2: Avoid pollution of stormwater, water bodies and groundwater.

Objective WR-1.3: Inform the public about practices and programs to minimize water pollution and provide educational and technical assistance to agriculture in order to reduce sedimentation and increase on-site retention and recharge of stormwater.

Objective WR-1.4: Seek and secure funding for development of countywide groundwater quality assessment, monitoring, management, and education regarding groundwater quality issues.

Objective WR-1.5: Seek to protect groundwater from saltwater intrusion.

The following policies, in addition to those in the Land Use, Open Space and Resource Conservation, and Public Facilities and Services Elements, shall be used to accomplish the above objectives:

Policy WR-1a: Coordinate with the RWQCB, public water suppliers, Cities, Resource Conservation Districts (RCDs), watershed groups, stakeholders and other interested parties to develop and implement public education programs and water quality enhancement activities and provide technical assistance to minimize stormwater pollution, support RWQCB requirements and manage related County programs. Where appropriate, utilize watershed planning approaches to resolve water quality problems.

Policy WR-1b: Design, construct, and maintain County buildings, roads, bridges, drainage and other facilities to minimize sediment and other pollutants in stormwater flows. Develop and implement "best management practices" for ongoing maintenance and operation.

Policy WR-1c: Prioritize stormwater management measures in coordination with the RWQCB direction, focusing first upon watershed areas that are urbanizing and watersheds with impaired water bodies. Work cooperatively with the RWQCBs to manage the quality and quantity of stormwater runoff from new development and redevelopment in order to:

(1) Prevent, to the maximum extent practicable, pollutants from reaching stormwater conveyance systems.
(2) Ensure, to the maximum extent practicable, that discharges from regulated municipal storm drains comply with water quality objectives.
(3) Limit, to the maximum extent practicable, stormwater from post development sites to pre-development quantities.
(4) Conserve and protect natural areas to the maximum extent practicable.

Policy WR-1d: Where appropriate, support RWQCB waste discharge requirements for all wastewater treatment systems and other point sources.

Policy WR-1e: Assist in the development of Total Maximum Daily Loads (TMDLs) for the impaired water bodies and pollutants of concern identified by the RWQCBs to achieve compliance with adopted TMDLs. Work with the RWQCB to develop and implement measures consistent with the adopted TMDLs.

Policy WR-1f: Work closely with the RWQCBs, incorporated cities, public water suppliers, and other interested parties in the development and implementation of water quality plans and measures.

Policy WR-1g: Minimize deposition and discharge of sediment, debris, waste and other pollutants into surface runoff, drainage systems, surface water bodies, and groundwater.

Policy WR-1h: Require grading plans to include measures to avoid soil erosion and consider upgrading requirements as needed to avoid sedimentation in stormwater to the maximum extent practicable.

Policy WR-1i: Develop standards for erosion and sediment control for orchards similar to the standards established for vineyards.

Policy WR-1j: Support educational technical assistance programs for agricultural activities and dissemination of best management practices for erosion and sediment control, which include on-site retention of stormwater, maintaining natural sheetflow and drainage patterns, and avoiding concentrated runoff, particularly on slopes greater than 35%.

Policy WR-1k: Seek opportunities to participate in developing programs and implementing projects for water quality restoration and remediation with agencies and organizations such as RWQCBs, the California Department of Fish and Game, and RCDs in areas where water quality impairment is a concern. Consider allowing expanded treatment options for contaminated water from individual wells.

Policy WR-1l: Consider development or expansion of community wastewater treatment systems in areas with widespread septic system problems that are a health concern and cannot be addressed by on-site maintenance and management programs.

Policy WR-1m: Consider on-site wastewater management districts in areas with septic problems.

Policy WR-1n: Initiate a review of any sewer systems when they persistently fail to meet applicable standards. If necessary, to assure that standards are met, the County may deny new development proposals or impose moratoria on building and other permits that would result in a substantial increase in demand and may impose strict monitoring requirements.

Policy WR-1o: Require that commercial and industrial uses reduce and pretreat wastes prior to their entering sewer systems.

Policy WR-1p: Actively pursue the abatement of failing septic systems that have been demonstrated as causing a health and safety hazard.

Policy WR-1q: Require new development projects to evaluate and consider naturally occurring and human caused contaminants in groundwater.

Policy WR-1r: Work with the Sonoma County Health Services Department and the RWQCBs to educate the general public on evaluating, monitoring and protecting the quality of groundwater.

Policy WR-1s: Resist accepting administrative responsibility for regulatory programs required by State or Federal agencies unless a State or Federal subvention will compensate the County for costs associated with such shift in administrative responsibility.

Policy WR-1t: Where area studies or monitoring find that saltwater intrusion has occurred, support analysis of how the intrusion is related to groundwater extraction and support development of a groundwater management plan or other appropriate measures to avoid further intrusion and, where practicable, reverse past intrusion.

Policy WR-1u: In the marshlands and agricultural areas south of Sonoma and Petaluma, require all environmental assessments and discretionary approvals to analyze and, where practicable, avoid any increase in saltwater intrusion into groundwater.

Policy WR-1v: Request that the SCWA revise the SCWA flood control design criteria to include a section on stream geomorphic analysis and to update information on bank protection and erosion control to incorporate biotechnical bank stabilization methods for the purpose of preventing erosion and siltation in drainage swales and streams.

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Appendix B

Regionally Occurring Listed and Special-Status Species

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Appendix B
Regionally Occurring Listed and Special-Status Species

Table 1 — Legally Protected Species

Special-Status Species				
Baker's larkspur *Delphinium bakeri*	FE; CE; --; 1B.1	Perennial herb that occurs in coastal scrub, upland forest, and grassland habitats. Usually on decomposed shale.	March – May	**None**. Decomposed shale and suitable habitat types do not occur in the Study Area.
Burke's goldfields *Lasthenia burkei*	FE; CE; --; 1B.1	Annual herb that occurs in vernal pools, seeps, and meadows.	April – June	**None**. No vernal pools, seeps or meadows occur in the Study Area. Closest documented occurrence is approximately 250 feet from the Study Area and there are six documented occurrences within five miles of the Study Area (CDFW 2020).
Clara Hunt's milk-vetch *Astragalus claranus*	FE; CT; --; 1B.1	Annual herb that grows in serpentinite or volcanic soil within open chaparral, mixed oak woodland, and grassland habitats.	March – May	**None**. Suitable soil types and habitats do not occur in the Study Area.
Contra Costa goldfields *Lasthenia conjugens*	FE; --; --; 1B.1	Annual herb that occurs in vernal pools within grassland and mixed woodland habitats.	March – June	**None**. No vernal pools occur in the Study Area and grassland and mixed woodland habitats are absent.
Golden larkspur *Delphinium luteum*	FE; --; --; 1B.1	Perennial herb that occurs in rocky coastal chaparral, prairie, and scrub habitats.	March – May	**None**. Suitable rocky habitats do not occur in the Study Area.
Kenwood Marsh checkerbloom *Sidalcea oregana* ssp. *valida*	FE; CE; --; 1B.1	Perennial herb that occurs in freshwater marshes and swamps.	June – September	**None.** Suitable marsh or swamp habitat does not occur in the Study Area.
Marin western flax *Hesperolinon congestum*	FT; CT; --; 1B.1	Annual herb that grows in serpentinite soil within chaparral and grassland habitats.	April – July	**None**. Serpentine soil does not occur in the Study Area.
North Coast semaphore grass *Pleuropogon hooverianus*	--; CT; --; 1B.1	Perennial grass that occurs in wetlands, meadows, vernal pools, and open areas of North Coast coniferous forest habitats.	April – June	**None**. Coniferous forest habitat does not occur in the Study Area and suitable aquatic habitat is absent. One documented occurrence within five miles of the Study Area (CDFW 2020).
Pitkin Marsh lily *Lilium pardalinum* ssp. *pitkinense*	FE; CE; --; 1B.1	Perennial herb that occurs in mesic, sandy, wetlands and freshwater marshes within woodland habitats.	June – July	**None**. Woodland habitat does not occur in the Study Area and mesic, sandy wetlands or marshes are absent. Although the drainage canal within the Study Area contains some wetland characteristics, the canal is lined with concrete and does not contain mesic, sandy substrate suitable for this species. Three documented occurrences within five miles of the Study Area (CDFW 2020).
Pitkin Marsh paintbrush *Castilleja uliginosa*	--; CE; --; 1A	Perennial herb that occurs in freshwater marshes and swamps. Last known remaining plant died in 1987 (CNPS 2020).	June – July	**None**. This species is thought to be extinct and is not known to occur near the Study Area.
Sebastopol meadowfoam *Limnanthes vinculans*	FE; CE; --; 1B.1	Annual herb that occurs in vernal pools, meadows, seeps, and vernally mesic grasslands.	April - May	**None**. No vernal pools, meadows, seeps, or vernally mesic grasslands occur in the Study Area Twenty-four documented occurrences within five miles of the Study Area (CDFW 2020).
Showy Indian clover *Trifolium amoenum*	FE; --; --; 1B.1	Annual herb that occurs in coastal grasslands and bluff habitats. Sometimes in serpentine soil.	April – June	**None**. Coastal grassland and bluff habitat does not occur in the Study Area. Two documented occurrences within five miles of the Study Area (CDFW 2020).
Soft salty bird's-beak *Chloropyron molle* ssp. *molle*	FE; --; --; 1B.2	Annual herb that occurs in coastal salt marsh and wetland habitats.	July – November	**None**. Coastal salt marsh or wetland habitat does not occur in the Study Area.
Sonoma alopecurus *Alopecurus aequalis* var. *sonomensis*	FE; --; --; 1B.1	Perennial herb that occurs in riparian scrub, and freshwater wetlands and swamps.	May – July	**Low**. Potential suitable habitat may occur within the drainage canal. One documented occurrence within five miles of the Study Area (CDFW 2020).
Sonoma spineflower *Chorizanthe valida*	FE; CE; --; 1B.1	Annual herb that occurs in coastal prairie habitats.	June – August	**None**. Coastal prairie habitat does not occur in the Study Area.
Sonoma sunshine *Blennosperma bakeri*	FE; CE; --; 1B.1	Annual herb that occurs in vernal pools and vernally mesic grasslands.	March – May	**None**. No vernal pools or vernally mesic grassland occurs in the Study Area. Nine documented occurrences within five miles of the Study Area (CDFW 2020).
Vine Hill manzanita *Arctostaphylos densiflora*	--; CE; --; 1B.1	Shrub that occurs in chaparral habitats with acidic marine sand.	February – April	**None**. Chaparral habitat and suitable acidic marine sand do not occur in the Study Area.

Special-Status Species				
California freshwater shrimp *Syncaris pacifica*	FE; CE; --; --	Occurs in small, perennial coastal streams with exposed live roots of trees. Banks that have overhanging woody debris or stream vegetation and vines such as stinging nettles, grasses, vine maple, and mint are preferred.	Year-round	**None**. Suitable perennial coastal streams do not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Crotch bumblebee *Bombus crotchii*	--; CCE; --; CSA	Occurs in grasslands, shrublands, and chaparral habitats. Floral species such as *Asclepias, Chaenactis, Lupinus*, and *Salvia* are necessary for this species	Spring – Fall	**None**. Suitable grassland, shrubland, or chaparral habitat does not occur in the Study Area.
San Bruno Elfin butterfly *Callophrys mossii bayensis*	FE; --; --; --	Occurs in areas of bare rock/talus, rocky outcrops, and cliffs within coastal scrub habitats along the San Francisco peninsula. Broadleaf stonecrop (*Sedum spathulifolium*) is this species host plant.	Spring – Fall	**None**. Suitable habitat does not occur in the Study Area.
Western bumblebee *Bombus occidentalis*	--; CCE; --; CSA	Occurs in grasslands, meadows, and chaparral habitats. Floral plants such as *Lupinus, Ceanothus, Centaurea, Rubus,* and *Trifolium* are necessary food sources. Queen establishes a colony within an abandoned rodent hole or other underground crevice.	Spring – Fall	**None**. Suitable grassland, meadow, or chaparral habitat does not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Coho salmon - Central California coast ESU *Oncorhynchus kisutch*	FE; CE; --; --	Occurs along the California coast and adults migrate to streams and rivers in November – December to spawn. Eggs are laid in cold gravel pockets and hatch in spring. Young Coho salmon may spend several years in their home stream before traveling to the ocean.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area.
Longfin smelt *Spirinchus thaleichthys*	FC; CT; --; --	Inhabits estuaries and bays in the Delta and Sacramento-San Joaquin Rivers. Migrates to freshwater to spawn.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area.
Steelhead - Central California coast DPS *Oncorhynchus mykiss irideus*	FT; --; --; --	Occurs in the Sacramento and San Joaquin rivers and their tributaries. Gravel substrate and well oxygenated water are necessary for fry development.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
California red-legged frog *Rana draytonii*	FT; --; CSC; --	Aquatic habitat typically includes slow-moving streams, ponds, or marsh communities with emergent vegetation. Prefers aquatic habitats within or near humid forests, woodlands, grasslands, or other cool, moist areas. Small standing pools (less than 3 feet deep) are typically used for breeding. Nearby upland habitat with downed debris or leaf litter for refuge is also required. Typically found in or within 300 feet of aquatic habitat but may disperse up to two miles away from aquatic habitats during breeding.	Year-round	**Low**. Potentially suitable aquatic habitat is present within the drainage canal but suitable upland habitat does not occur in the Study Area. If this species were to occur, it would likely be restricted to the channel outside of the Project footprint. Five documented occurrences within five miles of the Study Area (CDFW 2020).
California tiger salamander *Ambystoma californiense*	FT; CT; --; --	Requires both aquatic breeding habitat such as vernal pools, temporary ponds, stock ponds, or wetlands, and adjacent upland habitat with small mammal burrows present for refuge. Adults aestivate throughout summer and emerge after heavy rainfall to breed. This species is known to occur within the Central Valley, and Santa Barbara and Sonoma counties.	Year-round	**High**. Suitable aquatic habitat does not occur in the Study Area and no suitable burrows were observed within the Study Area during the field survey on February 25, 2020. However, suitable habitat is adjacent to the Study Area and this species may travel through the Study Area during breeding events. This species may also utilize the Study Area as upland refugia habitat if suitable burrows are present. Seventy documented occurrences within five miles of the Study Area (CDFW 2020). The Study Area is within designated Critical Habitat for this species.
Foothill yellow-legged frog *Rana boylii*	--; CCE; CSC; --	Occurs in rocky streams, creeks, and rivers; especially in areas with sunny banks and riffles. Rarely found far from water. Generally, occurs in forest, chaparral, and woodland habitats.	Year-round	**None**. Suitable rocky aquatic habitat does not occur in the Study Area. Five documented occurrences within five miles of the Study Area (CDFW 2020).
Green sea turtle *Chelonia mydas*	FT; --; --; --	Occurs in shallow waters inside reefs, bays, and inlets. The turtles are attracted to lagoons and shoals with an abundance of marine grass and algae. Open beaches with a sloping platform and minimal disturbance are required for nesting.	Year-round	**None**. Suitable habitat does not occur in the Study Area.

Special-Status Species				
Bank swallow *Riparia riparia*	--; CT; --; --	Locally common California breeding resident that occurs in open areas near water. This species nests along cliff edges, banks, bluffs, and similar features. Friable soil and tall, vertical edges are necessary for nesting. Often nests in large colonies along rivers.	Spring – Fall	**None**. Suitable nesting habitat does not occur within or near the Study Area.
California black rail *Laterallus jamaicensis coturniculus*	--; CFP; CT; --	Occurs in marsh habitats, typically saltwater or brackish marshes that border bays. However, small isolated populations are known from the Sierra Nevada foothills. Requires shallow permanent water within the marsh and dense vegetation.	Year-round	**None**. Suitable marsh habitat with dense vegetation does not occur in the Study Area.
California Ridgeway's rail *Rallus obsoletus obsoletus*	FE; CE; CFP; --	Occurs in salt marsh habitats in the San Francisco estuary, San Pablo Bay, and the Suisun Marsh that are dominated by pickleweed (*Salicornia* ssp.) and cordgrasss (*Spartina* ssp.). Nests in a thick clump of vegetation above flood level.	Year-round	**None**. Salt marsh habitat does not occur in the Study Area.
Golden eagle *Aquila chrysaetos*	--; CFP; --; --	Occurs in a variety of habitats including shrublands, canyons, woodlands, and grasslands. Typically avoids areas with human activity. Constructs nest on a platform of a cliff, within a large tree, or on isolated structures such as transmission towers. Often nests near open foraging habitat, preferably hilly grasslands.	Year-round	**None**. Suitable habitat does not occur within the Study Area and the Study Area is located in an area with high human activity.
Northern spotted owl *Strix occidentalis caurina*	FT; CT; CSC; --	Occurs in mature forests with a high degree of structural complexity. Structural components include a multilayered canopy, large conifer trees, shade-tolerant understory, moderate to high canopy closure, live coniferous trees with deformities (e.g., cavities, broken tops, mistletoe infections), large snags, and large logs and other downed woody debris. Occurs in habitats where prey such as woodrats or flying squirrels are present.	Year-round	**None**. Suitable forest habitat does not occur in the Study Area.
Swainson's hawk *Buteo swainsonii*	--; CT; --; --	Found in a variety of habitats including grasslands, agricultural areas, and open woodlands. Often nests peripherally to riparian systems or other aquatic habitats; nests in lone trees or groves of trees in agricultural fields, residential trees, or road break trees when aquatic habitat is absent. Prefers nest sites adjacent to open areas suitable for foraging. Trees greater than 30 feet in height are generally used for nesting.		**None**. Suitable habitat does not occur in the Study Area and the Study Area is outside of the known range of this species.
Tricolored blackbird *Agelaius tricolor*	--; CT; CSC; --	Nests in colonies near open fresh water; usually within emergent wetland habitat with tall, dense cattails, tule, willow, blackberry, and other marshy vegetation. Forages in open grassland, wetland, and agricultural habitats.	Year-round	**None**. Suitable nesting or foraging habitat does not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Western yellow-billed cuckoo *Coccyzus americanus occidentalis*	FT; CE; --; --	Occurs in large, dense riparian habitats, particularly cottonwood-willow riparian complexes. Studies in Sacramento have found nesting yellow-billed cuckoos occupied habitats of 25 acres or more of riparian habitat, with 99 acres being the average habitat size.	Year-round	**None**. Large, dense riparian habitat does not occur in the Study Area. Two documented occurrences within five miles of the Study Area (CDFW 2020).
White-tailed kite *Elanus leucurus*	--; CFP; --; --	Occurs in a variety of habitats and are common in savannah, open oak woodland, marsh, grassland, and agricultural habitats. Forages over open areas and nests in trees growing in isolation or on a forest/woodland edge.	Year-round	**Low**. No suitable nest trees occur within the Study Area but this species may forage within the Study Area and nest in nearby adjacent trees. One documented occurrence within five miles of the Study Area (CDFW 2020).
Salt-marsh harvest mouse *Reithrodontomys raviventris*	FE; CE; CFP; --	Occurs in salt marshes with dense pickleweed stands. Range is restricted to marshes around San Pablo Bay up to the Petaluma Marsh, marshes around Suisun Bay east to the San Joaquin/Sacramento River Delta, and marshes near San Francisco Bay.	Year-round	**None**. Salt marsh habitat does not occur in the Study Area and the Study Area is outside of the known range of this species.

Table 1 includes federal threatened or endangered species and eagles, and State threatened, endangered, or fully protected species.

Table 2 — Species Subject to CEQA Review

Special-Status Species				
Alkali milk-vetch *Astragalus tener* var. *tener*	--; --; --; 1B.2	Annual herb that occurs in alkaline vernal pools and playas.	March - June	**None**. No alkaline vernal pools or playas occur in the Study Area.
Baker's navarretia *Navarretia leucocephala* ssp. *bakeri*	--; --; --; 1B.1	Annual herb that occurs in vernal pools and meadows.	April – July	**None**. No vernal pools or meadows occur in the Study Area. Four documented occurrences within five miles of the Study Area (CDFW 2020).
Bent-flowered fiddleneck *Amsinckia lunaris*	--; --; --; 1B.2	Annual herb that occurs in coastal scrub, mixed woodland, and grassland habitats.	March – June	**None**. Coastal scrub, mixed woodland and grassland does not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Big-scale balsamroot *Balsamorhiza macrolepis*	--; --; --; 1B.2	Perennial herb that chaparral, mixed oak woodland, and grassland habitats; sometimes in serpentine soil.	March - June	**None**. Chaparral, mixed oak woodland, and grasslands do not occur in the Study Area. Two documented occurrences within five miles of the Study Area (CDFW 2020).
Brownish beaked-rush *Rhynchospora capitellata*	--; --; --; 2B.2	Perennial herb that occurs in seeps, freshwater marshes, and meadows within coniferous forest habitats.	July – August	**None**. Coniferous forest habitat does not occur in the Study Area and suitable aquatic habitats are absent.
California beaked-rush *Rhynchospora californica*	--; --; --; 1B.1	Perennial herb that occurs in bogs, seeps, and freshwater marshes within lower coniferous forest habitats.	May – July	**None**. Suitable aquatic habitat does not occur in the Study Area and coniferous forest habitat is absent. One documented occurrence within five miles of the Study Area (CDFW 2020).
California beaked-rush *Rhynchospora californica*	--; --; --; 1B.1	Perennial herb that occurs in bogs, seeps, freshwater marshes, and meadows within coniferous forest habitats.	May – July	**None**. Coniferous forest habitat does not occur in the Study Area and suitable aquatic habitats are absent.
Calistoga ceanothus *Ceanothus divergens*	--; --; --; 1B.2	Shrub that grows in serpentine or volcanic soil within chaparral habitats.	February – April	**None**. Suitable soil types do not occur in the Study Area and chaparral habitat is absent.
Coastal triquetrella *Triquetrella californica*	--; --; --; 1B.2	Moss that occurs in coastal bluff and scrub habitats.	Year-round	**None**. Coastal bluff and scrub habitats do not occur in the Study Area.
Colusa layia *Layia septentrionalis*	--; --; --; 1B.2	Annual herb that occurs in chaparral, mixed woodland, and grassland habitats.	April – May	**None**. Chaparral, mixed oak woodland, and grassland does not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Congested-headed hayfield tarplant *Hemizonia congesta* ssp. *congesta*	--; --; --; 1B.2	Annual herb that occurs in coastal scrub and grassland habitats.	April – November	**None**. Coastal scrub and grassland do not occur in the Study Area. Two documented occurrences within five miles of the Study Area (CDFW 2020).
Cunningham Marsh cinquefoil *Potentilla uliginosa*	--; --; --; 1A	Perennial herb that occurs in freshwater marshes and swamps. Only known from the Cunningham Marsh.	May – August	**None**. The Study Area is outside of the known range of this species and marsh and swamp habitat is absent. One documented occurrence within five miles of the Study Area (CDFW 2020).
Dwarf downingia *Downingia pusilla*	--; --; --; 2B.2	Annual herb that occurs in vernal pools.	March – May	**None**. No vernal pools occur in the Study Area. Two documented occurrences within five miles of the Study Area (CDFW 2020).
Fragrant fritillary *Fritillaria liliacea*	--; --; --; 1B.2	Perennial herb that occurs in coastal prairie and scrub, mixed woodlands, and grasslands. Often found in serpentine soil.	February – April	**None**. Coastal prairie, scrub, mixed woodlands, and grasslands do not occur in the Study Area. Three documented occurrences within five miles of the Study Area (CDFW 2020).
Franciscan onion *Allium peninsulare* var. *franciscanum*	--; --; --; 1B.2	Perennial herb that occurs in clay, volcanic, and serpentine soils within woodland and grassland habitats.	May – June	**None**. Suitable soil types do not occur in the Study Area and woodland and grassland habitat is absent.
Franciscan thistle *Cirsium andrewsii*	--; --; --; 1B.2	Perennial herb that occurs in coastal scrub, prairie, bluff, and forest habitats. Sometimes within serpentine soil.	March – July	**None**. Coastal scrub, prairie, bluff, and forest habitats do not occur in the Study Area.
Holly-leaved ceanothus *Ceanothus purpureus*	--; --; --; 1B.2	Shrub that grows in volcanic, rocky soils within chaparral habitats.	March – May	**None**. Suitable soil types do not occur in the Study Area and chaparral habitat is absent.
Jepson's leptosiphon *Leptosiphon jepsonii*	--; --; --; 1B.2	Annual herb that grows in volcanic soils within chaparral, mixed woodland, and grassland habitats.	March – May	**None**. Volcanic soil does not occur in the Study Area and suitable habitats are absent.
Legenere *Legenere limosa*	--; --; --; 1B.1	Annual herb that occurs in vernal pools.	April – June	**None**. No vernal pools occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).

Special-Status Species				
Marin checker lily *Fritillaria lanceolata* var. *tristulis*	--; --; --; 1B.1	Perennial herb that occurs in coastal scrub, bluff, and prairie habitats.	February – May	**None**. Coastal scrub, bluff, and prairie habitats do not occur in the Study Area.
Marsh microseris *Microseris paludosa*	--; --; --; 1B.2	Perennial herb that occurs in coastal scrub, grassland, and woodland habitats.	April – June	**None**. Coastal scrub, grassland, and woodland habitat does not occur in the Study Area. Two documented occurrences within five miles of the Study Area (CDFW 2020).
Mason's ceanothus *Ceanothus masonii*	--; --; --; 1B.2	Shrub that grows in serpentine soil within chaparral habitats; especially within rocky, open areas.	March – April	**None**. Serpentine soil does not occur in the Study Area and chaparral habitat is absent.
Napa false indigo *Amorpha californica* var. *napensis*	--; --; --; 1B.2	Shrub that occurs in open woodlands and chaparral habitats.	April – July	**None**. Open woodland and chaparral do not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Narrow-anthered brodiaea *Brodiaea leptandra*	--; --; --; 1B.2	Perennial herb that grows in volcanic soils within chaparral, woodland, and grassland habitats.	May – July	**None**. Volcanic soil does not occur in the Study Area and suitable habitats are absent.
Oval-leaved viburnum *Viburnum ellipticum*	--; --; --; 2B.3	Shrub that occurs in chaparral and coniferous forest habitats.	May – June	**None**. Chaparral and coniferous forest habitat do not occur in the Study Area.
Pacific Grove clover *Trifolium polyodon*	--; --; --; 1B.1	Annual herb that occurs in coastal prairies, meadows, seeps, and grasslands, within coniferous forest habitats.	April – June	**None**. Coniferous forest habitat does not occur in the Study Area and suitable habitats are absent.
Pappose tarplant *Centromadia parryi* ssp. *parryi*	--; --; --; 1B.2	Annual herb that occurs in alkaline vernal pools, seeps, and vernally mesic grasslands.	May – October	**None**. Alkaline vernal pools, seeps, and vernally mesic grasslands do not occur in the Study Area.
Peruvian dodder *Cuscuta obtusiflora* var. *glandulosa*	--; --; --; 2B.2	Annual vine that occurs in freshwater marshes and swamps.	July – October	**None**. Freshwater marsh and swamp habitat does not occur in the Study Area.
Petaluma popcornflower *Plagiobothrys mollis* var. *vestitus*	--; --; --; 1A	Perennial herb that occurs in coastal salt marsh and mesic grassland habitats.	June – July	**None**. Coastal salt marsh and mesic grassland habitats do not occur in the Study Area.
Point Reyes salty bird's-beak *Chloropyron maritimum* ssp. *palustre*	--; --; --; 1B.2	Annual herb that occurs in coastal salt marsh habitats.	June – October	**None**. Coastal salt marsh habitat does not occur in the Study Area.
Rincon Ridge manzanita *Arctostaphylos stanfordiana* ssp. *decumbens*	--; --; --; 1B.1	Shrub that occurs in chaparral habitats, often rhyolitic.	February – April	**None**. Chaparral habitat does not occur in the Study Area.
Round-headed beaked-rush *Rhynchospora globularis*	--; --; --; 2B.1	Perennial herb that occurs in freshwater marshes and swamps.	July – August	**None**. Freshwater marsh and swamp habitat do not occur in the Study Area.
Saline clover *Trifolium hydrophilum*	--; --; --; 1B.2	Annual herb that occurs in vernal pools.	April – June	**None**. No vernal pools occur in the Study Area. Four documented occurrences within five miles of the Study Area (CDFW 2020).
Santa Cruz clover *Trifolium buckwestiorum*	--; --; --; 1B.1	Annual herb that occurs in gravelly areas of coastal prairie and woodland habitats.	April – October	**None**. Coastal prairie and woodland do not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Sonoma beardtongue *Penstemon newberryi* var. *sonomensis*	--; --; --; 1B.3	Perennial herb that occurs in rocky chaparral habitats.	April – August	**None**. Rocky chaparral habitat does not occur in the Study Area.
Sonoma ceanothus *Ceanothus sonomensis*	--; --; --; 1B.2	Shrub that grows in sandy, serpentine or volcanic soils within chaparral habitats.	February – April	**None**. Suitable soil types do not occur in the Study Area and chaparral habitat is absent.
Swamp harebell *Campanula californica*	--; --; --; 1B.2	Perennial herb that occurs in bogs, freshwater marsh, meadow, and seep habitats within coastal prairie and coastal coniferous forest habitats.	June – October	**None**. Coastal prairie and redwood habitats do not occur in the Study Area.
Thin-lobed horkelia *Horkelia tenuiloba*	--; --; --; 1B.2	Perennial herb that occurs in chaparral, upland forest, and grassland habitats; especially in mesic, sandy, open areas.	May – July	**None**. Chaparral, upland forest, and grassland habitats do not occur in the Study Area.
Thurber's reed grass *Calamagrostis crassiglumis*	--; --; --; 2B.1	Perennial herb that occurs in coastal scrub and freshwater marsh habitats.	May – August	**None**. Coastal scrub and freshwater marsh do not occur in the Study Area.
Tiburon buckwheat *Eriogonum luteolum* var. *caninum*	--; --; --; 1B.2	Annual herb that grows in sandy or gravelly serpentine soil within chaparral, mixed woodland, coastal prairie, and grassland habitats.	May – September	**None**. Serpentine soil does not occur in the Study Area and suitable habitats are absent.
White beaked-rush *Rhynchospora alba*	--; --; --; 2B.2	Perennial herb that occurs in freshwater marsh and bog habitats.	July – August	**None**. Freshwater marsh and bog habitat do not occur in the Study Area.
Woolly-headed gilia *Gilia capitata* ssp. *tomentosa*	--; --; --; 1B.1	Annual herb that grows in rocky, serpentine soil within coastal scrub and grassland habitats.	May – July	**None**. Serpentine soil does not occur in the Study Area and suitable habitats are absent.

Special-Status Species				
Sacramento splittail *Pogonichthys macrolepidotus*	--; --; CSC; --	Endemic to the Central Valley. This species is largely confined to the Delta, Suisun Bay, Suisun Marsh, Napa River, Petaluma River, and Sacramento-San Joaquin estuary. This species predominantly occurs in freshwater estuarine systems and prefers low-salinity, shallow-water habitats. Occurs in slow-moving sections of rivers, sloughs, and marshes. Species abundance is strongly tied to outflows because spawning occurs over flooded vegetation (Moyle et al. 2015).	Year-round	**None**. The Study Area is outside of the known range of this species and there is not suitable aquatic habitat present within the Study Area.
Tomales roach *Lavinia symmetricu*	--; --; CSC; --	Restricted to drainages in western Marin County. Known to occur in Lagunitas and Walker Creek. Spawn in gravel beds or riffles.	Year-round	**None**. The Study Area is outside of the known range of this species and there is not suitable aquatic habitat present within the Study Area.
Western pond turtle *Emys marmorata*	--; --; CSC; --	Occurs in a variety of aquatic habitats such as ponds, creeks, ditches, lakes, and marshes. Prefers areas with abundant vegetation and rocky or muddy substrate. Exposed banks or other basking areas such as logs or cattail mats are required. Upland habitat typically occurs within woodlands, forests, or grasslands that are within the vicinity of aquatic habitat.	Year-round	**Low**. The drainage canal may provide suitable habitat for this species. Upland habitat does not occur in the Study Area and if this species were to occur, it would likely be within the channel outside of the Project footprint. Ten documented occurrences within five miles of the Study Area (CDFW 2020).
Red-bellied newt *Taricha rivularis*	--; --; CSC; --	Occurs in rapid flowing, rocky, permanent streams/creeks in redwood forest and coastal woodland habitats. Breeding occurs in February – May in clean, rocky streams and adults travel to breeding locations during heavy rain storms.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area and redwood and coastal woodlands are absent.
Allen's hummingbird *Selasphorus sasin*	--; FSC; --; --	Occurs in coastal forest, scrub, and chaparral habitats. Often nests near shady streams in blackberry, eucalyptus, cypress, or Douglas-fir. Winters in Mexico and some year-round residents occur in southern California.	Spring – Summer	**None**. Coastal forest, scrub, and chaparral habitats do not occur in the Study Area.
Burrowing owl *Athene cunicularia*	--; --; CSC; --	Occurs in a variety of open habitats; typically grasslands, desert scrub, agricultural fields, washes, and disturbed areas such as golf courses or vacant lots. Burrows, perch sites, and friable soil are necessary for this species, and areas with low-lying, sparse vegetation are preferred. May utilize culverts, abandoned pipes, rubble piles, and other manmade structures for nesting if burrows are absent.	Year-round	**None**. No suitable burrows or other refugia structures occur within the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
California horned lark *Eremophila alpestris actia*	--; --; --; CSA	Occurs in open grasslands dominated by sparse, low, herbaceous vegetation or scattered low shrubs. Often avoids areas with grass taller than a few inches. Nests on the ground, often next to a dense clump of grass or debris pile.	Year-round	**None**. Suitable grassland habitat does not occur in the Study Area.
Cooper's hawk *Accipiter cooperii*	--; --; --; CSA	Occurs in open woodlands, riparian forests, montane coniferous forests, and other open woodland habitats. May also occur in wooded suburban habitats. Nests high within a large tree.	Year-round	**None**. Although some trees are present within the Study Area, the Study Area is located in an open habitat and lacks woodland components suitable for this species. One documented occurrence within five miles of the Study Area (CDFW 2020).
Ferruginous hawk *Buteo regalis*	--; --; --; CSA	A winter resident in California that occurs in open habitats such as grasslands, shrub-steppes, sagebrush, deserts, and outer edges of pinyon-pine and other coniferous forest habitats. Not known to breed in California.	November – February	**None**. Suitable wintering habitat does not occur in the Study Area.
Grasshopper sparrow *Ammodramus savannarum*	--; --; CSC; --	Occurs in dense, dry, or well-drained grasslands, especially native grasslands. Nests at base of overhanging clump of grass. This species is known from Los Angeles, Mendocino, Orange, Placer, Sacramento, San Diego, San Luis Obispo, Solano, and Yuba counties.	Year-round	**None**. Grassland habitat does not occur in the Study Area.

Special-Status Species				
Long-billed curlew *Numenius americanus*	--; FSC; --; --	In California, only known to breed in wet meadow habitats in Siskiyou, Modoc, and Lassen counties. Winters along the coast and in the Central and Imperial Valleys. Typically occurs in wetlands, estuaries, mudflats, agricultural fields, shortgrass prairies and alkali lakes.	Year-round	**None**. The Study Area is outside of the known range of this species and suitable habitats are absent.
Saltmarsh common yellowthroat *Geothlypis trichas sinuosa*	--; --; --; CSA	Occurs in woody swamp, brackish marsh, and freshwater marsh habitats. Nests in stands of dense emergent vegetation or shrubs. Only known to occur along the coast in Marin County, around the San Pablo Bay, southern San Francisco Bay, and San Mateo County.	Year-round	**None**. Suitable habitat does not occur in the Study Area and the Study Area is outside of the known range of this species.
San Pablo song sparrow *Melospiza melodia samuelis*	--; --; CSC; --	Occurs in tidal salt marsh habitats with dense vegetation. Habitats dominated by pickleweed, cordgrass, and gumplant (*Grindelia hirsutula*) appear to be preferred. Only known to occur in the San Francisco estuary and around San Pablo Bay.	Year-round	**None**. Tidal salt marsh habitat does not occur in the Study Area and the Study Area is outside of the known range of this species.
Yellow rail *Coturnicops noveboracensis*	--; --; CSC; --	Relatively rare in California; known to winter in coastal marshes and the Suisun Marsh region, and known to summer and breed in Mono County.	Year-round	**None**. Coastal marsh habitat does not occur in the Study Area and the Study Area is outside of the known range of this species.
American badger *Taxidea taxus*	--; --; CSC; --	Occurs in a variety of dry, open habitats including grasslands, open woodlands, shrublands, and open chaparral. Loose, friable soil is required for this species to dig den sites.	Year-round	**None**. Suitable habitats do not occur in the Study Area and no suitable burrows were observed during the field survey on February 25, 2020. Four documented occurrences within five miles of the Study Area (CDFW 2020).
Fringed myotis *Myotis thysanodes*	--; --; --; CSA	Occurs in a variety of habitats, especially pinyon-juniper, valley foothill hardwood, and hardwood-conifer. Roosts in caves, mines, abandoned buildings, and rocky crevices. Typically forages over water.	Year-round	**None**. Suitable roosts do not occur in the Study Area and suitable habitat types are absent.
Hoary bat *Lasiurus cinereus*	--; --; --; CSA	Occurs in a variety of forest habitats and prefers open areas and areas of habitat mosaics. Roosts in dense tree foliage in medium to large trees.	Year-round	**None**. Suitable forest habitat does not occur in the Study Area.
Long-legged myotis *Myotis volans*	--; --; --; CSA	Occur in a variety of habitats including forest, chaparral, woodland or scrub; usually above 4,000 feet. Roosts in rocky crevices, hollow trees, under tree bark, caves, or abandoned buildings.	Year-round	**None**. Suitable roosts do not occur in the Study Area and suitable habitat types are absent.
North American porcupine *Erethizon dorsatum*	--; --; --; CSA	Occurs in montane coniferous forests that contain a good understory of herbs, grasses, and shrubs; and also in wet meadow habitats. Dens in caves, rock crevices, hollow logs, snags, abandoned burrows, and dense foliage.	Year-round	**None**. Suitable forest habitat does not occur in the Study Area.
Pallid bat *Antrozous pallidus*	--; --; CSC; --	Occurs in a variety of habitats including desert scrub, grassland, oak woodland, savannah, and riparian forests up to about 6,500 feet elevation. Day roosts include caves, rock crevices, mines, and occasionally in hollow trees and abandoned buildings. Maternity roosts are typically in rock crevices, caves, or man-made structures. Extremely sensitive to disturbance of maternity roosts.	Year-round	**None**. Suitable roosts do not occur in the Study Area and suitable habitat types are absent.
Townsend's big-eared bat *Corynorhinus townsendii*	--; --; CSC; --	Occurs in a variety of habitats and appears most abundant in mesic habitats. Requires caves, rock outcrops, mines, tunnels, buildings or other man-made structures for roosting. Maternity roosts are found in warm caves, tunnels, mines, or abandoned buildings. Extremely sensitive to disturbance of maternity roosts; even one disturbance can cause complete abandonment.	Year-round	**None**. Suitable roosts do not occur in the Study Area.
Western red bat *Lasiurus blossevillii*	--; --; CSC; --	Occurs in a variety of forest habitats and prefers open areas and habitat mosaics. Roosts in trees that are protected from above and open below.	Year-round	**None**. Suitable forest habitat does not occur in the Study Area.

Special-Status Species				
Yuma myotis *Myotis yumanensis*	--; --; --; CSA	Occurs in a variety of habitats and is rarely found away from open water. Typically roosts in caves, along cliffs, in tunnels, or in buildings. Maternity roosts occur in abandoned buildings, caves, mines, or under bridges. Forages over water and open spaces.	Year-round	**None**. Suitable roosts do not occur in the Study Area.

Table 2 includes state and federal species of concern and Rank 1 and 2 CNPS species.
Moyle, P.B., R. M. Quiñones, J. V. Katz and J. Weaver. 2015. Fish Species of Special Concern in California. Sacramento: California Department of Fish and Wildlife. www.wildlife.ca.gov.

Table 3 — Other Species of Interest

Special-Status Species				
Marin knotweed *Polygonum marinense*	--; --; --; 3.1	Annual herb that occurs in coastal salt marsh and wetland habitats.	May – August	**None**. Coastal salt marsh and wetland habitats do not occur in the Study Area.
California linderiella *Linderiella occidentalis*	--; --; --; CSA	Typically occurs in vernal pools but can also occur in wetlands, alkali pools, and swales. Habitats can range in size and depth, but this species is generally found in deeper pools. Pools must remain inundated for at least 30 days to complete this species lifecycle.	Year-round	**None**. No vernal pools or other suitable aquatic habitats occur in the Study Area. Four documented occurrences within five miles of the Study Area (CDFW 2020).
Ricksecker's water scavenger beetle *Hydrochara ricksecker*i	--; --; --; CSA	Occurs in shallow lacustrine waters of creeks, artificial ponds, springs and brooks. Known to occur along the San Francisco Bay within Alameda, Marin, San Mateo and Sonoma counties. Can also be found in Lake, Placer, Sacramento, San Joaquin, and Solano counties.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Blennosperma vernal pool andrenid bee *Andrena blennospermatis*	--; --; --; CSA	Found in upland areas near vernal pools on the stickyseed (*Blennosperma* spp.) host plant. Known to occur in Solano, Sonoma, and Tehama counties. Populations historically found in Contra Costa, El Dorado, Lake, Sacramento, San Joaquin, and Yolo counties are possibly extirpated or extirpated.	Year-round	**None**. No vernal pools or stickseed plants occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Obscure bumblebee *Bombus caliginosus*	--; --; --; CSA	Occurs in grassy coastal prairies and meadows. Known to nest in underground burrows and in abandoned bird nests. Feeds on floral species such as *Ceanothus, Clarkia, Lotus, Rubus*, and *Vaccinium*.	Year-round	**None**. Coastal prairie and meadow habitat do not occur in the Study Area. One documented occurrence within five miles of the Study Area (CDFW 2020).
Tomales isopod *Caecidotea tomalensis*	--; --; --; CSA	Occurs in still to slow-moving vegetated streams. Known from Sonoma and San Mateo counties.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area.
Leech's skyline diving beetle *Hydroporus leechi*	--; --; --; CSA	Occurs along the shore in shallow freshwater habitats.	Year-round	**None**. Suitable aquatic habitat does not occur in the Study Area.
California brackishwater snail *Tryonia imitator*	--; --; --; CSA	Occurs in brackish salt marshes near San Francisco Bay and the southern California coast.	Year-round	**None**. Brackish salt marsh habitat does not occur in the Study Area.

Table 3 includes Rank 3 and 4 CNPS species and non-listed invertebrates, which may not be subject to CEQA review.

Regulatory Status Definitions
FE: Federal Endangered
FT: Federal Threatened
FTC: Federal Candidate Threatened
FC: Federal Candidate for Listing
FSC: Federal Special Concern
FD: Federal Delisted
CE: California Endangered
CT: California Threatened
CFP: California Fully Protected
CCT: California Candidate Threatened
CSC: California Special Concern
CSA: California Special Animal

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Appendix C

Plant and Wildlife Species Observed in the Study Area

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Appendix C
Plant Species Observed in the Study Area

Family		
Apiaceae	*Anthriscus caucalis*	Bur chervil
Apiaceae	*Conium maculatum*	Poison hemlock
Apiaceae	*Foeniculum vulgare*	Sweet fennel
Asteraceae	*Centaurea solstitialis*	Yellow star thistle
Asteraceae	*Helminthotheca echioides*	Bristly ox-tongue
Asteraceae	*Lactuca serriola*	Prickly lettuce
Asteraceae	*Xanthium strumarium*	Rough cocklebur
Brassicaceae	*Lepidium latifolium*	Broadleaved pepperweed
Dipsacaceae	*Dipsacus fullonum*	Fuller's teasel
Euphorbiaceae	*Euphorbia peplus*	Petty spurge
Fabaceae	*Trifolium hirtum*	Rose clover
Fabaceae	*Vicia sativa*	Spring vetch
Geraniaceae	*Geranium molle*	Crane's bill geranium
Juncaceae	*Juncus* ssp.	Rush
Juncaceae	*Juncus phaeocephalus*	Brown headed rush
Poaceae	*Arundo donax*	Giant reed
Poaceae	*Cynodon dactylon*	Bermuda grass
Poaceae	*Paspalum dilatatum*	Dallis grass
Poaceae	*Avena fatua*	Wild oats
Poaceae	*Phalaris aquatica*	Harding grass
Rosaceae	*Rubus armeniacus*	Himalayan blackberry
Rosaceae	*Prunus cerasifera*	Cherry plum
Salicaceae	*Salix* ssp.	Willow

Appendix C (cont.)
Wildlife Species Observed in the Study Area

Scientific Name	
Buteo lineatus	Red-shouldered hawk
Calypte anna	Anna's hummingbird
Cathartes aura	Turkey vulture
Colaptes auratus	Northern flicker
Corvus brachyrhyrnchos	American crow
Junco hyemalis	Dark-eyed junco
Mimus polyglottos	Northern mockingbird
Sayornis nigricans	Black phoebe
Turdus migratorius	American robin
Zonotrichia leucophrys	White-crowned sparrow

Appendix D

Representative Site Photos

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Photo 1. Study Area and proposed monopine tower location; facing east.

Photo 2. Proposed driveway location; facing west.

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Photo 3. Northeast corner of proposed AT&T lease area; facing southwest.

Photo 4. Study Area and proposed tower location; facing west.

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Photo 5. Area south of Study Area; facing south.

Photo 6. Area north of Study Area; facing north.

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Photo 7. Existing utility pole and proposed AT&T power and telco P.O.F. location; facing northwest.

Photo 8. Drainage canal within Study Area; facing east.

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Photo 9. Opposite bank of drainage canal looking towards Study Area; facing south.

Photo 10. Photo of drainage canal.

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Radio Frequency – Electromagnetic Energy (RF-EME) Compliance Report

Site No. CCL06387
MRSFR054921
Santa Rosa & Hwy 101
4515 Santa Ross Avenue
Santa Rosa, California 95407
Sonoma County
38.371936; -122.712878 NAD83
Monotree

The proposed AT&T installation will be in compliance with FCC regulations upon proper installation of recommended signage.

EBI Project No. 6219005294
October 20, 2019

Prepared for:

AT&T Mobility, LLC
c/o Complete Wireless Consulting Inc
2009 V St
Sacramento, California 95818

Prepared by:

EBI Consulting
environmental | engineering | due diligence

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APPENDICES

EXECUTIVE SUMMARY

Purpose of Report

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by AT&T Mobility, LLC to conduct radio frequency electromagnetic (RF-EME) modeling for AT&T Site CCL06387 located at 4515 Santa Ross Avenue in Santa Rosa, California to determine RF-EME exposure levels from proposed AT&T wireless communications equipment at this site. As described in greater detail in Section 1.0 of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

This report contains a detailed summary of the RF EME analysis for the site, including the following:

- Site Plan with antenna locations
- Graphical representation of theoretical MPE fields based on modeling
- Graphical representation of recommended signage and/or barriers

This document addresses the compliance of AT&T's transmitting facilities independently and in relation to all collocated facilities at the site.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits <u>and</u> there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

As presented in the sections below, based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

As such, the proposed AT&T installation is in compliance with FCC regulations upon proper installation of recommended signage and/or barriers.

AT&T Recommended Signage/Compliance Plan

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Site compliance recommendations have been developed based upon protocols presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, additional guidance provided by AT&T, EBI's understanding of FCC and OSHA requirements, and common industry practice. Barrier locations have been identified (when required) based on guidance presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014.

The following signage is recommended at this site:

- Yellow CAUTION 2B sign posted at the base of the monotree.

The signage proposed for installation at this site complies with AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document and therefore complies with FCC and OSHA requirements. Barriers are not recommended on this site. More detailed information concerning site compliance recommendations is presented in Section 4.0 and Appendix B of this report.

1.0 FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/ controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table 1 and Figure 1 (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm^2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm^2) and an uncontrolled MPE of 1 mW/cm2 for equipment operating in the 1900 MHz frequency range. For the AT&T equipment operating at 850 MHz, the FCC's occupational MPE is 2.83 mW/cm^2 and an uncontrolled MPE of 0.57 mW/cm^2. For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE is 2.33 mW/cm^2 and an uncontrolled MPE of 0.47 mW/cm^2. These limits are considered protective of these populations.

Table 1: Limits for Maximum Permissible Exposure (MPE)

(A) Limits for Occupational/Controlled Exposure

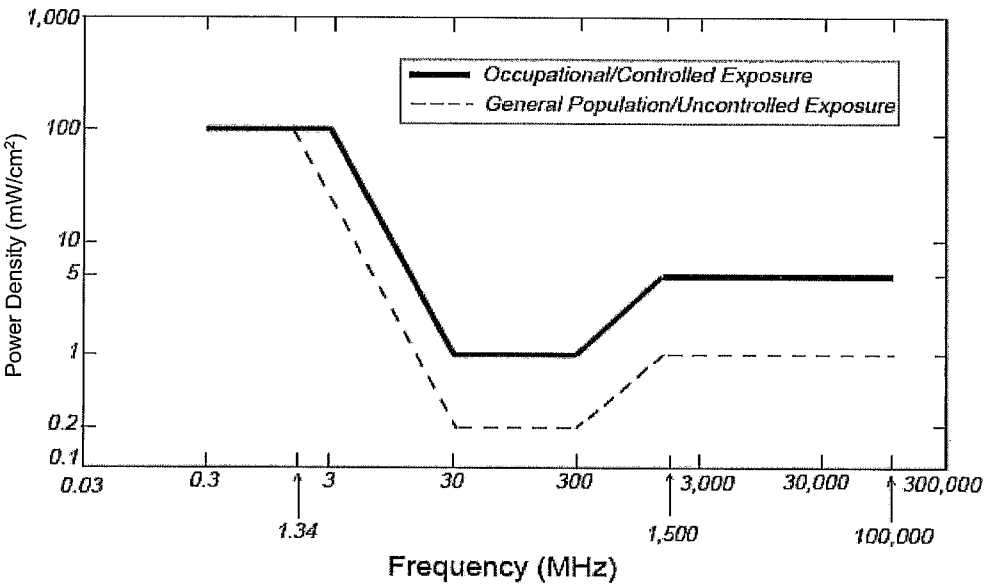
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	($900/f^2$)*	6
30-300	61.4	0.163	1.0	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6

(B) Limits for General Public/Uncontrolled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	$(180/f^2)$*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

f = Frequency in (MHz)
* Plane-wave equivalent power density

Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)

Plane-wave Equivalent Power Density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Microwave (Point-to-Point)	5,000 - 80,000 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Broadband Radio (BRS)	2,600 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Wireless Communication (WCS)	2,300 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Advanced Wireless (AWS)	2,100 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Cellular Telephone	870 MHz	2.90 mW/cm^2	0.58 mW/cm^2
Specialized Mobile Radio (SMR)	855 MHz	2.85 mW/cm^2	0.57 mW/cm^2
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm^2	0.47 mW/cm^2
Most Restrictive Frequency Range	30-300 MHz	1.00 mW/cm^2	0.20 mW/cm^2

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by AT&T in this area operate within a frequency range of 700-1900 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

2.0 AT&T RF EXPOSURE POLICY REQUIREMENTS

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Pursuant to this guidance, worst-case predictive modeling was performed for the site. This modeling is described below in Section 3.0. Lastly, based on the modeling and survey data, EBI has produced a Compliance Plan for this site that outlines the recommended signage and barriers. The recommended Compliance Plan for this site is described in Section 4.0.

3.0 WORST-CASE PREDICTIVE MODELING

In accordance with AT&T's RF Exposure policy, EBI performed theoretical modeling using RoofMaster™ software to estimate the worst-case power density at the site ground-level and/or nearby rooftops resulting from operation of the antennas. RoofMaster™ is a widely-used predictive modeling program that has been developed to predict RF power density values for rooftop and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. Using the computational methods set forth in Federal Communications (FCC) Office of Engineering & Technology (OET) Bulletin 65, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (OET-65), RoofMaster™ calculates predicted power density in a scalable grid based on the contributions of all RF sources characterized in the study scenario. At each grid location, the cumulative power density is expressed as a percentage of the FCC limits. Manufacturer antenna pattern data is utilized in these calculations. RoofMaster™ models consist of the Far Field model as specified in OET-65 and an implementation of the OET-65 Cylindrical Model (Sula9). The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit.

For this report, EBI utilized antenna and power data provided by AT&T and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65.

The assumptions used in the modeling are based upon information provided by AT&T and information gathered from other sources. There are no other wireless carriers with equipment installed at this site.

Based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

At the nearest walking/working surfaces to the AT&T antennas on the ground, the maximum power density generated by the AT&T antennas is approximately 0.25 percent of the FCC's general public limit (0.05 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 0.25 percent of the FCC's general public limit (0.05 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna.

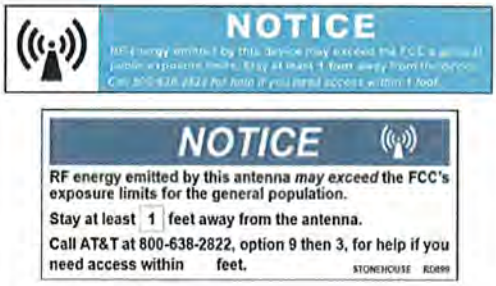
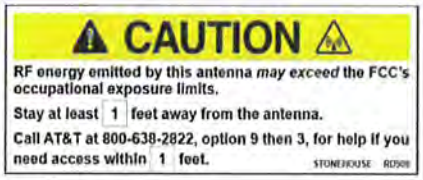
A graphical representation of the RoofMaster™ modeling results is presented in Appendix B. It should be noted that RoofMaster™ is not suitable for modeling microwave dish antennas; however, these units are designed for point-to-point operations at the elevations of the installed equipment rather than ground-level coverage. Based on AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, microwave antennas are considered compliant if they are higher than 20 feet above any accessible walking/working surface. There are no microwaves installed at this site.

4.0 RECOMMENDED SIGNAGE/COMPLIANCE PLAN

Signs are the primary means for control of access to areas where RF exposure levels may potentially exceed the MPE. As presented in the AT&T guidance document, the signs must:

- Be posted at a conspicuous point;
- Be posted at the appropriate locations;
- Be readily visible; and
- Make the reader aware of the potential risks prior to entering the affected area.

The table below presents the signs that may be used for AT&T installations.

CRAN / HETNET Small Cell Decals / Signs		Alerting Signs	
	NOTICE DECALS	 TRILINGUAL NOTICE	 NOTICE 2
	NOTICE SIGN	 CAUTION 2 – ROOFTOP	 CAUTION 2A
	CAUTION DECAL	 CAUTION 2B - TOWER	 CAUTION 2C - PARAPETS
	CAUTION SIGN	 WARNING 1B	 WARNING 2A

Based upon protocols presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, and additional guidance provided by AT&T, the following signage is recommended on the site:

- Yellow CAUTION 2B sign posted at the base of the monotree.

No barriers are required for this site.

5.0 SUMMARY AND CONCLUSIONS

EBI has prepared this Radiofrequency Emissions Compliance Report for the proposed AT&T telecommunications equipment at the site located at 4515 Santa Ross Avenue in Santa Rosa, California.

EBI has conducted theoretical modeling to estimate the worst-case power density from AT&T antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements, as well as AT&T's corporate RF safety policies. As presented in the preceding sections, based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

Signage is recommended at the site as presented in Section 4.0 and Appendix B. Posting of the signage brings the site into compliance with FCC rules and regulations and AT&T's corporate RF safety policies.

6.0 LIMITATIONS

This report was prepared for the use of AT&T Mobility, LLC to meet requirements outlined in AT&T's corporate RF safety guidelines. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information provided by the client. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

Appendix A

Personnel Certifications

Reviewed and Approved by:

REGISTERED PROFESSIONAL ENGINEER
MICHAEL A. McGUIRE
E18898
EXP. 30 SEP 21
ELECTRICAL
STATE OF CALIFORNIA

sealed 21oct2019

Michael A McGuire PE
Electrical Engineer
mike@h2dc.com

Note that EBI's scope of work is limited to an evaluation of the Radio Frequency – Electromagnetic Energy (RF-EME) field generated by the antennas and broadcast equipment noted in this report. The engineering and design of the structure, as well as the impact of the antennas and broadcast equipment on the structural integrity of the structure, are specifically excluded from EBI's scope of work.

Preparer Certification

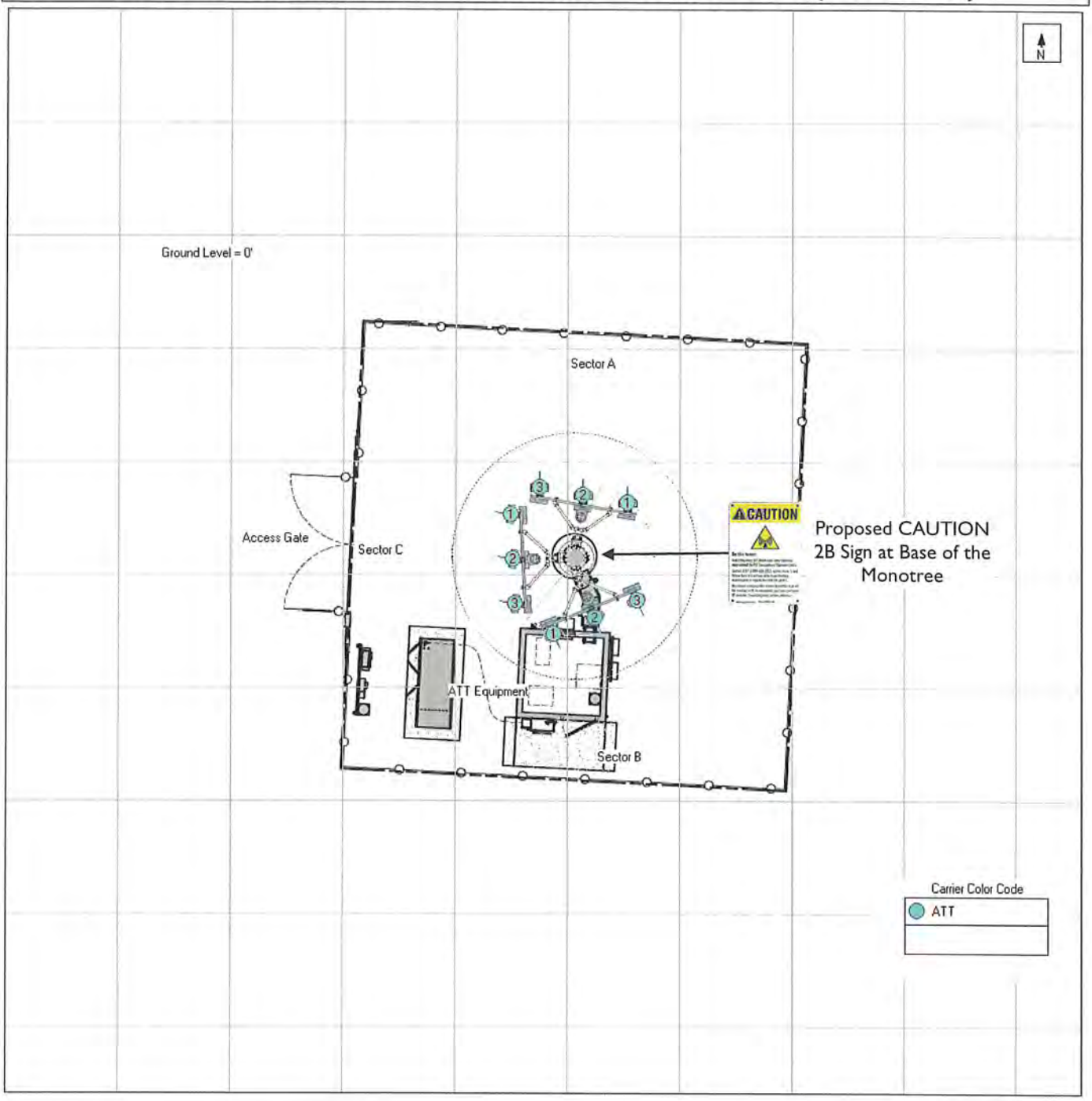
I, Erik Johnson, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am familiar with the FCC rules and regulations as well as OSHA regulations both in general and as they apply to RF-EME exposure.
- I have been trained in on the procedures outlined in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document (dated October 28, 2014) and on RF-EME modeling using RoofMaster™ modeling software.
- I have reviewed the data provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.

Appendix B

Compliance/Signage Plan

Nearest Walking Surface Simulation – Ground Level (0 feet AGL)



Existing Sign

Proposed Sign

Installed Sign

SIGN IDENTIFICATION LEGEND			
	AT&T NOTICE 2 Sign		AT&T CAUTION 2 – Rooftop Sign
	AT&T WARNING 1B and 2A Signs		AT&T CAUTION 2B – Tower Sign
	AT&T NOTICE Small Cell Signs		AT&T CAUTION 2C – Parapet Sign
	AT&T CAUTION Small Cell Signs		AT&T TRILINGUAL NOTICE Sign

DESIGN REVIEW COMMITTEE RECORD OF ACTION

May 19, 2021

ITEM NO: 2
Time: 1:35 pm
File No.: UPE19-0083

Subject: Intermediate Freestanding Commercial Telecommunications Facility
Applicant: Complete Wireless Consulting dba AT&T Mobility
Staff: Marina Herrera

Location: 4515 Santa Rosa Avenue, Santa Rosa
APN: 045-041-034 **Supervisorial District:** No. 3

Proposal: Request for formal recommendation to the BZA on the proposed preliminary design for an Intermediate Freestanding Commercial Telecommunications Facility, including three design options ranging in height from 86 feet to 96 feet, associated ground equipment located within a 1,600 square foot lease area, enclosed by a 6 foot fence, located on a ±21 acre parcel.

Zoning: DA B6 20, RC50/25 SR VOH

CEQA Review: Exempt **Final Authority:** BZA

Related Actions: DRC Preliminary - April 21, 2021

ATTENDANCE
Committee: Don McNair, Jim Henderson, Derik Michaelson
Staff: Marina Herrera
Applicant: Maria Kim
Others: n/a

REVIEW LEVEL: ☒ Preliminary ☐ Final Review ☐ Conceptual

ACTION: RECOMMEND APPROVAL

COMMENTS *

Project Design				
Site Plan:				
Architecture:				
Parking Design:				
Landscaping:				
Color/Materials:				
Signage:				
Lighting:				
Other:				

VOTE: ☒ Don McNair ☒ Jim Henderson ☒ Derik Michaelson

Ayes: 3 **Noes:** 0 **Absent:** 0 **Abstain:** 0

* Attachment

COUNTY OF SONOMA
DESIGN REVIEW COMMITTEE RECORD OF ACTION
COMMENTS / CONDITIONS

Applicant:	Complete Wireless Consulting dba AT&T Mobility	**Date:**	May 19, 2021
		File:	UPE19-0083
Address:	4515 Santa Rosa Avenue, Santa Rosa	**Action:**	RECOMMEND APPROVAL
APN:	045-041-034		

NOTE: Applicants shall submit project revisions as specified below. A written response addressing each comment is required. Responses to Final Review comments shall be confirmed by planning staff during the permitting and plan check process.

GENERAL
1. DRC recommends to the BZA approval of the mono-pine design and associated equipment cabinet and fencing as proposed

SITE PLAN
2. Recommend approval to BZA

ARCHITECTURE
3. Recommend approval to BZA

PARKING / CIRCULATION
4. n/a

LANDSCAPING
5. n/a

COLORS / MATERIALS
6. Recommend approval to BZA

LIGHTING
7. Recommend approval to BZA

SIGNAGE
8. n/a

OTHER
9. n/a

PUBLIC COMMENTS

☐ None ☒ Attached ☐ Noted:

ATTACHMENTS
1. Public comment - Balistreri, 5/19/21
2. Public comment - FirstNet, 5/17/21

From:	Marina Herrera
To:	Elaine Murillo
Subject:	FW: Request-Digital documents for Design Hearing
Date:	Wednesday, May 19, 2021 3:06:13 PM
Importance:	High

From: Juliana Balistreri <jmb.metta121@gmail.com>
Sent: Wednesday, May 19, 2021 2:37 PM
To: Marina Herrera <Marina.Herrera@sonoma-county.org>
Subject: Re: Request-Digital documents for Design Hearing

EXTERNAL

Hi Marina.

Re: UPE19-0083

Unfortunately I have another meeting and couldn't stay on the zoom.

Here is my public input:

1) If it is still possible, please co-locate the AT&T tower with the existing site that is north on Santa Rosa Ave.

2) Unless the tree is VERY natural looking, I prefer the tower design. I do not like the plain cell tower at all.

I assume the water tower will be well-designed and structural sound, with questions posed at the last meeting included and addressed.

Most of the tree towers I've looked at recently are not natural looking. They look very fake and colored and oddly shaped. For that reason, I think a presumably well-designed water tower will be more aesthetically pleasing and suitable for that spot. Clearly, a manmade structure will be there so my opinion is that a water tower would be a better option than a very fake tree or a plain metal cell tower.

Thank you for your consideration.

Juliana Balistreri
130 Firethorn Dr
Rohnert Park, CA 94928
(707) 585-2358

May 17, 2021

Design Review Committee, c/o Marina Herrera - Project Planner
Permit & Resource Management Department, Planning Division
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

RE: AT&T MOBILITY - NATIONWIDE PUBLIC SAFETY BROADBAND NETWORK NEW CELL SITE APPLICATION – Santa Rosa Ave & Hwy 101 Area

Ms. Herrera,

Under the Middle Class Tax Relief and Job Creation Act of 2012, Congress established the First Responder Network Authority (FirstNet Authority) and directed it to ensure the building, deployment, and ongoing operation of the Nationwide Public Safety Broadband Network ("FirstNet"), the first nationwide high-speed broadband network dedicated to public safety.[1] The FirstNet Authority's mission is to provide and maintain a single, interoperable platform that consistently satisfies the demanding communications needs of the public safety community in California and across the country. New radio access network ("RAN") sites are essential to the success of the program and delivering the mission critical coverage public safety needs to communicate and save lives.

This network has been a top priority for first responders and public safety agencies in California and throughout the country, and has been designed based on their specific, expressed needs, with coverage and capacity being paramount. Simply put, coverage enables a first responder to send and receive data, and capacity ensures speed and quality of those communications. New RAN infrastructure connected to FirstNet will improve communication for first responders where that infrastructure has been currently lacking. The FirstNet Authority and our private-sector partner, AT&T, have worked with the California public safety community to identify coverage needs throughout the state to improve emergency communications in everyday use as well as for large-scale emergencies, such as the recent wildfires that ravaged the state.

[1] *See* Title VI of the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96), https://www.congress.gov/112/bills/hr3630/BILLS-112hr3630enr.pdf

In December 2017, Governor Brown opted into the FirstNet Authority plan for RAN deployment in California and thus authorizing construction of the FirstNet network in areas of the state where public safety needs coverage and capacity. By opting-in, the Governor enabled public safety to rapidly access broadband services in California, while also allowing the prompt buildout and deployment of the network which began in March of 2018. His decision also directed the FirstNet Authority to take on all the risks, costs, and responsibilities associated with deploying the network in California for 25 years, and take immediate steps to make prioritized services and features available to public safety in the state.

This network not only meets the needs of Santa Rosa, Rohnert Park, and the surrounding community, but will also serve the thousands of first responders that have already adopted FirstNet in California that may respond to your next major emergency, and to the ongoing COVID-19 Pandemic. For example, as a first responder to the Kincade Fire in 2019, I relied heavily on the network for data and voice communications in this area while leading my strike team. The FirstNet Authority requests your consideration in our efforts to build new sites to achieve required coverage and capacity for our vital mission in service of public safety.

We have two Senior Public Safety Advisors assigned to California: Kevin Nida and myself. We are retired Chief Fire Officers with extensive fire service, law enforcement, and technical experience. We are available to assist you at any time. I may be reached at chris.baker@firstnet.gov or (240) 751-8027. Kevin may be reached at kevin.nida@firstnet.gov or (202) 868-7670. For your reference, attached is additional information about the FirstNet Authority and the network we were entrusted by Congress to establish.

Sincerely,

Chris Baker, J.D., P.E.
Battalion Chief-Paramedic / Investigator (Ret.)
Senior Public Safety Advisor – Northern California
First Responder Network Auhority

Attachments:

1. Primer on the FirstNet Authority's Congressional Mandate to Deploy a Nationwide Public Safety Broadband Network.

2. FirstNet Network Management-Operations Officer Letter.

333 SANTA ROSA, LLC

April 15, 2020

Design Review Committee
c/o Marina Herrera, Project Planner
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403
Marina.Herrera@sonoma-county.org

RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee hearing date April 21, 2021)

Honorable Committee Members –

I am the manager of 333 Santa Rosa LLC, the owner of the real property located at 4291 Santa Rosa Avenue, Santa Rosa, CA. Our property is the site of the existing SBA telecommunications tower that is approximately 750 feet away from the proposed project referenced above.

On February 11, 2021, I sent a letter to your Committee in which I stated that we were not interested in leasing any additional space on our property to SBA for the expansion of the existing cell site to accommodate AT&T.

Since that time, we have come to agreement with SBA on the primary terms of an amendment to our ground lease to accommodate the AT&T equipment. **We now expect to arrive at a mutually acceptable agreement on all terms within the next several weeks.** As I understand, it, once a ground lease is signed there would be no significant impediment to SBA and AT&T reaching agreement on an overall lease for the site.

In light of this, any statements made by the applicant, Complete Wireless Consulting, Inc. – whether in the original application materials or in more recent communications to the County – indicating that it would be infeasible for AT&T to co-locate its equipment on our property, do not appear to be supported.

• 3940 LAUREL CANYON BOULEVARD. STUDIO CITY. CA 91604 •
TELEPHONE: 310.204.3323 • FAX: 888.333.1968
333INVESTMENTS@GMAIL.COM

Indeed, notwithstanding any statements to the contrary in the project application, expanding the ground equipment lease area and associated construction will not displace any structures, parking or other aspects of the existing operation on the property, which is a towing company that has plenty of room for its operations. Although another carrier might require a new ground lease, the addition of equipment to the ground area or the tower would not require the removal of parking, and it would not impact business during construction. Further, the towing company's lease is expressly subject to our lease with AT&T and allows us as the property owner to freely expand the ground lease area without further consent from the tenant.

I hope that this letter clarifies our position on this project. Should you have any questions, please contact me at 310.204.3323.

Best Regards,

Andrew Geller
Manager

JOHN A. HENNING, JR.
ATTORNEY AT LAW
125 N. SWEETZER AVENUE
LOS ANGELES, CALIFORNIA 90048

TELEPHONE: (323) 655-6171
E-MAIL: jhenning@planninglawgroup.com

September 17, 2020

VIA ELECTRONIC MAIL

Marina Herrera, Project Planner
Planning Division
Permit & Resource Management Department
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa)

Dear Ms. Herrera:

I represent SBA Steel, LLC, which operates a cell tower at 4291 Santa Rosa Avenue, about 750 feet from the new AT&T cell tower proposed in the above case. Pursuant to section 26-92-040 of the Sonoma County Code, my client hereby requests a public hearing on this project before all relevant bodies of the County, including, but not limited to, the Design Review Committee, the Board of Zoning Adjustments, and the Board of Supervisors.

Although the County Code does not require a person or entity requesting a public hearing to specify any particular grounds for the request, we offer the following grounds, upon which we will elaborated prior to, and during, the public hearing(s). First, because of its unusually large size and visibility and the resulting visual and aesthetic impact, the project does not qualify for a CEQA exemption, a Negative Declaration or a Mitigated Negative Declaration. Second, because for the same reason the project would be controversial and detrimental to properties and residents in the vicinity. Third, for the same reason the project would contribute incrementally to a significant environmental impact on visual and aesthetic resources in the local region.

Thank you for your kind consideration of our request.

Very truly yours,

John A. Henning, Jr.

From: John A. Henning, Jr.
To: Marina Herrera
Subject: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa)
Date: Thursday, September 17, 2020 12:39:20 PM
Attachments: Letter Henning to Herrera re UPE-19-0083 4515 Santa Rosa 9-17-20.pdf

---

EXTERNAL

Ms. Herrera –

I represent SBA Steel, LLC, which operates a cell tower at 4291 Santa Rosa Avenue, about 750 feet from the new AT&T cell tower proposed in the above case. We understand that you are the case planner for this project.

First, I would like to inquire about the status of this project. Would you be available to discuss this by telephone in the near future?

Second, how might we arrange to make a copy of the City's file in this case? Is a Public Records Act request necessary, or may we do this through some other more informal means?

Third, please place me on your mailing list for any public notices relating to this project.

Fourth, I understand from my client that you are considering waiving the requirement for a public hearing for the project. Presumably any waiver would be pursuant to Sonoma County Code section 26-92-040. Would you please advise whether you have sent out a public notice stating your intention to waive the public hearing as required by this code section, and if so, would you kindly send a copy of the notice to me? If not, then would you please advise whether you intend to send out such a notice?

Fifth, in the event that you have already sent a notice proposing to waive the hearing, or if you believe that no such notice is necessary, please consider the letter attached to this email to be a formal written and signed request for a public hearing on the project.

Thank you for your help.

Best,

John Henning

John A. Henning, Jr.
Attorney at Law
125 N. Sweetzer Ave. Unit 202
Los Angeles, CA 90048

Ph. (323) 655-6171
Fax (323) 655-6109
jhenning@planninglawgroup.com

JOHN A. HENNING, JR.
ATTORNEY AT LAW
125 N. SWEETZER AVENUE
LOS ANGELES, CALIFORNIA 90048

TELEPHONE: (323) 655-6171
E-MAIL: jhenning@planninglawgroup.com

October 19, 2020

LETTER TO DESIGN REVIEW COMMITTEE OPPOSING PROJECT

VIA ELECTRONIC MAIL

Design Review Committee
c/o Marina Herrera, Project Planner
Permit & Resource Management Department, Planning Division
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee hearing October 21, 2020)

Honorable Committee Members:

I represent SBA Steel, LLC, which operates a cell tower at 4291 Santa Rosa Avenue, about 750 feet northwest of the new AT&T cell tower proposed in the above case. My client opposes this project because of its adverse impacts on aesthetics, the environment and neighboring properties, and because a visually intrusive tower is not needed in the first place: AT&T can obtain the coverage it needs easily, promptly and cost-effectively by simply co-locating its equipment on the existing SBA tower, with some relatively minor alterations.

A. This is a Highly Obtrusive Structure in a Heavily Traveled, Scenic Area.

The applicant originally proposed a 96-foot tall "monopine," a type of disguised tower that resembles a pine tree but which in this case looked something like a bottle brush. By the time the proposal reached the Design Review Committee, it had morphed into two alternatives: (1) an 86-foot tall, undisguised "monopole"; and (2) an 88 to 89 foot faux "water tank" design. Either would be an enormous structure – as tall as a 9-story building and one of the tallest structures in the County. The "water tank" design would be perhaps 20 feet wide.

The proposed tower is in a highly visible location. It would be just 82 feet from Santa Rosa Avenue; about 200 feet from the Santa Rosa Avenue exit of Highway 101; and 300 to 400 feet from the driving lanes of Highway 101. Highway 101 is heavily traveled: In 2017, along

this segment there were 127,100 trips on the average day, and 9,900 trips per hour at peak hour. (See https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-101.) In its staff report, staff notes: "Per the County's Visual Assessment Guidelines, the project site's sensitivity is characterized as high, as it will be highly visible from Highway 101, a designated Scenic Corridor [under the Sonoma County General Plan], in addition to the project site's designation as a Community Separator."

The project parcel and surrounding parcels are almost completely flat, with Sonoma Mountain in the distance. Other than power poles, there are no existing structures and no vegetation higher than 30 feet in the immediate vicinity. Nor does the applicant propose any new vegetation that would camouflage the tower. In other words, from all four sides there is not a single thing that would draw the viewer's eye away from the tower.

B. The Applicant's Simulations Are From Points Far, Far Away From the Site.

The applicant has presented the City with four simulations of the two designs. These simulations are based upon view perspectives between 600 feet and 2,600 feet from the site.

Applicant's Simulation Key Map

Meanwhile, the applicant simply ignores view perspectives from several major public roads and a public nature trail –points that are much closer to the proposed tower, and from which the tower would be much more visible.

The applicant's viewpoints – and especially the significant distances of these viewpoints from the tower site – seem intentionally calculated to downplay the imposing nature of the proposed tower:

1. **Applicant's Viewpoint #1** is about 900 feet to the south, on Roberts Lake Road. Northbound travelers on Roberts Lake Road will approach the tower with a wholly unobstructed view from approximately this point. However, after passing this point, travelers will then gradually approach the tower with a continuously unobstructed, almost head-on view, and they will finally pass by the tower at a distance of less than 100 feet. Yet the applicant has prepared no simulations of other viewpoints from Roberts Lake Road.

Applicant's Viewpoint #1 (monopole)
(Roberts Lake Road, ~900 feet south of site)

2. **Applicant's Viewpoint #2** is about 600 feet to the northwest, on Santa Rosa Avenue. From about this point, southbound travelers on Santa Rosa Avenue will gradually approach the tower with their view of the tower only partially obstructed by low trees and overhead power lines. However, like northbound travelers, southbound travelers will experience an increasingly imposing structure, and finally will pass by it at a distance of less than 100 feet. Yet the applicant has prepared no other simulations from Santa Rosa Avenue.

Applicant's Viewpoint #2 (monopole)
(Santa Rosa Avenue, ~600 feet northwest of site)

3. **Applicant's Viewpoint #3** is about 2,600 feet to the northeast, in a remote portion of Horn Avenue. From this distance, the tower is barely visible. Yet to the immediate northeast of the site there is a nature trail, the North Rohnert Park Trail, which runs along a canal maintained by the Sonoma County Water Agency. The trail begins just 100 feet north of the tower site and runs about 1.5 miles to the east. Pedestrians using this nature trail would have an unobstructed view of the tower, especially on the portions to the northeast of the site. Yet the applicant has prepared no simulation of any viewpoint from North Rohnert Park Trail.

Applicant's Viewpoint #3 (monopole)
(Horn Avenue, ~2,600 feet northeast of site)

4. **Applicant's Viewpoint #4** is about 1,100 feet to the southwest, on Millbrae Avenue, which is on the other side of Highway 101 from the site. This view looks across Highway 101 toward the proposed tower. Meanwhile, Highway 101 itself is only 300 to 400 feet from the site and is traveled by tens of thousands of people each day. Further, the Santa Rosa Avenue off-ramp from northbound Highway 101 is only about 200 feet from the site. Yet the applicant has prepared no simulation from any viewpoint along Highway 101 or from the Santa Rosa Avenue off-ramp.

Applicant's Viewpoint #4 (monopole)
(Milbrae Avenue, ~1,100 feet southwest of site)

As evidenced by Viewpoints #3 and #4, the applicant apparently believes there is value in performing simulations from view perspectives 1,100 and 2,600 feet away. If so, then why did the applicant ignore public perspectives such as the streets in the large residential subdivision just 1,400 feet away to the southeast, or from Roberts Lake Park, a city park in the city of Rohnert Park, which is just 1,100 feet away to the south? The answer is obvious: The applicant wanted to simulate views that downplay the project's adverse impacts, and to ignore the rest.

C. <u>The Attached Simulations by SBA's Expert Tell the Real Story</u>.

Although it is not SBA's burden to prepare simulations for the applicant, in order to cut to the chase SBA has hired its own simulation expert to prepare simulations of the project from four perspectives: Three along Roberts Lake Road (at 200 feet, 250 feet and 600 feet awaye); and one from the northbound side of Highway 101, at about 300 feet away. These four simulations, which are attached as Exhibit 1, tell the story: Regardless of design, the tower would subject tens of thousands of people each day to an enormous and imposing new structure.

SBA expert's Viewpoint #1 (monopole)
(Roberts Lake Road, ~200 feet south of site)

SBA expert's Viewpoint #2 (monopole)
(Roberts Lake Road, ~250 feet south of site)

SBA expert's Viewpoint #3 (monopole)

(Roberts Lake Road, ~600 feet south of site)

SBA expert's Viewpoint #4 (monopole)

(Highway 101 North, ~300 feet west of site)

D. <u>The Applicant Should Do Additional Simulations From North Rohnert Park Trail</u>.

Just 100 feet north of the tower site is a public nature trail called North Rohnert Park Trail, which runs along a canal operated by the Sonoma County Water Agency. The trail runs from Roberts Lake Road, east approximately 1.5 miles to Snyder Lane. Other than low brush and vegetation, there are no obstructions along the trail that would block views of the proposed tower.

The "Visual Assessment Guidelines" prepared by the County's Permit and Resource Management Department (January 2019) are Attachment 4 to the staff report. They state: "Project impacts will be analyzed by considering public viewing points. <u>Public viewing points include public roads, public trails, and public parks</u>." Here, the applicant has performed <u>no simulations whatsoever from North Rohnert Park Trail</u>. In fact, the application acts as though the trail does not exist. Yet the users of a public trail of this type deserve special consideration in any review of the project. Whether it is an undisguised 86-foot tall tower or an 88-foot tall faux "water tank," the project will forever alter the experience of using this nature trail.

N. Rohnert Park Trail, 100 feet north of site

Entrance to N. Rohnert Park Trail, looking east

View toward site from N. Rohnert Park Trail

E. <u>The Committee Should Not Approve a "Water Tower" Design Without Reviewing Detailed Design Drawings</u>.

During the application process, the applicant submitted detailed plans to the City for two designs: (1) The 86-foot tall undisguised "monopole" and (2) a 96-foot tall disguised "monopine" design. During the application process, two additional designs were considered: (3) a faux "windmill" design and (4) a faux "water tank" design. However, the applicant has not submitted any plans to the City for the windmill or the water tank designs. Only photo simulations have been provided to the City.

Now, the applicant is proceeding to the Design Review Committee with the monopole design and a faux "water tank" alternative.

As with the monopole design, the photo simulations for the "water tank" design all use viewpoints at least 600 feet away. Because of intervening vegetation, these views are all at least partially obstructed, especially at the base of the tower. Further, because AT&T failed to prepare any simulations for viewpoints closer than 600 feet to the site, the simulations provide no close-up view of the water tank design, much less a complete image of the proposed design.

The photo simulations alone are far short of what is necessary for the Committee to review the water tank alternative. The Committee should not approve an 88-foot tall, 20-foot wide structure of any kind, even preliminarily, without a full set of design drawings. Instead, if the Committee is inclined to consider such a design at all, it should require the applicant to provide detailed design drawings before it acts on the project.

F. <u>A "Water Tank" Design Would be a Visually Jarring Addition to the Landscape.</u>

Although there are no design drawings for the alternative "water tank" design and the photo simulations provide only part of the picture, it is clear that the design would involve construction of a cylindrical barrel-shaped structure, perhaps 20 feet in wide, with walls and a roof, supported by legs. At 88 feet, it would be the equivalent of 9 stories in height. The structure might also be lit from below.

Initially, it should be noted that an actual 88-foot tall water tank would not be allowed by the County zoning ordinance without a height variance. The fact that in this case what appears to be a "water tank" is actually a telecommunications tower does not change the need for the tank structure to comply with the zoning ordinance. Therefore, a variance is required.

Even if the faux "water tower" could be permitted as a cell tower without a variance, it should not be. Such a structure would be a massive and stark intrusion in the middle of a scenic vista interfering with views of Sonoma Mountain. Moreover, there is little evidence to suggest that passersby would actually be fooled into believing that the structure is actually a water tank at all. First, there are no design drawings that would help the Committee decide whether the

structure would look like "actual" water towers. Second, the applicant has provided no evidence to the City that water tanks of a similar height and design are already common in this area; without such evidence, it should be assumed that they are not.

Finally, even if the City were to conclude that a faux water tank was an acceptable intrusion into the built environment, it would be extremely difficult for the City to ensure that this remains true in the long term. A "water tank" is a structure with walls, a roof, and lighting, all of which must be constantly maintained. In this punishing environment, characterized by constant sun, heat and high winds, the maintenance of an unmanned 88-foot tall structure could become a major headache. Further, without detailed conditions providing for maintenance by the owner – and strictly mandating removal of the structure if it falls into disrepair – the faux water tank could have severe long-term negative effects on the aesthetics of the area.

The applicant prepared four simulations of the water tank design. Viewpoint #1, taken from Roberts Lake Road 900 feet to the south, is the one that best shows the design.

Applicant's Viewpoint #1 (water tank)
(Roberts Lake Road, ~900 feet from site)

As with the alternative monopole design, the obtrusiveness of the water tank design is disguised by the applicant's selective simulations, all of which were taken at viewpoints distant from the tower site. In order to do an "apples-to-apples" comparison of the two designs, SBA had its simulation expert prepare simulations of the water tank design (or as much as is known about that design at this point) from the same four perspectives: Three along Roberts Lake Road (at 200 feet, 250 feet and 600 feet); and one from the northbound side of Highway 101, at about 300 feet. These four simulations, which are attached as Exhibit 2, show that the water tower design, too, would subject tens of thousands of people each day to an enormous and imposing new structure.

VIEW 4 | ROUTE 101 NORTHBOUND, APPROXIMATELY 300 FEET WEST OF PROJECT SITE

SBA expert's Viewpoint #4 (water tank)
(Highway 101 North, ~300 feet from site)

G. <u>The Public Hearing Should Be Continued Until Plans Are Submitted for the Water Tank Design and Proper Simulations Are Done For Both Designs.</u>

Without design drawings for the water tank and proper simulations for both designs, the public is unable to meaningfully review the project, and the Design Review Committee is unable to make an informed decision. If the Committee does not reject the project outright, at a minimum it should continue the public hearing and require the applicant to submit plans for the water tank design and then either review SBA's simulations and confirm their accuracy, or prepare their own simulations from these or similarly proximate locations.

H. <u>The Public Hearing Should be Continued Until the Applicant Performs a Visual Analysis That Conforms With the City's Zoning Ordinance</u>.

In addition to lacking the proper plans and simulations, the Design Review Committee cannot perform its duties here because the applicant has not performed a proper "visual analysis" as required specifically for projects in the "SR" zoning district under section 26-64-040 of the Sonoma County Municipal Code. That section, which is included in Attachment 5 to the staff report, states that in the SR district:

> (c) A freestanding commercial telecommunication facility may be considered subject to the following additional criteria:
> …
> (4) A visual analysis, which may include photo montage, field mock up, or other techniques, shall be prepared by or on behalf of the applicant which identifies the potential visual impacts, at design capacity, of the proposed facility and its feasible alternatives. <u>Consideration shall be given to views from public areas as well as from private residences, but shall focus on preservation of scenic resources</u>. The analysis shall <u>assess the cumulative impacts of the proposed facility and other existing and foreseeable telecommunication facilities</u>, and shall identify and include all feasible mitigation measures consistent with the technological requirements of the proposed telecommunication service.

The application omits important public views from Highway 101 and the North Rohnert Park Trail, and thereby ignores the scenic resources that are experienced from these views. As such, it is impossible for the Committee to determine how best to preserve those resources.

In addition, the application makes no attempt to "assess the cumulative impacts of the proposed tower and other existing and foreseeable telecommunications facilities," and specifically the existing undisguised telecommunications tower owned by SBA and located just 750 feet to the north, a "monopine" tower at 4291 Santa Rosa Avenue that is readily visible from Santa Rosa Avenue.

If the Committee does not reject the project outright, at a minimum it should continue the public hearing and require the applicant to prepare a proper visual analysis conforming to S.C.M.C. section 26-64-040.

I. The Best Design Alternative is No Project at All: AT&T Can Easily Obtain the Coverage it Needs by Co-Locating on the Nearby SBA Tower.

By this application, AT&T is attempting to fill a gap in its coverage area. It would prefer to do this with its own tower. Accordingly, AT&T wants this Committee to believe that the project is inevitable and the only question is which form the project should take – whether monopole, water tank or another design. However, given the undisputed negative aesthetic impacts of a new 86 to 89 foot tall tower in this location, and the lack of options to mitigate those impacts, this Commission can, and should, approve no project at all.

What will happen if the project is denied outright? AT&T will achieve its service objectives by what is commonly known as "co-location," i.e., by putting its equipment on someone else's existing tower. Here, AT&T can easily locate its equipment on the existing cell tower owned by SBA at 4291 Santa Rosa Avenue, which is about 750 feet away.

AT&T site is ~750 feet from existing SBA tower
at 4291 Santa Rosa Avenue

The SBA tower presently has a tenant, but it can accommodate all of the proposed AT&T equipment and at the same height, with minimal modifications, all of which can be authorized pursuant to a simple modification of SBA's conditional use permit. The modifications would include: (1) an extension of between 5 and 10 feet in height (from the present 77 feet to between 82 and 87 feet total height); (2) a modest expansion of the ground footprint to accommodate AT&T's equipment; and (3) increase of panel antennas from six to nine.

If AT&T were to co-locate on the SBA tower, it would be pursuant to a lease with SBA. Such leases are standard procedure: AT&T presently leases towers from SBA all over the nation and in many locations in California. In fact, in just the last 18 months, AT&T has signed 39 new leases with SBA, generally using the same form lease.

The County requires AT&T to analyze alternative means of achieving its coverage objectives. In an attempt to satisfy this requirement, the applicant makes various statements in the application materials about the SBA tower, and finally concludes that co-location on the SBA tower is "infeasible" for technical reasons. In its "Alternative Sites Analysis" filed with the application, AT&T puts the SBA tower in the category of "ELIMINATED DUE TO NON-RESPONSE FROM PROPERTY OWNER(S)". (See Alternative Sites Analysis, pg. 7.) Inexplicably, the analysis goes on to state:

> "There is currently a 77' tall SBA tower, stealthed as a monopine, located at this parcel. The available centerline on this monopine is 63' and would provide less coverage than the proposed facility." (Alternative Sites Analysis, pg. 7.)

The analysis goes on to present two coverage maps, showing that placement of equipment at 63 feet (rather than the proposed project's proposed 82 feet) would provide somewhat less coverage.

It is true that the SBA tower is currently 77 feet tall, and that the available position on the tower is at about 63 feet. It is also true that this height would provide less coverage than the proposed facility, although as AT&T's own coverage maps themselves show this is only by a small margin and not sufficient to justify rejecting the SBA site out of hand.

However, the Alternative Sites Analysis then strays into the realm of mythology when it states:

> "Lastly, the current wireless equipment sits behind a fenced enclosure at the base of the existing monopine. However, the existing compound cannot accommodate another carrier's equipment and would require removal of parking or another ground lease area on the parcel, which would greatly impact business during construction. Furthermore, the property owner is unwilling to allow AT&T to use up parking spots in order to expand the ground equipment lease area." (Alternative Sites Analysis, pg. 9.)

These assertions are simply wrong, and AT&T would know this if it had ever bothered to contact SBA before filing its application, or any time thereafter.

As is readily apparent from the aerial view of the property where the SBA tower is located, the existing compound – occupied by a towing company – is a completely paved parcel in excess of one acre in size. As such, it has ample room to accommodate additional equipment at the ground level. There is no basis at all for AT&T's contention that additional equipment at ground level "would require removal of parking or another ground lease area on the parcel," or that such additional equipment "would greatly impact business during construction." Indeed, since AT&T does not cite to any particular source for this information, it is presumably just speculation.

Meanwhile, SBA has communicated with the lessor for its tower, and has been assured that the present lease can be easily modified to allow for the additional equipment AT&T requires at the ground level.

Finally, the applicant's contention that "the property owner is unwilling to allow AT&T to use up parking spots in order to expand the ground equipment lease area" is not attributed to any particular communication with any particular person, and it directly contradicts SBA's own communications with its leaseholder.

In case there is any question about these matters, on October 5, 2020, soon after learning that this application was advancing through the City's approval process, SBA's marketing manager, Markella Markouizos, called her contacts at both AT&T and the applicant, Complete Wireless Consulting, Inc., and offered to immediately commence discussions about co-locating. She has not yet heard back from them, but as the saying goes, "hope springs eternal." Perhaps the Design Review Committee can encourage AT&T to return Ms. Markouizos' calls.

J. <u>The Design Review Committee Has the Discretion to Simply Deny the Project.</u>

The Design Review Committee is not merely an advisory body; it has the discretion and the authority to approve or deny projects outright. (S.C.M.C. section Sec. 26C-294(a)-(b) ("No permit shall be issued for any project requiring design review approval unless and until drawings and plans have been approved by the design review committee or other applicable decision making body as the case may be. . . . The . . . committee . . . shall be responsible for and shall have the authority to approve drawings and plans within the meaning of this section.") The Committee's decisions, whether approving or denying a project, are appealable to the Planning Commission. (S.C.M.C. section Sec. 26C-294(e).)

The Committee is entitled to deny a project outright when it does not meet the legal standard that governs such decisions. (S.C.M.C. section Sec. 26C-294(b) ("The committee . . . shall endeavor to provide that the architectural and general appearance of buildings or structures and grounds are <u>in keeping with the character of the neighborhood</u> and are <u>not detrimental to the</u>

orderly and harmonious development of the county and do not impair the desirability of investment or occupation in the neighborhood.")

A new 86 to 89 foot tall cell tower just 82 feet from Santa Rosa Avenue and just 300 feet from Highway 101 – whether it is an undisguised "monopole" or a purportedly disguised "water tank" – is simply not "in keeping with the character" of this rural and scenic neighborhood. Such a tower is also "detrimental to the orderly and harmonious development of the county," and it does "impair the desirability of investment or occupation in the neighborhood."

For any or all of these reasons, the Design Review Committee can, and should, deny this project outright.

K. AT&T Will Commence Co-Location Negotiations With SBA Once it Gets the Message That the County is Unlikely to Approve the Project.

The present application falls neatly into a recent pattern, and it will be resolved in a predictable way if the County simply conducts a searching review of the application and sends the message to AT&T that it doesn't want a duplicative cell tower in this area.

Unfortunately for municipalities who seek to minimize the number of new cell towers, AT&T has embarked on a strategy all across the country in which it proposes new towers very close to existing SBA towers, even when SBA can easily accommodate AT&T's equipment. AT&T's apparent goal is to avoid the expense of leases with SBA.

In California and elsewhere, SBA has recently begun appearing in these proceedings to oppose the proposed new AT&T towers. The grounds for SBA's opposition are typically that (a) the project will have unmitigatable adverse aesthetic impacts, and (b) the applicable local ordinance encourages (or even requires) AT&T to co-locate on a nearby available tower rather than build a duplicative new tower.

What happens in these cases? AT&T invariably argues to the city or county staff and decisionmakers that it is "infeasible" to co-locate on the SBA tower, citing to various ambiguous (or outright untrue) reasons. The city or county decisionmakers then learn that SBA is willing – and, in fact, quite eager – to lease its facility to AT&T. Once this fact gets out in the open, staff and/or the decisionmaking bodies generally begin to express reluctance to approve the project. Eventually, AT&T faces up to this reluctance, and gives in and begins lease negotiations with SBA to locate on its tower.

In the last several months this exact pattern has played out in four California cities:

(1) Desert Hot Springs
(2) Dana Point
(3) Tehachapi
(4) Palm Desert

In the first three of these cities, before the planning commission could even act on the project AT&T either withdrew its application or put it on hold to allow for negotiations with SBA about leasing its nearby tower. In the fourth instance – Palm Desert – AT&T took its application all the way to the City Council, which voted to deny the project. Just hours before the City Council was scheduled to adopt findings supporting the denial, AT&T withdrew its application. This happened just a few days ago, on October 15, 2020. Once the dust settles in Palm Desert, SBA fully anticipates that AT&T will commence negotiations there as well. It has no other option, after all.

The County here faces precisely the same situation as these other cities. If it approves this project, it will have two duplicative towers just 750 feet apart. If it denies the project – or if it merely sends a firm message that the project is likely to be denied – AT&T will go to its "Plan B," which is to negotiate with SBA to lease its existing tower.

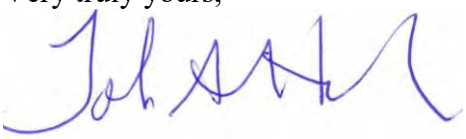
If the County decisionmakers – including this Committee – stand their ground, the residents of the County will be the winners. They will end up with the same cell coverage they would have had from a new freestanding tower, but with one less tall, unsightly and intrusive industrial structure in an otherwise scenic area.

L. <u>Conclusion.</u>

We ask that your Committee <u>deny the project</u> or, at a minimum, require the applicant to prepare additional simulations, studies and design drawings before taking action.

Thank you for your kind consideration of our comments on this project.

Very truly yours,



John A. Henning, Jr.

Enclosures:

Exhibit 1 (SBA expert's simulations 1 through 4 (monopole design)
Exhibit 2 (SBA expert's simulations 1 through 4 (water tank design)

<u>EXHIBIT A</u>:

SBA expert's simulations 1 through 4 (monopole design)

M SQUARED WIRELESS
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SAN CLEMENTE CA 92673 (949) 391-6824

CCL06387

4515 SANTA ROSA AVENUE, SANTA ROSA, CA 95407

ROBERTS LAKE ROAD, APPROXIMATELY 200 FEET SOUTH OF PROJECT SITE SANTA ROSA, CA 95407

LOCATION

@2016 Google Maps

EXISTING

PROPOSED

VIEW 1 | ROBERTS LAKE ROAD, APPROXIMATELY 200 FEET SOUTH OF PROJECT SITE

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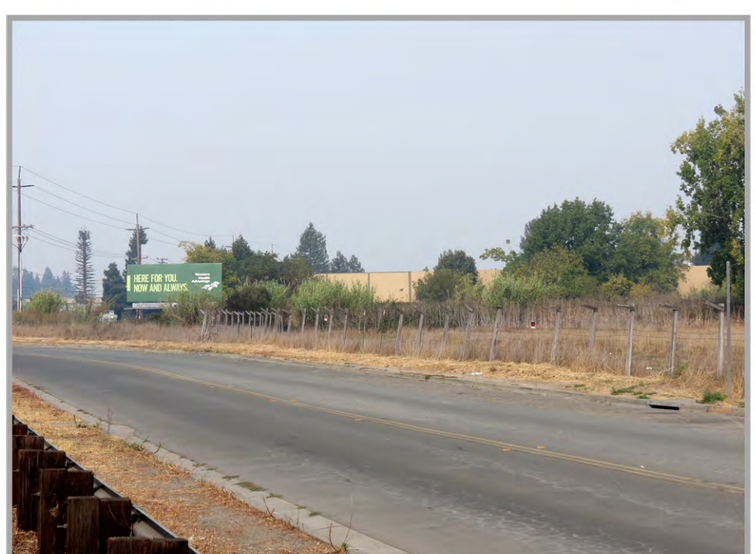
CCL06387

4515 SANTA ROSA AVENUE, SANTA ROSA, CA 95407

ROBERTS LAKE ROAD, APPROXIMATELY 250 FEET SOUTH OF PROJECT SITE SANTA ROSA, CA 95407

LOCATION

@2016 Google Maps



EXISTING

PROPOSED

VIEW 2 | ROBERTS LAKE ROAD, APPROXIMATELY 250 FEET SOUTH OF PROJECT SITE

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ROBERTS LAKE ROAD, APPROXIMATELY 600 FEET SOUTH OF PROJECT SITE SANTA ROSA, CA 95407

LOCATION

@2016 Google Maps

EXISTING

PROPOSED

VIEW 3 | ROBERTS LAKE ROAD, APPROXIMATELY 600 FEET SOUTH OF PROJECT SITE

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ROUTE 101 NORTHBOUND, APPROXIMATELY 300 FEET WEST OF PROJECT SITE SANTA ROSA, CA 95407

LOCATION

@2016 Google Maps

EXISTING

PROPOSED

VIEW 4 | ROUTE 101 NORTHBOUND, APPROXIMATELY 300 FEET WEST OF PROJECT SITE

<u>EXHIBIT B</u>:

SBA expert's simulations 1 through 4

(water tank design)

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LOCATION

@2016 Google Maps

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ROUTE 101 NORTHBOUND, APPROXIMATELY 300 FEET WEST OF PROJECT SITE

LOCATION

@2016 Google Maps

EXISTING

PROPOSED

VIEW 4 | ROUTE 101 NORTHBOUND, APPROXIMATELY 300 FEET WEST OF PROJECT SITE

333 SANTA ROSA, LLC

February 11, 2021

VIA USPS PRIORITY MAIL

Design Review Committee **VIA E-MAIL: DesignReview@sonoma-county.org**
c/o Marina Herrera, Project Planner **VIA E-MAIL: Marina.Herrera@sonoma-county.org**
Permit & Resource Management Department **VIA USPS PRIORITY MAIL**
Planning Division
2550 Ventura Avenue
Santa Rosa, CA 95403

RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee hearing October 21,2020)

Honorable Committee Members:

I represent 333 Santa Rosa LLC, the owner of the real property located at 4291 Santa Rosa Avenue, Santa Rosa, CA. We have been approached by SBA Steel, LLC to inquire whether we are interested in expanding the existing leased premises of their existing cell site. We have carefully evaluated SBA's proposal and **we are NOT interested** in leasing any additional space to SBA for the expansion of the existing cell site to accommodate AT&T.

As you are likely already aware, T-Mobile has an existing cell site located at 4000 S. Moorland Avenue across Hwy 101 from the subject SBA cell site on our property. Sprint is the only tenant on the cell site located on our property. In April of 2020, T-Mobile and Sprint merged and the merged company has announced the decommissioning of tens of thousands of cell sites. We believe T-Mobile has a more favorable lease at the Moorland Avenue site and thus, it is all but certain that the new T-Mobile/Sprint will terminate its license agreement with SBA as it is a redundant site. The net result of such termination by Sprint will lead to a take-down of the SBA site and offset the addition of the AT&T site in the area.

As a local land owner, we have no issue with AT&T's proposed cell tower at 4515 Santa Rosa Avenue. If you have any questions or require any additional information, please do not hesitate to contact me.

Best Regards,

Andy Geller
Managing Member

• 3940 LAUREL CANYON BOULEVARD. STUDIO CITY. CA 91604 •
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333INVESTMENTS@GMAIL.COM

RESPONSE TO LETTER IN OPPOSITION
AT&T MOBILITY

Site Name: CCL06387 Santa Rosa Ave & Hwy 101
Location: 4515 Santa Rosa Avenue, Santa Rosa, CA 95407
APN: 045-041-034

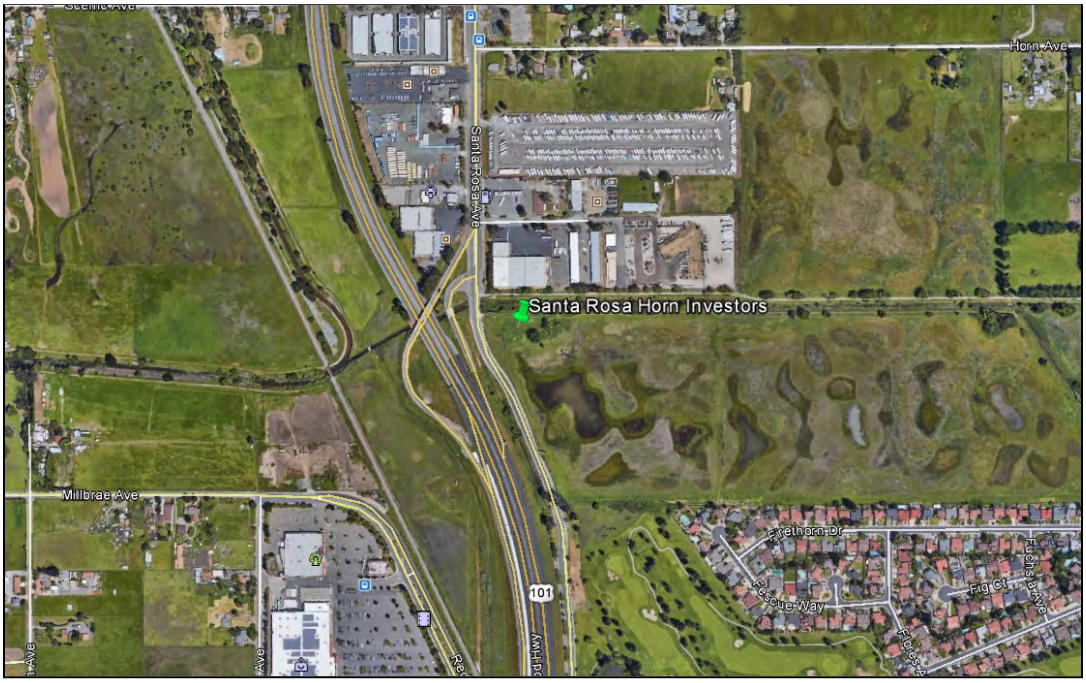
Introduction

AT&T Mobility is seeking to improve communications service to residences, businesses, public services, and area travelers in the unincorporated area north of Rohnert Park in Sonoma County, California along Highway 101. AT&T maintains a strong customer base in Sonoma County and strives to improve coverage for both existing and potential customers. The proposed facility is needed to bring improved wireless communication capacity and coverage. This project will expand AT&T's existing network and improve call quality, signal strength, and wireless connection services in Sonoma County. The improved wireless service will benefit residents, travelers, public services, and roadway safety in the area.

Public Benefits of Improved Wireless Service

Modern life has become increasingly dependent upon wireless communications. Wireless access is critical to many facets of everyday life, such as safety, recreation, and commerce. This site will allow current and future AT&T customers to have access to wireless services in the areas shown on the coverage areas identified in this application. Additionally, this site will serve as a backup to the existing landline service in the area and will provide improved wireless communication, which is essential to first responders, community safety, local businesses and area residents. As a backup system to traditional landline phone service, mobile phones have proven to be extremely important during natural disasters and other catastrophes. As more users move away from landline service and require use within their homes, the need and demand for wireless service grows every year, which in turn, require facilities to be placed closer to residences to meet that demand.

Aerial View of Proposed Site



Proposed Location
The proposed facility is located within the jurisdiction of Sonoma County at APN 045-041-034. Sonoma County has a dedicated wireless ordinance at Section 26-88-130 of the Sonoma County Zoning Code. This parcel is zoned DA (Diverse Agriculture) and wireless facilities are an allowable use within this zoning district.

The height limit for wireless telecommunications facilities is minimum functioning height. Setbacks are 55' from the centerline of the public road, 10' sides, and 20' rear in the DA zone and the tower must be setback 110% of its height from the nearest off-site dwelling. The proposed facility complies with all County requirements.

No Feasible Alternative Site
In the Letter to Design Review Committee Opposing the Project, by SBA Steel, LLC, dated October 19, 2020, SBA suggested the proposed facility was unnecessary as AT&T could co-locate on its tower located at 4291 Santa Rosa Avenue. AT&T engaged SBA in November 2020 and submitted a co-location application. The application was processed on December 15, 2020. However, since that time, SBA has been unable to acquire additional space or confirm the ground landlord is amenable to an expansion of the existing lease area. SBA's representative stated the ground landlord has gone "radio silent." Additionally, the estimated rent proposed by SBA is $3,900 per month. This greatly exceeds the average area rent of $2,800 and SBA could not provide confirmation that the ground landlord would accept its portion of that rental amount. AT&T has spent 4 months attempting to negotiate with SBA. Based on this unsuccessful endeavor, AT&T reiterates its position that there are no feasible alternative sites to the proposed location.

Proposed Design
AT&T is proposing an 86' tall monopole with an antenna centerline of 82'. Details of the site layout include: 9 new antennas at a centerline of 82' (3 sectors with 3 antennas per sector) within a 40' x 40' compound for AT&T's associated equipment and diesel generator. Power, telco, and access are all located within the owner's parcel or public right of way. The public right of way is Santa Rosa Avenue (or Hwy 101), which is roughly 84' from the beginning of the proposed lease area.

At the request of Sonoma County Planning, multiple alternative designs were proposed for consideration, including a faux-pine tree (monopine), a faux-water tank, a faux-windmill, and a monopole. Upon County's review, the monopole was recommended as the least intrusive design.

The facility complies with all Sonoma County code requirements.

Need for Facility
AT&T Mobility (AT&T) seeks to improve wireless communication services in Sonoma County along Highway 101 with the addition of a new wireless telecommunications facility. Presently, this area of Sonoma County suffers from poor wireless coverage and low capacity levels, which can cause recurring lost calls and ineffective service. The need for this proposed facility is due to complaints from AT&T Mobility customers, business, and travelers in this area. To remedy these

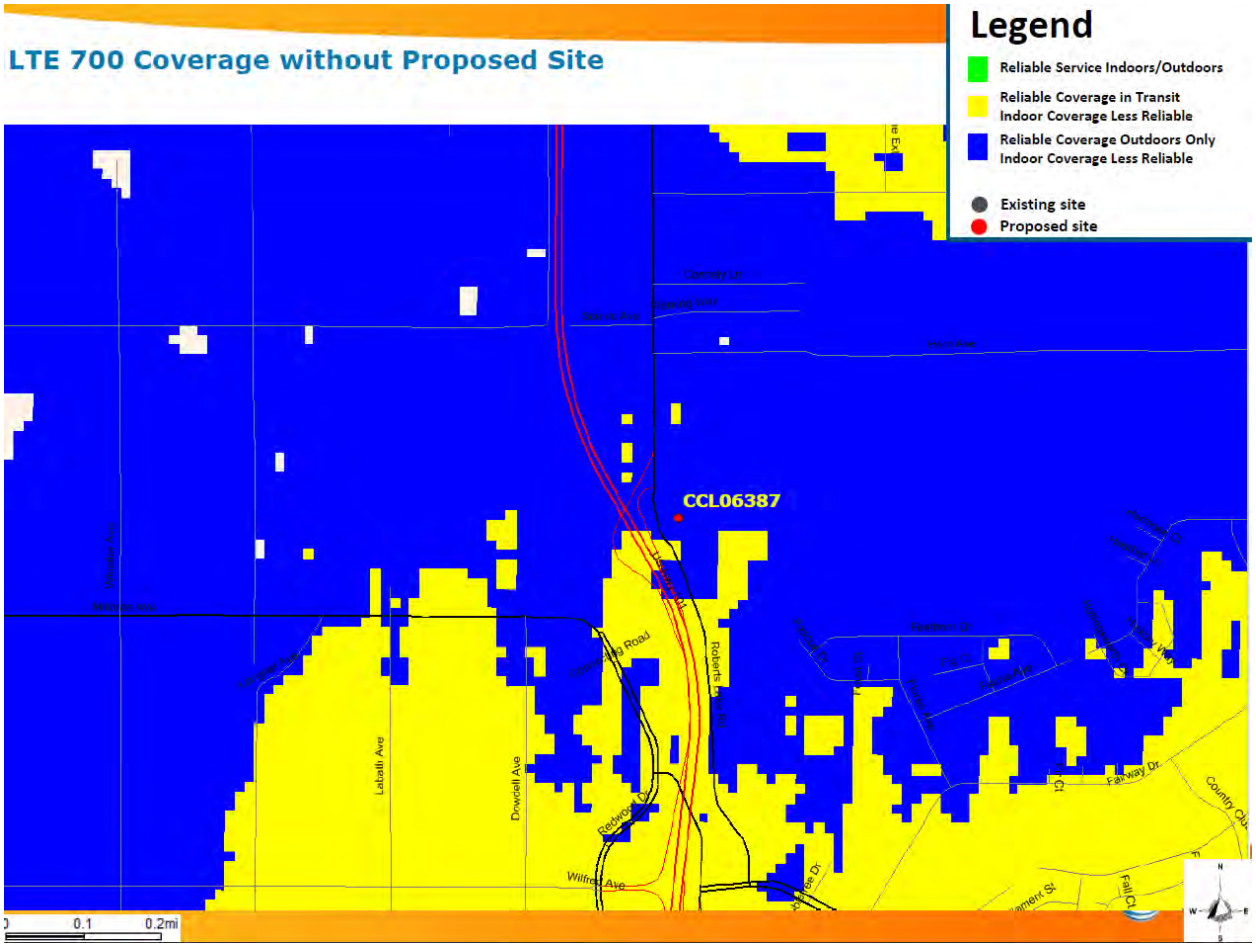
problems, AT&T proposes this new tower which will improve service to AT&T subscribers and emergency services around the new facility upon activation.

AT&T Mobility has determined that a significant gap in coverage exists in Sonoma County north of Rohnert Park. To remedy this gap, the proposed facility will bring expanded coverage and enable those who live and travel through this area to enjoy the benefits of improved wireless service. The proposed facility will improve coverage for about a 1-mile stretch of Highway 101. This facility will fill a significant coverage gap between existing AT&T Mobility facilities and will ensure uninterrupted voice and data services in the newly covered areas.

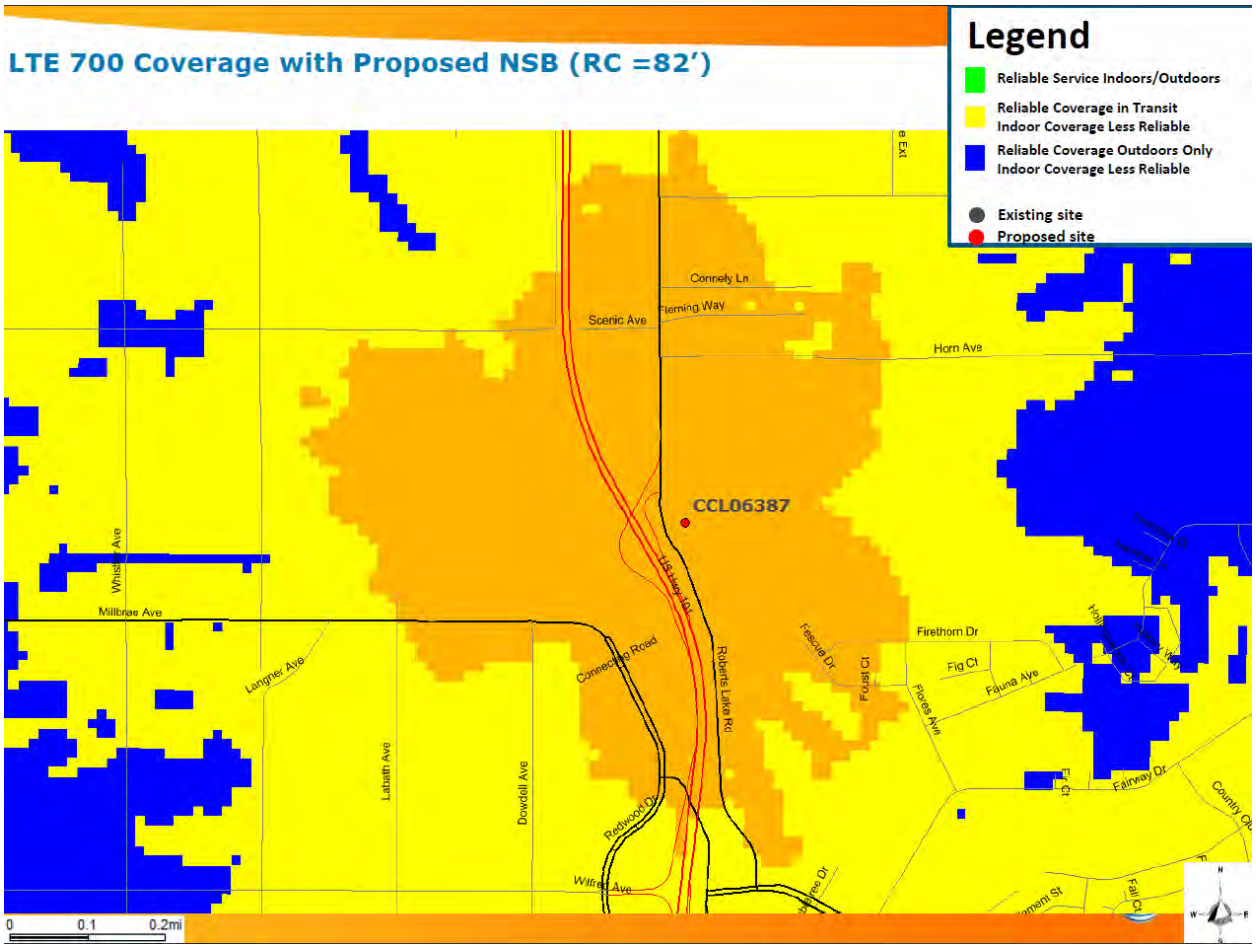
Coverage Area

Below, please see the comparison of the two coverage maps. The first map shows the target area currently lacking wireless coverage on the AT&T Wireless network. The second map shows what the coverage will be like upon activation of the proposed facility. The area shown in blue shows inadequate outdoor and indoor coverage, the area marked in yellow shows some indoor coverage and good outdoor coverage, and the area marked in green indicates good indoor, in-car, and outdoor coverage. Please note that much of the blue and yellow areas are replaced by green following activation of the proposed facility.

Existing Coverage



Proposed Coverage



Compliance with County Development Requirements

The proposed facility is the result of a thorough site selection process. There are several factors that contribute to the overall project design, including local zoning regulations, construction methods, topography, the AT&T Mobility network objectives, and a willing landlord. This facility is appropriately sited because it complies with the standards set forth by the Sonoma County Municipal Code as well as applicable state and federal standards.

In accordance with Sonoma County Municipal Code section 26C-12, an "'intermediate facility' means such facility which involves a combination of towers and antennas greater than forty feet (40′) and less than or equal to one hundred thirty feet (130′) in height." The proposed AT&T facility is 86' tall monopole. Nine antennas will be located at a centerline of 82'. All associated ground equipment will be placed within a fenced compound and will not be accessible by the public. Here, the proposed AT&T facility has been classified and discussed as an intermediate facility.

Regarding stealthing for the facility, AT&T is willing to provide alternative designs. As previously requested by Sonoma County and due to the industrial nature of the area, AT&T proceeded forward with a monopole design. A faux-pine tree (monopine) and faux-water tank

was originally proposed with AT&T's application. Proceeding forward, AT&T is submitting the monopole and faux-water tank for Sonoma County's design consideration.

Response to Request for Additional Photo Simulations
Within the Letter to Design Review Committee Opposing the Project, by SBA Steel, LLC, dated October 19, 2020, there are 4 additional photo simulations that were created that do not appropriately depict AT&T's proposed facility as the photos taken are telescoped in, which then disproportionately illustrates the tower without any context of the surrounding tall vegetation, the existing utility lines, and the industrial nature of this section of Roberts Lake Road (U.S. 101).

In response to SBA Steel's 4 views, AT&T's photo simulation vendor has provided a letter to delineate its methodology and assert its commitment to production of accurate simulations that provide the proper visual context to allow for a thorough review by Sonoma County Planning staff, Design Review Committee, and the Board of Zoning Adjustments.

Furthermore, AT&T has accurately produced photo simulations from the above 4 viewpoints on U.S. 101, identified by SBA. As shown in the Aerial Shot Map below, these simulations are shown in Viewpoints #5 through #8.

Aerial Map of Additional Photo Simulation Viewpoints

AdvanceSim
Photo Simulation Solutions
Contact (925) 202-8507

Shot Point Map

Viewpoint #5 Approximately 200' from U.S. 101

Viewpoint #6 Approximately 250' South of Site along U.S. 101

Viewpoint #7 Approximately 600' South of Site along U.S. 101

Viewpoint #8 Approximately 300' West of Site along U.S. 101

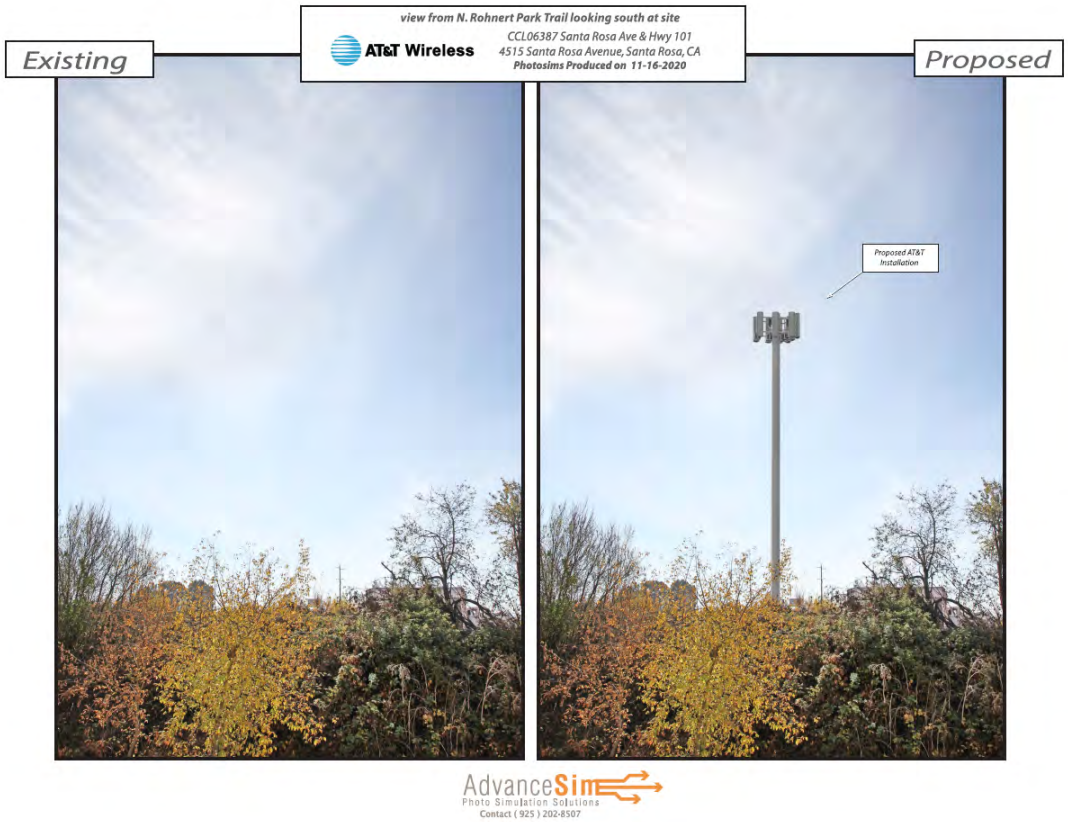
In addition to the four views from U.S. 101, AT&T has also provided four additional photo simulations from North Rohnert Park Trail, which runs along the northern property line, to address all views of the proposed facility from the public trail. These simulations are shown in Viewpoints #9, # 10, # 11, and #16.

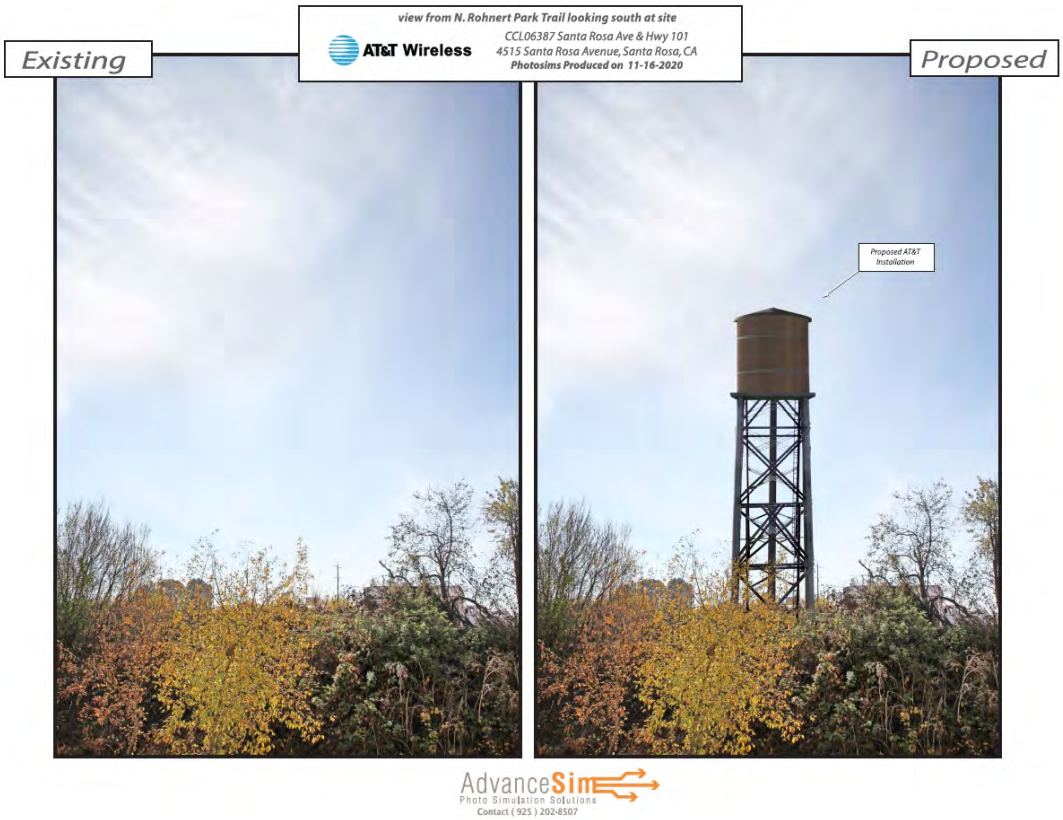
Viewpoint #11 Approximately 0.5 Miles to the East

Viewpoint #10 Approximately 1,000' to the East

Viewpoint #9 Approximately 400' to the East

Viewpoint #16 Approximately 100' North





A final packet of photo simulations with all 16 viewpoints of both the monopole and faux-water tank have been provided in full as part of AT&T's resubmittal of materials.

ADDITIONAL INFORMATION FROM THE APPLICANT

Safety Benefits of Improved Wireless Service

AT&T offers its customers multiple services such as voice calls, text messaging, mobile email, picture/video messaging, mobile web, navigation, broadband access, V CAST, and E911 services. Mobile phone use has become an extremely important tool for first responders and serves as a back-up system in the event of a natural disaster.

Operations & Maintenance

The site is unmanned and requires no on-site personnel. Visitation to the site by a service technician for routine maintenance may occur up to once per week. The proposed site is entirely self-monitored and connected electronically to a central office where sophisticated computers alert personnel to any equipment malfunction. Because the wireless facility is unmanned, there are no regular hours of operation and no impacts to existing local traffic patterns. No water or sanitation services will be required.

Compliance with FCC Standards

AT&T Mobility complies with all FCC rules governing construction requirements, technical standards, interference protection, power and height limitations and radio frequency standards. In addition, AT&T complies with all FAA rules on site location and operation.

Notice of Actions Affecting This Development Permit

In accordance with California Government Code Section 65945(a), AT&T Mobility requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818.

MONCHAMP MELDRUM LLP

Via email Marina.Herrera@sonoma-county.org

March 26, 2021

Marina Herrera
Planning Division, Sonoma County Permit & Resource Management Department
2550 Ventura Ave
Santa Rosa, CA 95403

Re: AT&T Proposed Facility at 4515 Santa Rosa Avenue, Sonoma County file, UPE19-0083

Dear Ms. Herrera,

Monchamp Meldrum LLP represents AT&T Mobility ("AT&T") in its application to construct a new Intermediate Freestanding Commercial Telecommunication Facility ("Project") at 4515 Santa Rosa Avenue in the unincorporated area of the County of Sonoma ("County"). This memorandum addresses legal issues raised in SBA Steel, LLC ("SBA") correspondence dated September 17, 2020 and October 19, 2020. Technical issues related to simulations and cell coverage will be addressed under a separate AT&T response. As explained in detail below, the Project qualifies for a Class 3 CEQA exemption and does not require a variance. Additionally, the SBA site is not a feasible alternative site as evidenced by SBA's failure to productively negotiate with AT&T.

The Project Qualifies for a Class 3 CEQA Exemption

SBA contends that the Project does not qualify for a CEQA exemption "because of its unusually large size and visibility and the resulting visual and aesthetic impact." SBA cites no statutes, regulations or case law to support its contention. As explained below, the Project fits squarely within the Class 3 categorical exemption under the CEQA Guidelines, which applies to the construction, installation, or conversion of a limited number of small facilities, structures or equipment. 14 California Code of Regulations § 15303. Further, the Project does not trigger any of the exceptions to the exemptions found in CEQA Guidelines Section 15300.2.

In *Don't Cell Our Parks v. City of San Diego/Verizon*, the 4th District Court of Appeal affirmed the Class 3 exemption applies to new wireless poles. 21 Cal.App.5th 338 (2018). The court's discussion is short and straightforward:

> "Here, applying the plain language of Guidelines section 15303, the Project consists of the construction and location of a new small facility or structure, which qualifies for a Class 3 exemption. The Projection is a new small facility that will be 534 square feet, including the above-ground branch diameter of the faux tree. While none of the examples of the exemption are directly applicable (*ante*, fn. 9), the Project is much smaller than a single-family residence, store, motel, office or restaurant. Accordingly, we hold that as a matter of law, the Project falls within the scope of the Class 3 categorical exemptions under the Guidelines."

Id. at 360. The court disagreed the site that was within a park constituted an "unusual circumstance," and noted that the City had allowed other similar facilities in parks and found the site would not cause a significant environmental impact. The Project is likewise exempt. Lastly, the Project does not trigger any of the exceptions to the exemptions found in CEQA Guidelines Section 15300.2.

<u>The Project Does Not Require A Variance</u>

SBA further contends that, since the Project may utilize a faux water tower design, the Project would require a variance from the County because "an actual 88-foot tall water tank would not be allowed by the County zoning ordinance without a height variance." SBA does not cite to any County Code sections to support its contention.

The County's zoning regulations are based on use, not appearances. The County Code has specific regulations for telecommunications facilities that prevail over more general building regulations. County Code §§ 26-64-040, 26-88-130. The Project site's base zoning, Diverse Agriculture (DA), refers to the County's telecommunication facilities regulations for maximum heights. County Code § 26-08-030(d)(2). For other structures within DA zoning, maximum building height is 35' except that ag buildings and structures may reach up to 50'. County Code § 26-08-030(d)(1). Additional height may be permitted if site plan approval goes through design review. *Id*. So, a proposed 88-foot tall water tower would go through the design review process, as the Project is doing.

<u>There Is Not a Feasible Alternative Site</u>

Finally, SBA argues the Project is unnecessary because AT&T could co-locate on its tower located at 4291 Santa Rosa Avenue. SBA states it "has communicated with the lessor for its tower, and has been assured that the present lease can be easily modified." SBA further requests AT&T contact its marketing manager, Markella Markouizos to discuss co-location. Based on these representations, AT&T engaged SBA in November 2020 and submitted a co-location application. However, in direct opposition to its representations to the Design Review Committee, SBA has been unable to acquire additional space or confirm the ground landlord is amenable to an expansion of the existing lease area. Ms. Markouizos had stated the ground landlord has gone "radio silent" until a few week when some communication regarding a "large payment" was suggested by the landlord. After such statement, the landlord has again become non-respondent. Additionally, the estimated rent proposed by SBA is a substantial increase

over both the rent for the proposed site as well as market rents. AT&T has spent over four months attempting to negotiate with SBA and has no basis upon which to think an agreement is possible given the landlord's lack of responsiveness and indication of costs. Based on this unsuccessful endeavor, AT&T reiterates its position that there are no feasible alternative sites to the proposed location.

Conclusion

As analyzed above, the Project qualifies for a Class 3 CEQA exemption and does not require a variance. The SBA site is not a feasible alternative site because SBA was unable to provide a firm and reasonable rental proposal within a reasonable amount of time. The SBA correspondence does not raise any viable legal arguments that would impede the County from approving the Project.

Sincerely,

Amanda Monchamp

Cc:
Scott Orr, Planning Director, Sonoma County
Robert Pittman, County Counsel, Sonoma County
John di Bene, AT&T, Assistant Vice President, Senior Legal Counsel, AT&T

From:	John A. Henning, Jr.
To:	Marina Herrera
Subject:	RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)
Date:	Wednesday, April 14, 2021 2:21:30 PM

EXTERNAL

Marina –

I just saw that you posted an agenda report for this item. Have you seen my email below? I would still like to (a) talk to you and (b) get my hands on the communications and other documents that have come in since the hearing last fall.

Best,

John Henning

John A. Henning, Jr.
Attorney at Law
125 N. Sweetzer Ave. Unit 202
Los Angeles, CA 90048

Ph. (323) 655-6171
Fax (323) 655-6109
jhenning@planninglawgroup.com

From: John A. Henning, Jr. [mailto:jhenning@planninglawgroup.com]
Sent: Friday, April 09, 2021 5:17 PM
To: 'Marina Herrera'
Subject: RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

Marina –

I just received a courtesy notice from your office saying that this case has been set for DRC on April 21. This came as a surprise because AT&T's site acquisition vendor, Complete Wireless, has been negotiating with SBA to co-locate on the existing nearby tower and they are in the final stages of the process, perhaps just a few weeks from signing a lease. Complete Wireless has said nothing to SBA indicating that it was preparing to pursue the new tower location while the co-location process was underway.

We understand why AT&T might wish to keep its application for the new tower on file until the co-location process has been successfully concluded. However, it makes no sense for AT&T to be

pushing its application through the County approval process at the same time as it is pursuing co-location on the SBA tower – especially given how close the two companies are to an agreement.

Can I schedule a time to call you to discuss this sometime on Tuesday, April 13? I'll be traveling on the Monday the 12th.

In the meantime, would you please advise: (a) whether staff supports the application; (b) when your staff report will be ready; and (c) how I can get the file for the project, including any resubmittals, communications, etc., since the last hearing in October 2020.

If the hearing goes forward on April 21, we will of course be opposing the project. At a minimum, we feel that a continuance of the April 12, 2021 DRC hearing is in order, to allow sufficient time for the co-location process to come to a successful conclusion.

In case it is helpful to you, I'd like to get you up to date on the co-location discussions. Here is where things stand:

- On December 14, 2020, AT&T submitted a formal application for co-location to SBA, in accordance with SBA's internal policy. AT&T applied for a 65 foot level for the RAD arrays on a structure 77 feet tall, which requires no additional height on the structure but does require a new array below the existing array at 75 feet, plus additional ground space for the AT&T equipment. These two changes apparently will require an amendment or modification to the CUP.

- After receiving the application in December, SBA then entered into negotiations with its ground lessor for an amendment to the ground lease that would accommodate the AT&T equipment. The negotiations with the ground lessor took several months. During that time SBA was in regular communication with Rocky Cordova of Complete Wireless about the status.

- About a week ago, on April 2, 2021, SBA and the ground lessor finally agreed to the key terms of a ground lease amendment. That same day, April 2, SBA advised Mr. Cordova of this fact. Then, on Monday, April 5, SBA contacted Mr. Cordova and proposed specific pricing and other terms for the overall site lease between SBA and AT&T. On Wednesday, April 7, SBA discussed these terms with Mr. Cordova.

- AT&T and SBA already have an agreed upon lease template, so the preparation of a draft site lease is relatively routine. SBA will send a draft lease to Complete Wireless in the next few days, i.e., by April 14, 2021.

- Once AT&T has approved the draft lease, SBA will then sign a ground lease amendment with the ground lessor, thereby securing the ground area. Then, SBA will sign the site lease with AT&T.

- Once AT&T and SBA have signed the site lease, the last step is for AT&T to apply for the

necessary amendments to the CUP for the SBA site, thereby allowing the expanded ground lease area and the taller structure height.

- SBA expects that the leasing process will take 4 to 6 more weeks, with the permit process to follow that.

I'm looking forward to hearing from you.

Best,

John Henning

John A. Henning, Jr.
Attorney at Law
125 N. Sweetzer Ave. Unit 202
Los Angeles, CA 90048

Ph. (323) 655-6171
Fax (323) 655-6109
jhenning@planninglawgroup.com

From: Marina Herrera [mailto:Marina.Herrera@sonoma-county.org]
Sent: Tuesday, December 08, 2020 11:30 AM
To: 'John A. Henning, Jr.'
Subject: RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

John,

Thank you for providing me with the update below, I sincerely appreciate it.
At this time I have no update to provide you with regarding this application.
The only movement which has occurred recently is an extension to the shot clock to 4/30/2021.

Marina Herrera
Planner II
www.PermitSonoma.org
County of Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-2397 |
Office: 707-565-1900 | Fax: 707-565-1103

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From: John A. Henning, Jr. <jhenning@planninglawgroup.com>
Sent: Monday, December 7, 2020 11:47 AM
To: Marina Herrera <Marina.Herrera@sonoma-county.org>
Subject: RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

EXTERNAL

Marina –

I hope that you received the message below. Would you please let me know whether there is any movement toward rescheduling this at the Design Review Committee, either from staff or from the applicant?

Best,

John

John A. Henning, Jr.
Attorney at Law
125 N. Sweetzer Ave. Unit 202
Los Angeles, CA 90048

Ph. (323) 655-6171
Fax (323) 655-6109
jhenning@planninglawgroup.com

From: John A. Henning, Jr. [mailto:jhenning@planninglawgroup.com]
Sent: Tuesday, November 17, 2020 1:29 PM
To: 'Marina Herrera'
Subject: RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

Marina –

I want to give you an update about what is going on regarding the possibility of co-locating the AT&T equipment on the existing SBA tower.

Markella Markouizos of SBA, who handles leasing in California, has recently been in discussions with AT&T about this. She expects that AT&T will be making an application to SBA to co-locate, which is the first step in SBA's leasing process and should lead to the parties arriving at mutually acceptable

terms.

We recognize that AT&T may feel that some modifications to the SBA tower (such as height or number of panels) will be necessary to accommodate the AT&T equipment. Certainly SBA will need to lease more ground space from the property owner. Either of these changes may require a modification to the existing CUP held by SBA. It is not clear to me at this point whether AT&T or SBA would handle the necessary permitting effort, but we will certainly support and cooperate in whatever is needed.

In the meantime, we thought you might be interested to know that we have talked at length with Andrew Geller, who is the principal of the property owner (an LLC) where the SBA tower is located. Mr. Geller reports that in mid-October he received a letter dated October 13, 2020, from Rocky Cordova of Complete Wireless Consulting (the applicant), in which Mr. Cordova inquired about co-location. After having some trouble reaching Mr. Cordova, on about November 3rd Mr. Geller finally spoke with Maria Kim, who is also the applicant's representative for the County application. As Mr. Geller told Ms. Kim (and notwithstanding statements made in the AT&T application), until the applicant's October 13 letter no one from AT&T or the applicant had ever contacted him or his company about the possibility of locating AT&T equipment on his property. Mr. Geller told Ms. Kim that he would certainly be willing to lease additional space either to AT&T or to SBA for AT&T's ground equipment.

Mr. Geller has also advised us that despite statements made in the application, a taller tower and/or additional ground equipment space, and any associated construction, would not significantly disrupt the existing use at the site, which is a towing company. Nor would it displace parking spaces for the towing company, whether required by the code or otherwise.

Mr. Geller may be writing to you directly about these issues in the near future, so that the record is clear.

I wonder whether the applicant has advised the County of the above facts. In any event, we assume that neither AT&T nor the applicant would want to pursue an application for a separate tower if there is a reasonable prospect that they will soon agree with SBA to co-locate on the existing tower, and that on that basis the applicant at a minimum would put the application on hold until those discussions can be completed.

Would you please let me know whether there is any movement toward rescheduling this at the Design Review Committee, either from staff or from the applicant?

Thank you for your help.

Best,

John Henning

John A. Henning, Jr.
Attorney at Law
125 N. Sweetzer Ave. Unit 202
Los Angeles, CA 90048

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Fax (323) 655-6109
jhenning@planninglawgroup.com

From: John A. Henning, Jr. [mailto:jhenning@planninglawgroup.com]
Sent: Wednesday, October 21, 2020 12:27 PM
To: 'Marina Herrera'
Subject: RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

Marina –

Thank you. I'm not surprised by this of course. I'll be ready to do a presentation nonetheless and we'll see what happens.

John

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125 N. Sweetzer Ave. Unit 202
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jhenning@planninglawgroup.com

From: Marina Herrera [mailto:Marina.Herrera@sonoma-county.org]
Sent: Wednesday, October 21, 2020 12:26 PM
To: 'John A. Henning, Jr.'
Subject: RE: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

John,

ATT has requested a continuance of this item to a date uncertain for the following reasons

pertaining to your letter, 1) ATT would like to prepare photo simulations from the public trail 2) ATT would like to provide a response to SBAs claims that the photo simulations are not accurate. Procedurally, I will request this of the Design Review Committee – they can elect to either move forward with hearing the project or continuing the item, I cannot say with any certainty what will happen this afternoon.
'See' you in the meeting.

Marina Herrera
Planner II
www.PermitSonoma.org
County of Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
Direct: 707-565-2397 |
Office: 707-565-1900 | Fax: 707-565-1103

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From: John A. Henning, Jr. <jhenning@planninglawgroup.com>
Sent: Wednesday, October 21, 2020 10:06 AM
To: Marina Herrera <Marina.Herrera@sonoma-county.org>
Subject: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee October 21, 2020)

EXTERNAL

Marina –

As the hearing approaches, if you receive any correspondence from the applicant or the public, would you mind forwarding it to me?

Thank you.

Best,

John

John A. Henning, Jr.
Attorney at Law
125 N. Sweetzer Ave. Unit 202
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E-MAIL: jhenning@planninglawgroup.com

April 21, 2021

2nd LETTER TO DESIGN REVIEW COMMITTEE OPPOSING PROJECT

VIA ELECTRONIC MAIL

Design Review Committee
c/o Marina Herrera, Project Planner
Permit & Resource Management Department, Planning Division
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Case No. UPE-19-0083 (cell tower at 4515 Santa Rosa Ave., Santa Rosa) (Design Review Committee hearing April 21, 2021, agenda item 2)

Honorable Committee Members:

I represent SBA Steel, LLC, which operates a cell tower at 4291 Santa Rosa Avenue, about 750 feet northwest of the new AT&T cell tower proposed in the above case. My client opposes this project because of its adverse impacts on aesthetics, the environment and neighboring properties, and because a visually intrusive tower is not needed in the first place: AT&T can obtain the coverage it needs easily, promptly and cost-effectively by simply co-locating its equipment on the existing SBA tower, with some relatively minor alterations.

This matter came to your Committee for hearing initially on October 19, 2020. We submitted a lengthy letter on that date which pointed out that the applicant had not prepared adequate simulations of the project from numerous perspectives, and had not made a meaningful effort to explore the possibility of co-locating its equipment on the nearby SBA tower, which would render a new tower entirely unnecessary. Rather than proceed with a hearing, the Committee – with the applicant's consent – continued the hearing to allow the applicant to respond to points made in our letter, and presumably to further explore co-location.

Now, six months later, the applicant is back with the same proposal. The applicant contends that negotiations with SBA to co-locate on the SBA tower have been unsuccessful, and implies that further negotiations would be futile. It presents additional simulations of the undisguised design and the water tank design, and asks the Committee to choose between them.

Notably, while the applicant presents the Committee with photo simulations of the new "water tank" design, it does not provide any drawings or plans, for this alternative. Accordingly, the Committee is left to evaluate this alternative based solely on photo simulations, which represent merely the opinions of the photo simulation expert and are for purposes of illustration only. If the project is eventually approved by the County, it is not simulations, but rather, the heretofore omitted drawings and plans that will be referenced in the permit and that will dictate the design of the final project.

SBA raised this in its October 19, 2020, letter to the Committee. More recently, as we understand it, the project planner advised the applicant to provide the water tower design plans to the Committee before this hearing, but the applicant declined to do so. The Design Review Committee has no obligation to proceed in its review until it has these crucial plans.

If the Committee does proceed, even the applicant's simulations are sufficient to demonstrate that the best design alternative is no tower at all. An 85-plus foot tall structure in this location – whether an undisguised "monopole" or a fake "water tank" – would be a significant intrusion into scenic vistas across the site from multiple perspectives. Meanwhile, the alternative of co-locating the AT&T equipment on the SBA tower would completely remove that intrusion. As such, co-location is effectively a third design alternative.

This third design alternative is freely available to AT&T. In the last six months, SBA and AT&T have come very close to a deal on co-location, and it now appears that a deal can feasibly be reached in a matter of weeks.

Unfortunately, while the negotiations with AT&T were underway, it appears that AT&T used a brief delay in reaching agreement as an opportunity to declare that co-location was "infeasible," and on that basis is taking its own project back to the Design Review Committee.

The Committee would upset the pending co-location deal by approving either of the applicant's designs now. Although a Design Review approval is only the first step in the County process, such an approval could easily be interpreted by AT&T as an indication that the County will eventually approve the tower. This would likely embolden AT&T to proceed with a new tower and abandon its efforts to co-locate on the SBA tower.

The Committee should reject the monopole and the water tank designs. Alternatively, if it is inclined to consider these alternatives at all, it should continue the hearing to require the applicant to present a proper Visual Assessment and a full set of plans of the water tank design.

A. While it Pursues This Project, AT&T is Inches From Reaching an Agreement to Co-Locate on the Nearby SBA Tower.

A look behind the scenes shows that co-location is not as futile as the applicant has recently asserted. In the last six months, SBA and AT&T have come very close to a deal on co-location, and it now appears that a deal can feasibly be reached in a matter of weeks.

AT&T itself initiated this process on December 14, 2020, by filing a formal application for co-location with SBA, in accordance with SBA's internal policy. After that, SBA began the process of negotiating with the owner of the land where its tower is located, in order to secure additional ground area for the AT&T equipment.

Negotiations with the ground owner took about three months, and took place in early 2021. Along the way SBA kept the applicant informed about the progress of these negotiations and how the amended ground lease would likely affect the lease pricing to be offered to AT&T. About three weeks ago, on April 2, 2021, SBA and the ground owner finally arrived at an understanding as to the primary ground lease terms. That same day, SBA notified the applicant of this fact.

Unfortunately, in February 2021, while negotiations were underway, the ground lessor became exasperated with SBA and sent a letter to the Design Review Committee in which it stated that it was not interested in amending the ground lease to accommodate AT&T. However, that letter has been effectively rescinded by a more recent letter from the ground lessor to the Committee dated April 15, 2021, in which the ground lessor emphasizes that "we have come to agreement with SBA on the primary terms of an amendment to our ground lease to accommodate the AT&T equipment. We now expect to arrive at a mutually acceptable agreement on all terms within the next several weeks."

All that remains now is paperwork. SBA will present the ground lessor with a draft lease in a few days. In the meantime, SBA has already sent a draft overall lease to AT&T based upon the template generally used by the parties at locations across the nation. If the parties are properly motivated, the process of reviewing and signing these leases can be completed in several weeks. After that, AT&T would apply for the minor modifications to the SBA conditional use permit necessary to allow the additional equipment.

B. AT&T Wants to Pay $850 Less Per Month for Co-Location, But That is Not Sufficient Justification to Saddle the County With a New 86-Foot Tower.

In case there is any question whether SBA is offering reasonable terms to AT&T, the rental rate offered in the proposed draft lease is $3,650.00 per month, with an annual escalation of 2.5%. As is typical in the industry generally (and with AT&T leases of SBA towers in particular) SBA offers an initial lease term of 5 years, which gives AT&T the option to terminate the lease any reason at the close of the initial 5 year term. In addition to this, AT&T would have four 5-year renewal options, which gives it the option to renew the lease (or not) in 5-year increments.

The applicant has recently argued that this is too much rent. In its "Response To Letter In Opposition" dated March 26, 2021, the applicant stated that the $3,900 per month being considered as of that date "greatly exceeds the average area rent of $2,800."

AT&T offers no basis for its contention as to the "average area rent" for cell towers. Moreover, the "average" rent for this area does not reflect the circumstances in this particular location. Specifically, it does not take into account the fact that SBA must pay the ground owner a substantial sum in order to secure permission to expand the ground area to accommodate AT&T.

Of course, the implication that co-location at the SBA tower is "infeasible" because this tower costs $850 per month more than the average tower in the area is absurd on its face. The rent proposed by SBA is similar to the rent for a small single family home. AT&T makes no showing that paying this amount would make the tower economically infeasible, and it is hard to imagine how it could. The County is not obligated to approve an unsightly and permanent industrial structure more than 85 feet tall simply so that AT&T – a publicly traded company worth in excess of $200 billion – can save $850 per month.

C. <u>This is a Highly Obtrusive Structure in a Heavily Traveled, Scenic Area</u>.

The applicant now proposes one of two alternatives: (1) an 86-foot tall, undisguised "monopole"; and (2) an 88 to 89 foot faux "water tank" design. Either would be an enormous structure – as tall as a 9-story building and one of the tallest structures in the County. The "water tank" design would be perhaps 20 feet wide.

The proposed tower is in a highly visible location. It would be just 82 feet from Santa Rosa Avenue; about 200 feet from the Santa Rosa Avenue exit of Highway 101; and 300 to 400 feet from the driving lanes of Highway 101. Highway 101 is heavily traveled: In 2017, along this segment there were 127,100 trips on the average day, and 9,900 trips per hour at peak hour. (See https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-101.) In its staff report, staff notes: "Per the County's Visual Assessment Guidelines, <u>the project site's sensitivity is characterized as high, as it will be highly visible from Highway 101, a designated Scenic Corridor</u> [under the Sonoma County General Plan], in addition to the project site's designation as a Community Separator." (Staff Report at pg. 2 (emphasis supplied).)

The project parcel and surrounding parcels are almost completely flat, with Sonoma Mountain in the distance. Other than power poles, there are no existing structures and no vegetation higher than 30 feet in the immediate vicinity. Nor does the applicant propose any new vegetation that would camouflage the tower. In other words, <u>from all four sides there is not a single thing that would draw the viewer's eye away from the tower</u>.

D. <u>The Applicant's Simulations and Visual Assessment are Insufficient for the Committee to Review the Project.</u>

On the eve of last October's hearing, the applicant presented the City with just four simulations of the undisguised and monopine designs. These simulations were based upon view perspectives that were 600 feet, 900 feet, 1,100 feet and 2,600 feet from the site.

Applicant's Initial Simulation Key Map

In our October 19, 2020, letter to the Committee, we criticized this cherry-picking approach to the simulations, noting that the site is readily visible from Roberts Lake Road, just 82 feet to the west; from the 101 Freeway at a distance of just 300 feet; and from the North Rohnert Park Trail, just 100 feet to the north. Wethen provided alternative simulations from more appropriate view points in these areas, prepared by SBA's simulation expert.

We also noted in our letter that the applicant had not prepared a "Visual Assessment" in conformance with the County's Visual Assessment Guidelines (January 2019). The Guidelines state: "Project impacts will be analyzed by considering public viewing points. Public viewing points include public roads, public trails, and public parks." (See October 19, 2020, staff report, Attachment 4 (emphasis supplied).)

This time around, the applicant prepared a "Visual Assessment" dated March 26, 2021, which purports to present simulations and a narrative in accordance with the Visual Assessment Guidelines. In the Visual Assessment, the applicant continues to rely on three of the original perspectives (1, 2 and 4) and omits only the farthest perspective (3) from the analysis. In addition to this, the applicant presents new simulations of three additional perspectives from the nearby Rohnert Park Trail.

However, the applicant's Visual Assessment is still a far cry from what this Committee needs to review the two alternative designs, for at least four reasons.

First, for the three original perspectives, the applicant inexplicably depicts only the monopole design; there is no simulation of the water tank design at all, and accordingly there is no narrative visual assessment of this design from those three perspectives, as required by the Visual Assessment Guidelines.

Second, for the three new perspectives from Rohnert Park Trail, the applicant inexplicably depicts only the water tank design; there is no simulation of the monopole design at all, and accordingly no narrative visual assessment of the monopole design from those three perspectives, as required by the Guidelines.

Third, for the three new perspectives, the applicant provides no map key showing where these additional perspectives are located.

Fourth, the applicant continues to ignore important view perspectives from points that are much closer to the proposed tower, and from which the tower would be much more visible. Despite staff's finding that the project is "highly visible from Highway 101, a designated Scenic Corridor," the applicant omits from the Visual Assessment any perspective from the 101 Freeway. Similarly, even though Roberts Lake Road is just 82 feet from the proposed tower, the applicant excludes any perspective from Roberts Lake Road less than 600 feet away

It is certainly true that some (though not all) of the omitted perspectives and simulations appear elsewhere in the materials recently provided to the County. However, by not bothering to incorporate these additional perspectives into its Visual Assessment, the applicant has deprived the Committee of a cohesive set of simulations, coupled with a cohesive narrative for each and every simulation, as required by the Visual Assessment Guidelines. The Committee should not proceed to evaluate the alternative designs until it has an adequate Visual Assessment.

E. The Simulations by SBA's Expert Tell the Real Story.

Although it is not SBA's burden to prepare simulations for the applicant, in order to cut to the chase SBA hired its own simulation expert to prepare simulations of the project from four perspectives: Three along Roberts Lake Road (at 200 feet, 250 feet and 600 feet away); and one from the northbound side of Highway 101, at about 300 feet away. These four simulations tell the story: Regardless of design, the tower would subject tens of thousands of people each day to an enormous and imposing new structure. These simulations were presented with our October 19, 2020, letter.

Notably, the applicant has now attempted to replicate SBA's simulations using its own photos and its own expert, and has presented the corresponding simulations to the Committee. However, the applicant does not assert that SBA's simulations are wrong. Therefore, they are properly considered by the Committee. For the monopole design, the simulations follow.

SBA expert's Viewpoint #1 (monopole)

(Roberts Lake Road, ~200 feet south of site)

SBA expert's Viewpoint #2 (monopole)

(Roberts Lake Road, ~250 feet south of site)

VIEW 3 | ROBERTS LAKE ROAD, APPROXIMATELY 600 FEET SOUTH OF PROJECT SITE

SBA expert's Viewpoint #3 (monopole)

(Roberts Lake Road, ~600 feet south of site)

VIEW 4 | ROUTE 101 NORTHBOUND, APPROXIMATELY 300 FEET WEST OF PROJECT SITE

SBA expert's Viewpoint #4 (monopole)

(Highway 101 North, ~300 feet west of site)

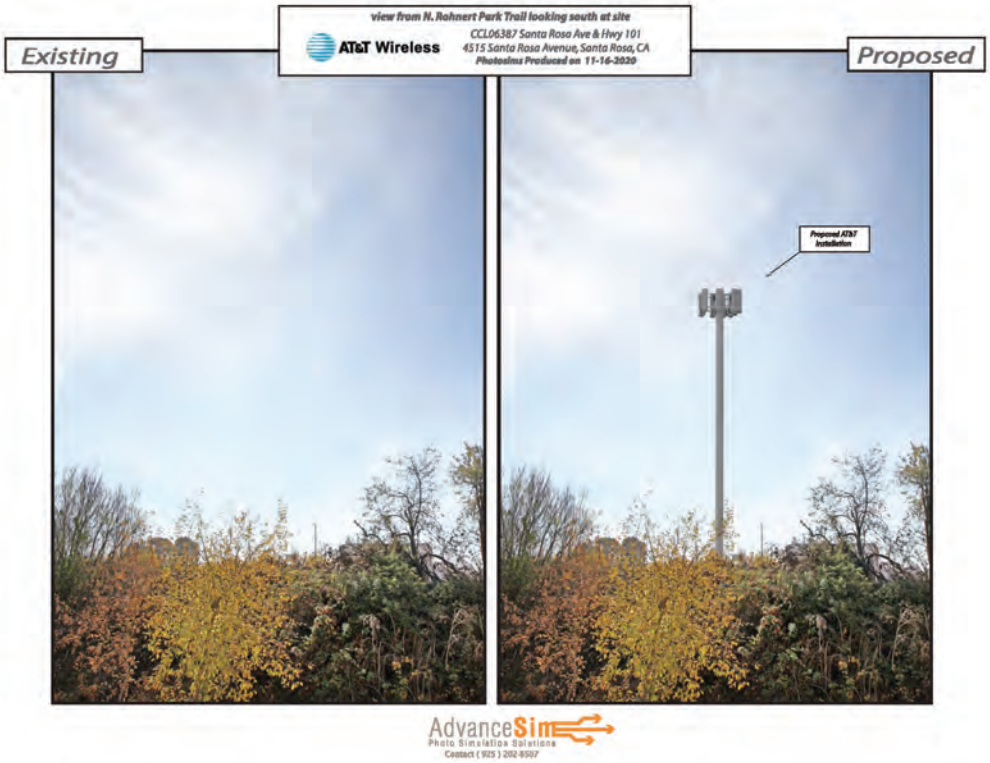
F. <u>The Committee Should Give Great Weight to the Project's Impact on Users of the North Rohnert Park Trail</u>.

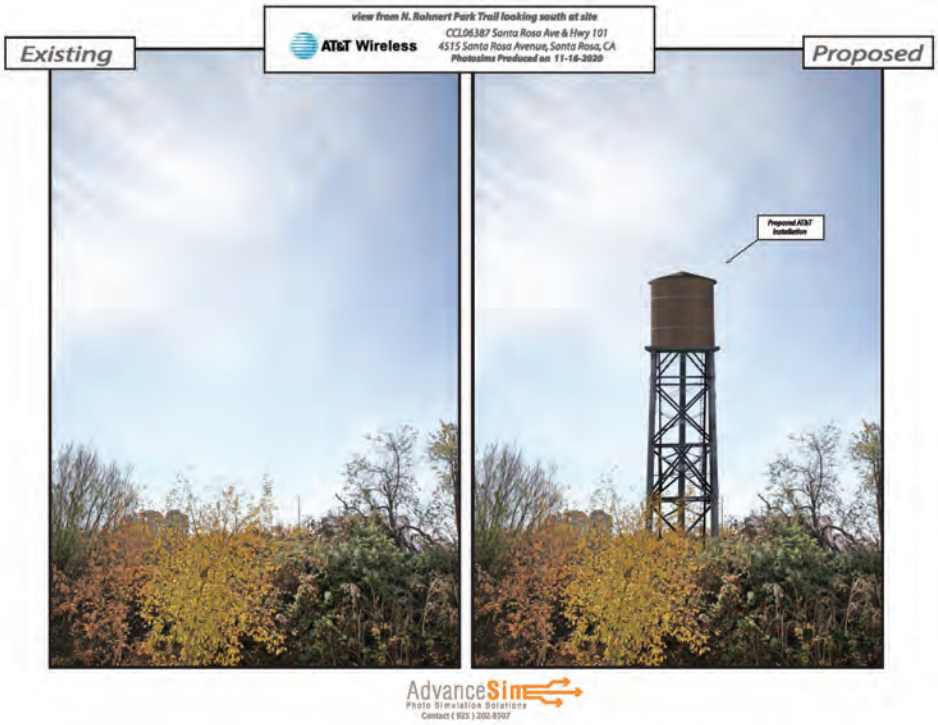
Just 100 feet north of the tower site is a public nature trail called North Rohnert Park Trail, which runs along a canal operated by the Sonoma County Water Agency. The trail runs from Roberts Lake Road, east approximately 1.5 miles to Snyder Lane. Other than low brush and vegetation, there are no obstructions along the trail that would block views of the proposed tower.

The users of a public trail of this type deserve special consideration in any review of the project. Whether it is an undisguised 86-foot tall tower or an 88-foot tall faux "water tank," the project will forever alter the experience of using this nature trail.

This time around, the applicant has finally performed simulations from Rohnert Park Trail. These simulations show the devastating effect of this project on the users of the trail.

N. Rohnert Park Trail, 100 feet north of site





Applicant simulations from Rohnert Park Trail

G. The Committee Should Not Approve a "Water Tank" Design Without Reviewing Detailed Design Drawings.

During the application process, the applicant submitted detailed plans to the City for two designs: (1) The 86-foot tall undisguised "monopole" and (2) a 96-foot tall disguised "monopine" design. During the application process, two additional designs were considered: (3) a faux "windmill" design and (4) a faux "water tank" design. However, the applicant has not submitted any plans to the City for the windmill or the water tank designs. Only photo simulations have been provided to the City for these latter two designs.

Now, the applicant is proceeding to the Design Review Committee with the monopole design and the faux "water tank" alternative.

The photo simulations alone are far short of what is necessary for the Committee to review the water tank alternative. The Committee should not approve an 88-foot tall, 20-foot wide structure of any kind, even preliminarily, without a full set of design drawings. Instead, if the Committee is inclined to consider such a design at all, it should require the applicant to provide detailed design drawings before it acts on the project.

H. A "Water Tank" Design Would be a Visually Jarring Addition to the Landscape.

The applicant's new simulations for the alternative "water tank" design demonstrate that the design would involve construction of a cylindrical barrel-shaped structure, perhaps 20 feet in wide, with walls and a roof, supported by legs. At 88 feet, it would be the equivalent of 9 stories in height. The structure might also be lit from below.

Initially, it should be noted that an actual 88-foot tall water tank would not be allowed by the County zoning ordinance without a height variance. The fact that in this case what appears to be a "water tank" is actually a telecommunications tower does not change the need for the tank structure to comply with the zoning ordinance. Therefore, a variance is required.[1]

Even if the faux "water tank" could be permitted as a cell tower without a variance, it should not be. Such a structure would be a massive and stark intrusion in the middle of a scenic vista interfering with views of Sonoma Mountain. Moreover, there is little evidence to suggest that passersby would actually be fooled into believing that the structure is actually a water tank at all. First, there are no design drawings that would help the Committee decide whether the

[1] AT&T has submitted a letter from its attorney, Amanda Monchamp of Monchamp Meldrum LLP, contending that "[t]he County's zoning regulations are based on use, not appearances," and that on that basis a fake and 88-foot tall "water tank" can be approved as a cell tower long as there is a cell tower inside. If this were the law, there would be no end to the resulting mischief. Any form of structure – no matter how elaborate, how wide or deep, or how unsightly – could be permitted virtually by right simply because it encases a cell tower. The County would face proposals not just for fake trees and fake "water tanks," but for fake buildings of all sorts. Since no variance would be required for these structures, the County would be largely powerless to stem the tide.

structure would look like "actual" water tanks. Second, the applicant has presented the Committee with no materials samples that would ensure a natural appearance. Third, the applicant has provided no evidence to the City that water tanks of a similar height and design are already common in this area; without such evidence, it should be assumed that they are not.

Finally, even if the County were to conclude that a faux water tank was an acceptable intrusion into the built environment, it would be extremely difficult for the County to ensure that this remains true in the long term. A "water tank" is a structure with walls, a roof, and lighting, all of which must be constantly maintained. In this punishing environment, characterized by constant sun, heat and high winds, the maintenance of an unmanned 88-foot tall structure could become a major headache. Further, without detailed conditions providing for maintenance by the owner – and strictly mandating removal of the structure if it falls into disrepair – the faux water tank could have severe long-term negative effects on the aesthetics of the area.

SBA prepared four simulations of the water tank design. These were included with our October 19, 2020, letter to the Committee. As with simulations of the monopole, the applicant has now attempted to replicate these simulations. However, the applicant does not contend that the SBA simulations are wrong. Both sets of simulations show that the water tower design, too, would subject tens of thousands of people each day to an enormous and imposing new structure.

SBA expert's Viewpoint #4 (water tank)
(Highway 101 North, ~300 feet from site)

I. The Public Hearing Should Be Continued Until Plans Are Submitted for the Water Tank Design and Proper Simulations Are Done For Both Designs.

Without design drawings for the water tank and proper simulations for both designs, the public is unable to meaningfully review the project, and the Design Review Committee is unable to make an informed decision. If the Committee does not reject the project outright, at a minimum it should continue the public hearing and require the applicant to submit plans for the water tank design and then either review SBA's simulations and confirm their accuracy, or prepare their own simulations from these or similarly proximate locations.

J. The Public Hearing Should be Continued Until the Applicant Performs a Visual Analysis That Conforms With the City's Zoning Ordinance.

In addition to lacking the proper plans and simulations and a proper Visual Assessment pursuant to the County's Visual Assessment Guidelines, the Design Review Committee cannot perform its duties here because the applicant has not performed a proper "visual analysis" as required specifically for projects in the "SR" zoning district under section 26-64-040 of the Sonoma County Municipal Code. That section states that in the SR district:

> (c) A freestanding commercial telecommunication facility may be considered subject to the following additional criteria:
> …
> (4) A visual analysis, which may include photo montage, field mock up, or other techniques, shall be prepared by or on behalf of the applicant which identifies the potential visual impacts, at design capacity, of the proposed facility and its feasible alternatives. Consideration shall be given to views from public areas as well as from private residences, but shall focus on preservation of scenic resources. The analysis shall assess the cumulative impacts of the proposed facility and other existing and foreseeable telecommunication facilities, and shall identify and include all feasible mitigation measures consistent with the technological requirements of the proposed telecommunication service.

As discussed above, the Visual Assessment performed by the applicant in the most recent materials is incomplete in numerous respects. Even if that document were taken together with the numerous new simulations prepared by the applicant, these materials do not meet the specific requirement in section 26-64-040 that "[t]he analysis shall assess the cumulative impacts of the proposed tower and other existing and foreseeable telecommunications facilities." Of special import in such analysis is the existing undisguised telecommunications tower owned by SBA and located just 750 feet to the north, a "monopine" tower at 4291 Santa Rosa Avenue that is readily visible from Santa Rosa Avenue.

If the Committee does not reject the project outright, at a minimum it should continue the public hearing and require the applicant to prepare a proper visual analysis conforming to S.C.M.C. section 26-64-040.

K. The Design Review Committee Has the Discretion to Simply Deny the Project.

The Design Review Committee is not merely an advisory body; it has the discretion and the authority to approve or deny projects outright. (S.C.M.C. section Sec. 26C-294(a)-(b) ("No permit shall be issued for any project requiring design review approval unless and until drawings and plans have been approved by the design review committee or other applicable decision making body as the case may be. . . . The . . . committee . . . shall be responsible for and shall have the authority to approve drawings and plans within the meaning of this section.") The Committee's decisions, whether approving or denying a project, are appealable to the Planning Commission. (S.C.M.C. section Sec. 26C-294(e).)

The Committee is entitled to deny a project outright when it does not meet the legal standard that governs such decisions. (S.C.M.C. section Sec. 26C-294(b) ("The committee . . . shall endeavor to provide that the architectural and general appearance of buildings or structures and grounds are in keeping with the character of the neighborhood and are not detrimental to the orderly and harmonious development of the county and do not impair the desirability of investment or occupation in the neighborhood.")

A new 86 to 89 foot tall cell tower just 82 feet from Santa Rosa Avenue and just 300 feet from Highway 101 – whether it is an undisguised "monopole" or a purportedly disguised "water tank" – is simply not "in keeping with the character" of this rural and scenic neighborhood. Such a tower is also "detrimental to the orderly and harmonious development of the county," and it does "impair the desirability of investment or occupation in the neighborhood."

For any or all of these reasons, the Design Review Committee can, and should, deny this project outright.

L. AT&T Will Conclude its Co-Location Negotiations With SBA Once it Gets the Message That the County is Unlikely to Approve the Project.

The present application falls neatly into a recent pattern, and it will be resolved in a predictable way if the County simply conducts a searching review of the application and sends the message to AT&T that it doesn't want a duplicative cell tower in this area.

Unfortunately for municipalities who seek to minimize the number of new cell towers, AT&T has embarked on a strategy all across the country in which it proposes new towers very close to existing SBA towers, even when SBA can easily accommodate AT&T's equipment. AT&T's apparent goal is to avoid the expense of leases with SBA.

In California and elsewhere, SBA has recently begun appearing in these proceedings to oppose the proposed new AT&T towers. The grounds for SBA's opposition are typically that (a) the project will have unmitigatable adverse aesthetic impacts, and (b) the applicable local ordinance encourages (or even requires) AT&T to co-locate on a nearby available tower rather

than build a duplicative new tower.

What happens in these cases? AT&T invariably argues to the city or county staff and decisionmakers that it is "infeasible" to co-locate on the SBA tower, citing to various ambiguous (or outright untrue) reasons. The city or county decisionmakers then learn that SBA is willing – and, in fact, quite eager – to lease its facility to AT&T. Once this fact gets out in the open, staff and/or the decisionmaking bodies generally begin to express reluctance to approve the project. Eventually, AT&T faces up to this reluctance, and gives in and begins lease negotiations with SBA to locate on its tower.

In recent months this exact pattern has played out in four California cities:

(1) Desert Hot Springs
(2) Dana Point
(3) Tehachapi
(4) Palm Desert

In the first three of these cities, before the planning commission could even act on the project AT&T either withdrew its application or put it on hold to allow for negotiations with SBA about leasing its nearby tower. In the fourth instance – Palm Desert – AT&T took its application all the way to the City Council, which voted to deny the project. Just hours before the City Council was scheduled to adopt findings supporting the denial, AT&T withdrew its application. Once the dust settles in Palm Desert, SBA fully anticipates that AT&T will commence negotiations there as well. It has no other option, after all.

The County here faces precisely the same situation as these other cities. If it approves this project, it will have two duplicative towers just 750 feet apart. If it denies the project – or if it merely sends a firm message that the project is likely to be denied – AT&T will go to its "Plan B," which is to complete negotiations with SBA to lease its existing tower.

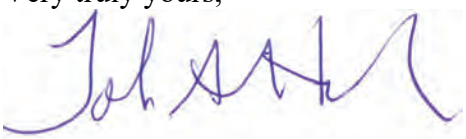
If the County decisionmakers – including this Committee – stand their ground, the residents of the County will be the winners. They will end up with the same cell coverage they would have had from a new freestanding tower, but with one less tall, unsightly and intrusive industrial structure in an otherwise scenic area.

M. <u>Conclusion.</u>

We ask that your Committee <u>deny the project</u> or, at a minimum, require the applicant to prepare additional simulations, studies and design drawings before taking action.

Thank you for your kind consideration of our comments on this project.

Very truly yours,



John A. Henning, Jr.

May 17, 2021

Design Review Committee, c/o Marina Herrera - Project Planner
Permit & Resource Management Department, Planning Division
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

RE: AT&T MOBILITY - NATIONWIDE PUBLIC SAFETY BROADBAND NETWORK NEW CELL SITE APPLICATION – Santa Rosa Ave & Hwy 101 Area

Ms. Herrera,

Under the Middle Class Tax Relief and Job Creation Act of 2012, Congress established the First Responder Network Authority (FirstNet Authority) and directed it to ensure the building, deployment, and ongoing operation of the Nationwide Public Safety Broadband Network ("FirstNet"), the first nationwide high-speed broadband network dedicated to public safety.[1] The FirstNet Authority's mission is to provide and maintain a single, interoperable platform that consistently satisfies the demanding communications needs of the public safety community in California and across the country. New radio access network ("RAN") sites are essential to the success of the program and delivering the mission critical coverage public safety needs to communicate and save lives.

This network has been a top priority for first responders and public safety agencies in California and throughout the country, and has been designed based on their specific, expressed needs, with coverage and capacity being paramount. Simply put, coverage enables a first responder to send and receive data, and capacity ensures speed and quality of those communications. New RAN infrastructure connected to FirstNet will improve communication for first responders where that infrastructure has been currently lacking. The FirstNet Authority and our private-sector partner, AT&T, have worked with the California public safety community to identify coverage needs throughout the state to improve emergency communications in everyday use as well as for large-scale emergencies, such as the recent wildfires that ravaged the state.

[1] *See* Title VI of the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96), https://www.congress.gov/112/bills/hr3630/BILLS-112hr3630enr.pdf

In December 2017, Governor Brown opted into the FirstNet Authority plan for RAN deployment in California and thus authorizing construction of the FirstNet network in areas of the state where public safety needs coverage and capacity. By opting-in, the Governor enabled public safety to rapidly access broadband services in California, while also allowing the prompt buildout and deployment of the network which began in March of 2018. His decision also directed the FirstNet Authority to take on all the risks, costs, and responsibilities associated with deploying the network in California for 25 years, and take immediate steps to make prioritized services and features available to public safety in the state.

This network not only meets the needs of Santa Rosa, Rohnert Park, and the surrounding community, but will also serve the thousands of first responders that have already adopted FirstNet in California that may respond to your next major emergency, and to the ongoing COVID-19 Pandemic. For example, as a first responder to the Kincade Fire in 2019, I relied heavily on the network for data and voice communications in this area while leading my strike team. The FirstNet Authority requests your consideration in our efforts to build new sites to achieve required coverage and capacity for our vital mission in service of public safety.

We have two Senior Public Safety Advisors assigned to California: Kevin Nida and myself. We are retired Chief Fire Officers with extensive fire service, law enforcement, and technical experience. We are available to assist you at any time. I may be reached at chris.baker@firstnet.gov or (240) 751-8027. Kevin may be reached at kevin.nida@firstnet.gov or (202) 868-7670. For your reference, attached is additional information about the FirstNet Authority and the network we were entrusted by Congress to establish.

Sincerely,

Chris Baker, J.D., P.E.
Battalion Chief-Paramedic / Investigator (Ret.)
Senior Public Safety Advisor – Northern California
First Responder Network Auhority

Attachments:

1. Primer on the FirstNet Authority's Congressional Mandate to Deploy a Nationwide Public Safety Broadband Network.

2. FirstNet Network Management-Operations Officer Letter.

- *Top 10 Frequently Asked Questions* (https://firstnet.gov/sites/default/files/TopTenFAQs_190906.pdf)

- *FirstNet: The Future of Public Safety Communications* (https://firstnet.gov/sites/default/files/Branding_the_Future_of_Public_Safety_Communications_0.pdf)

- The First Responder Network Authority (FirstNet Authority) was charged by the U.S. Congress to ensure the development, building, and maintenance of a nationwide mobile broadband network dedicated to meeting the needs of the public safety community. Over the past several years, the FirstNet Authority has made great strides toward fulfilling this purpose, including the establishment of a public-private partnership with AT&T, Inc. (AT&T) to deploy the nationwide public safety broadband network across the country and adoption of FirstNet service by hundreds of thousands of public safety professionals. As FirstNet matures and public safety reaps the benefits of a network dedicated to providing them with needed capabilities and features, the FirstNet Authority is focusing on the next stages of fulfilling its mission. The FirstNet Authority is committed to a vision where a dedicated and differentiated broadband communications experience transforms public safety operations to save lives and protect communities. This vision encapsulates the entirety of the "FirstNet Experience" from AT&T's deployment of the FirstNet network to the FirstNet Authority's value-adding activities and investments, which make FirstNet different from any other public safety communications experience. Over time, the FirstNet Authority's work will help enable public safety to communicate in new and ever more useful ways to help transform public safety operations. (*First Responder Network Authority Roadmap*, at 3, https://firstnet.gov/system/tdf/FirstNet_Roadmap.pdf?file=1&type=node&id=1055&force=0).

- *As with many bold public policy initiatives, the creation of FirstNet ensued from disaster and tragedy. Although the idea that all first responders across the United States should share one nationwide network existed prior to September 11, 2001, the events of that terrible day inspired collaborative action from public safety and Congress. As Congress directed, FirstNet is working toward the deployment of a single, interoperable platform for public safety communications that will bring dedicated priority wireless broadband services to millions of public safety personnel at the local, state, tribal, and Federal levels. . . .* Authorized by Congress in 2012, FirstNet will fulfill a fundamental need of the public safety community and is the last remaining recommendation to be addressed of the 9/11 Commission. FirstNet's mission is to ensure the deployment, and operation of a nationwide public safety broadband network (network) for public safety entities. Leveraging Long Term Evolution (LTE)5 technology standards, up to $7 billion in funding from spectrum auctions, and a nationwide license of 20 MHz of radio frequency spectrum, the FirstNet network is intended to dramatically increase the safety and capabilities of all of those who serve in a public safety capacity, and thereby further protect the American people. Public safety, and thus the American people, will benefit from the availability of a dedicated wireless broadband network prioritized for first responders, the economies of scale afforded by a

national, commercial standards-based network, and the force of innovation in applications which to date has only been enjoyed by consumers. (*2014 Annual Report to Congress*, at 1, https://firstnet.gov/system/tdf/FirstNet_Annual_Report_to_Congress-FY_2014.pdf?file=1&type=node&id=644&force=0)

- During the events of September 11, 2001 (9/11), first responders could not communicate with each other. Some radios did not work in the high-rise World Trade Center; radio channels were overloaded by the large number of responders trying to communicate; and public safety radio systems operated on various frequencies and were not interoperable. There were also non-technical issues. Officials struggled to coordinate the multi-agency response, and to maintain command and control of the numerous agencies and responders.

  The 9/11 Commission called for the "expedited and increased assignment of radio spectrum for public safety purposes." Increased spectrum would allow public safety agencies to accommodate an increasing number of users; support interoperability solutions (e.g., shared channels); and leverage new technologies (e.g., live video streams) to enhance response.

  In 2012, Congress acted on the recommendation of the 9/11 Commission. In Title VI of the Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96), Congress authorized the Federal Communications Commission (FCC) to allocate additional spectrum for public safety use; established the First Responder Network Authority (FirstNet) and authorized it to enter into a public-private partnership to build a nationwide public safety broadband network; and, provided $7 billion out of revenues from spectrum auctions to build the network….

  FirstNet has made progress in implementing the provisions in the act. In March 2017, FirstNet awarded a 25-year, $6.5 billion contract to AT&T to build and maintain the nationwide network for public safety. FirstNet provided AT&T with 20 megahertz (MHz) of broadband spectrum, which AT&T can monetize for public safety and non-public safety use. AT&T is providing FirstNet access to its infrastructure, valued at $180 billion, and $40 billion to maintain and improve the network.

  In September 2017, FirstNet/AT&T presented states with plans detailing how the network would be deployed in each state. Governors could opt to have AT&T deploy the network (i.e., opt in), or have the state assume responsibility for the deployment (i.e., opt out). By January 2018, all 50 states and 6 territories opted in. This was viewed as a victory for FirstNet, AT&T, and public safety stakeholders who had long advocated for a nationwide network for public safety. (Congressional Research Service, *The First Responder Network (FirstNet) and Next-Generation Communications for Public Safety: Issues for Congress*, April 27, 2018, https://crsreports.congress.gov/product/pdf/R/R45179)

First Responder Network Authority
12201 Sunrise Valley Drive, M/S 243 • Reston, VA 20192 • www.firstnet.gov

To Whom It May Concern,

On March 28, 2017, AT&T was awarded the federal government contract to deploy and operate the Nationwide Public Safety Broadband Network (NPSBN), following an open, transparent, and competitive procurement process—as well as consultation with state, local, tribal, and federal stakeholders—consistent with the First Responder Network Authority's (FirstNet Authority) enabling statute. The NPSBN contract between the FirstNet Authority and AT&T has a period of performance of 25 years from the date awarded.

Per the terms and conditions of the NPSBN contract, and given that all U.S. states and territories and the District of Columbia (states) opted into the FirstNet Authority plan for network deployment, AT&T is responsible for providing a comprehensive network solution to each of the states. This comprehensive network solution includes: the deployment and provisioning of a nationwide Core Network and Radio Access Network equipment and services (e.g., cell sites, backhaul, aggregation, national transport networks and operation centers); a device ecosystem; deployable capabilities; operational and business support systems; an application ecosystem; network services; integration, maintenance, and operational services; and ongoing evolution of these systems required to function fully as an operational wireless 3rd Generation Partnership Project (3GPP) standards-based Long Term Evolution (LTE) NPSBN.

The FirstNet solution provided by AT&T brings Public Safety Entities across the country a dedicated interoperable broadband network with quality of service, priority usage, and preemption. In addition, the NPSBN is physically hardened, as needed, and is resilient, secure, and highly reliable. Furthermore, the NPSBN provides to public safety agencies local control over prioritization, preemption, provisioning, and reporting.

The NPSBN and associated devices are branded as FirstNet, consistent with applicable laws and regulations. AT&T is responsible for marketing; product management; sales; distribution; customer care; communications; strategic partnership; and network deployment, operation, maintenance, and evolution. However, in accordance with its statutory duties and responsibilities, the FirstNet Authority maintains rigorous oversight of the NPSBN and AT&T's obligations under the contract.

If you have any questions with regard to this letter, please contact Kimberly Luke at Kimberly.Luke@firstnet.gov, 202-868-3683.

Sincerely,

Richard Reed

Chief Network Management and Operations Officer (CNMO)

First Responder Network Authority

From:	Marina Herrera
To:	Elaine Murillo
Subject:	FW: Request-Digital documents for Design Hearing
Date:	Wednesday, May 19, 2021 3:06:13 PM
Importance:	High

From: Juliana Balistreri <jmb.metta121@gmail.com>
Sent: Wednesday, May 19, 2021 2:37 PM
To: Marina Herrera <Marina.Herrera@sonoma-county.org>
Subject: Re: Request-Digital documents for Design Hearing

EXTERNAL

Hi Marina.

Re: UPE19-0083

Unfortunately I have another meeting and couldn't stay on the zoom.

Here is my public input:

1) If it is still possible, please co-locate the AT&T tower with the existing site that is north on Santa Rosa Ave.

2) Unless the tree is VERY natural looking, I prefer the tower design. I do not like the plain cell tower at all.

I assume the water tower will be well-designed and structural sound, with questions posed at the last meeting included and addressed.

Most of the tree towers I've looked at recently are not natural looking. They look very fake and colored and oddly shaped. For that reason, I think a presumably well-designed water tower will be more aesthetically pleasing and suitable for that spot. Clearly, a manmade structure will be there so my opinion is that a water tower would be a better option than a very fake tree or a plain metal cell tower.

Thank you for your consideration.

Juliana Balistreri
130 Firethorn Dr
Rohnert Park, CA 94928
(707) 585-2358

On Wed, May 19, 2021, 1:23 PM Juliana Balistreri <jmb.metta121@gmail.com> wrote:

> Thank you, Marina!

On Wed, May 19, 2021, 1:21 PM Marina Herrera <Marina.Herrera@sonoma-county.org> wrote:

> Hello Juliana,
>
> No worries on the late request.
> Here you go,
>
> Project documents are located at this link: https://share.sonoma-county.org/link/6mhArY5hHsI/
>
> Details on how to access the meeting via phone are located here:
> https://sonomacounty.ca.gov/Design-Review-Committee/Design-Review-Committee-Meeting-May-19-2021/
>
> *Marina Herrera*
> Planner III
> www.PermitSonoma.org
> County of Sonoma
> 2550 Ventura Avenue, Santa Rosa, CA 95403
> Direct: 707-565-2397 |
> Office: 707-565-1900 | Fax: 707-565-1103
>
> *Due to the Public Health Orders, online tools remain the best and fastest way to access Permit Sonoma's services like permitting, records, scheduling inspections, and general questions. You can find out more about our extensive online services at PermitSonoma.org.*
>
> ***OFFICE HOURS**: The Permit Center has reopened with limited capacity and modified hours. Monday, Tuesday, Thursday, Friday: 9:00 AM – 1:00 PM; Wednesday, 12:00 PM – 4:00 PM.*
>
> *Thank you for your patience as we work to keep staff and the community safe.*
>
> ---
>
> **From:** Juliana Balistreri <jmb.metta121@gmail.com>
> **Sent:** Wednesday, May 19, 2021 1:18 PM
> **To:** Marina Herrera <Marina.Herrera@sonoma-county.org>
> **Subject:** Re: Request-Digital documents for Design Hearing
>
> EXTERNAL
>
> Hi Marina.
>
> Can you please send the design review documents for today's meeting? I want to participate though I might need to xall in by phone.

Sorry for the last minute request!

Thank you!

Juliana Balistreri
130 Firethorn Dr
Rohnert Park, CA 94928
707 585 2357

On Thu, Apr 15, 2021, 3:57 PM Marina Herrera <Marina.Herrera@sonoma-county.org> wrote:

> Hello Juliana,
>
> I sincerely apologize for the delay I have been working under a tight BOS deadline earlier this week! Please find the requested documentation attached. This Public Hearing will only consider design of the facility and not final approval thereof that will occur at a later date at the Board of Zoning Adjustments (TBD).
> Please let me know if you need any additional information prior to next week's hearing. The link to access the hearing is located on the webpage linked below.
>
> https://sonomacounty.ca.gov/Design-Review-Committee/Design-Review-Committee-Meeting-April-21-2021/
>
> *Marina Herrera*
> Planner III
> www.PermitSonoma.org
> County of Sonoma
> 2550 Ventura Avenue, Santa Rosa, CA 95403
> Direct: 707-565-2397 |
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>
> *Thank you for your patience as we work to keep staff and the community safe.*
>
> ---
>
> **From:** Juliana Balistreri <jmb.metta121@gmail.com>
> **Sent:** Tuesday, April 13, 2021 3:07 PM
> **To:** Marina Herrera <Marina.Herrera@sonoma-county.org>

Subject: Request-Digital documents for Design Hearing

EXTERNAL

Re: Permit Sonoma File No. UPE19-0083

Hi Marina.

I'm planning to attend the April 21st Design Hearing for the above permit. Will you please email the digital materials and documents so I can review them in advance?

Thank you!

Juliana Balistreri
130 Firethorn Drive
Rohnert Park, CA 94928
(707) 585-2358

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Let the beauty we love be what we do.
There are hundreds of ways to kneel and kiss the ground.
- Rumi

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