



Supplemental Staff Report to the Zoning Administrator

**Application Number: 161249,
171059**

Applicant: Crown Castle - Sharon James
Owner: State of California, County of Santa Cruz

Agenda Date: December 15, 2017

Agenda Item #: 1

APN: Caltrans and County rights of way.

Time: After 9:00 a.m.

Project Description: The original project proposal is to establish microcell antennas and equipment at seven sites, including six co-located microcell sites and one non-co-located microcell site. On December 1, 2017, the ZA gave preliminary approval to sites 161248, 161250, 161251, 161252 and 161253.

This supplemental staff report (Exhibit H to the original staff report) addresses a determination by the ZA that projects 161249 (DAV 017) and 171059 (DAV 022) require additional analysis of alternatives. Project 161249 (DAV 017) is a proposal to co-locate two crossbar-mounted antennas onto an existing 50' tall utility pole, with two pole-mounted equipment boxes and a meter. Project 171059 (DAV 022) is a proposal to establish a new microcell site consisting of an installed 43' tall utility pole (height requested by County staff in order to place antenna within tree canopy) with two flush-mounted antennas, and an equipment cabinet with mural. The revised description for 161249 (DAV 017) is as follows:

161249 (DAV 017): Proposal to place two flush-mounted, 4-foot tall antennas onto a new tower disguised as a utility pole, with two pole-mounted equipment boxes and a meter.

If the revised project for 161249 is approved, the overall project will result in five co-located sites and two non-co-located sites.

Location: The two supplemental alternative sites are located as follows:

161249 (DAV 017): Cement Plant Road, inland side, approximately 110 feet south of the intersection with 1st Ave.

171059 (DAV 022): Highway 1 right-of-way, seaward side, across Hwy. 1 from the intersections with Ocean Avenue or Marine View Ave.

Supervisory District: 3rd District (District Supervisor: Coonerty)

Permits Required: Coastal Permit, Commercial Development Permit

Technical Reviews: Biotic Report, Archeologic Report

EXHIBIT H

Staff Recommendation:

- Approval of the Mitigated Negative Declaration pursuant to California Environmental Quality Act. (Exhibit E), including the Addendum attached as Exhibit H-1.
- Approval of 161249 (DAV 017) at location Alternative 4, east side of Cement Plant Road, approval of 171059 (DAV 022) at original location, and final approval of Applications 161248, 161250, 161251, 161252 and 161253, based on the attached findings and conditions.

Exhibits (Note: Exhibits A-G attached to original staff report dated 12-1-17)

H. Supplemental staff report

1. Addendum to proposed Mitigated Negative Declaration
2. Visual-simulations and location map, revised for 161249
3. Supplemental Alternatives Analysis for 161249

SUPPLEMENTAL SITES – INFORMATION

Surrounding Land Use: Proposed supplemental site **161249** is adjacent to the Cement plant campus to the east and south, and the railroad to the west and south. The Newtown residential area is approximately 110 feet to the north.

Supplemental site **171059** is across Highway 1 from Ocean Street in Davenport, approximately 200 feet to the southeast of the original site proposed for DAV 022. The residential neighborhood of Davenport is approximately 73 feet northeast of this site, and Pacific School is 235 feet.

Project Access:
Planning Area: t

Public roads
Bonny Doon and North Coast

Land Use Designation:

Supplemental Site
161249 (DAV 017)
171059 (DAV 022)

General Plan
AG (Agriculture)
CN (Neighborhood Commercial)

Zone District:

Site
161249 (DAV 017)
171059 (DAV 022)

Zoning
PF (Public Facilities)
SU (Special Use)

Coastal Zone:

X Inside

 Outside

Appealable to Coastal Com.

X Yes

 No

Environmental Information

Env. Sen. Habitat: Supplemental Site 161249 Alternative 4 is potential red-legged frog dispersal area.

Tree Removal: No trees proposed to be removed

Scenic: All sites mapped scenic resource

EXHIBIT H

Archeology: Supplemental Site 171059 is a known archeological site

Analysis

The supplemental analysis was performed in response to public concern with respect to visual impacts and residential proximity of proposed microcell sites 161249 (DAV 017) 171059 (DAV 022). Microcell antenna are a source of radio-frequency energy emissions.

Project 171059 (DAV 022) is precluded from placement west of Highway 1 by SCCC 13.10.661(A)(2), which states that wireless communications facilities are *prohibited* on the seaward side of the first through public road parallel to the sea unless a Telecommunications Act exception is approved. A Telecommunications Act Exception cannot be approved unless “no alternatives exist which would render the approval of a Telecommunications Act exception unnecessary.”

The original location of proposed project 171059 (DAV 022) would not require a Telecommunications Act Exception, as it has no viable, environmentally superior alternatives outside prohibited and restricted areas (SCCC §§ 13.10.661(C)(3) and 13.10.663(A)(9)). All potential sites on the seaward side of Highway 1 are prohibited by code, would have significant visual impacts and are within or near a known archeological site.

On the *inland* side of the highway, six alternative sites were evaluated by Crown (Exhibit E, Att. 4). Five fell into prohibited zone districts (R-1 and CA) and were closer to residential uses and Pacific School. The sixth site (Alternative F), failed in coverage and had a technical issue.

The antenna proposed at DAV 022 would be well camouflaged within a eucalyptus tree, and the equipment box would be camouflaged with a community mural and screened from northbound lanes by a bus shelter.

Project 161249 (DAV 017) was evaluated for relocation to a new tower placed on the east side of Cement Plant Road, out of sight of the residential neighborhood (see Exhibit H.2). The new antenna would have to be four feet high, in order to increase beam focus to prevent radio waves from striking Monterey Bay. The extra size of the antenna would be obscured by tree foliage. Although new towers are discouraged within 300 feet of a residential neighborhood, the setback can be waived when the proposed location of a new tower is the environmentally superior alternative. The original site proposed for 161249 (DAV 017), which is visible from at least three residences, is the only *co*-located site that meets federal design requirements, although Crown Castle evaluated all of the existing utility poles on the west side of Cement Plant Road. Crown also evaluated two sites for new towers west of the road. The first, 55 feet south of the original site, was still within sight of 2-3 dwellings and raised possible riparian issues. The second site, located approximately 75 feet south of the original site, failed to meet the minimum 25-foot setback required from railroad tracks to the west. Any sites still further south would fail in coverage.

Because the supplemental alternative site to DAV 017 is within an allowed district, is visually superior, is consistent with other provisions of the wireless ordinance and would not require a Telecommunications Act exception, it is preferred over the site originally proposed for 161249.

Safety compliance

Because residents have expressed concern about the safety of radio frequency emissions in the vicinity of the proposed DAV 022, Crown Castle evaluated exposure at the nearest single family residence, and found it to be approximately 4/1,000 of a microwatt, or about 1.2 million times below the federal standard for continuous exposure.

A radio frequency (RF) radiation emissions calculation report (Exhibit F) has been prepared for this project by a qualified consulting engineer. The originally proposed microcell antennas each conform to one of three electronic configurations. In all three configurations, the maximum calculated public exposure at the base of the tower is less than 20% of the allowable national and international standard, so signage is required only at a higher level on the pole itself to address occupational exposure. With required signage, the proposed facilities are calculated to result in RF levels that are compliant with exposure limit standards for both public and occupational exposure. The proposed conditions of approval have been modified (see below) to require a revised RF Safety Compliance Report to address the electronic configuration of the relocated DAV 017 site.

General Plan / LCP

The supplemental alternative location evaluated for project 171059 (DAV 022) is at a significant scenic overlook and tourism destination at the Davenport Bluffs across from the town of Davenport. Placement of a wireless communications facility at this location would be inconsistent with several visual resource policies of General Plan / LCP:

- **5.10.3.** This policy requires protection of public vistas by minimizing the visual intrusion of development, including “utility wires and poles.” Proposed alternative site is much greater visual intrusion than original site.
- **5.10.6.** This policy states, “Where public ocean vistas exist, require that these vistas be retained to the maximum extent possible as a condition of approval for any new development.” The proposed site violates this policy; the original site is compliant.
- **5.10.11.** This policy requires new development in the viewsheds of scenic roads “to be sited out of public view, obscured by natural landforms and/or existing vegetation.” No sites west of Highway 1 in this location can meet this criterion; antennas at original site, however, *are* obscured by existing vegetation.

Both of the preferred sites for projects 161249 (new location) and 171059 (original location) are consistent with the applicable zone district and would not require a Telecommunications Act Exception, as set forth in the table below. The original location of 171059 is environmentally superior to the alternatives, and therefore is allowed within the Restricted Coastal Right-of-Way Area.

**TABLE 1 – ZONING, GENERAL PLAN LAND USE CLASSIFICATION
 AND WIRELESS RESTRICTIONS**

SITE	ZONING	GENERAL PLAN	WIRELESS FACILITIES	TELECOM ACT EXCEPTION	ALTERNATIVES ANALYSIS
161249 (DAV 017)	PF (Public Facilities)	AG (Agriculture)	Allowed Zone	No	Yes
171059 (DAV 022)	SU (Special Use)	P (Public Fac)	Restricted -Hwy 1	No	Yes

Revised Conditions of Approval

The proposed conditions of approval include modifications to address the comments received and the proposed relocation of 161249. These are presented below, with additions in underline and deletions in ~~strikeout~~.

Condition I, summarizing the project:

This permit authorizes the construction of microcell sites at seven locations. At ~~six~~ five sites would be established a collocated antenna and associated equipment; at ~~one~~ two sites a new tower and equipment would be constructed.

Condition II.A.2.a, a new condition addressing the relocated site at 161249 (DAV 017):

A full set of revised plans shall be provided for the relocated site approved for project 161249 (DAV 017), situated in the public right-of-way approximately 30 feet east of the original site (and close to an existing exposed metal pipe), including a new tower camouflaged as a utility pole, two flush-mounted antennas, pole-mounted equipment and underground power supply (unless undergrounding is infeasible). The antenna and equipment color shall be eucalyptus green as indicated in the exhibited photo simulation. A revised RF Safety Compliance report shall be provided to address the revised electronic configuration. All mitigation measures for DAV 017 required by the approved Mitigated Negative Declaration shall apply, including red-legged frog and Western burrowing owl avoidance and mitigation.

Condition II.A.3.c, addressing the mural at 171059 / DAV 022:

The County Parks Department will oversee the engagement of an artist to provide for the application of a detailed, high-quality mural painted directly onto the front and side surfaces of the equipment cabinet at DAV 022. The mural will reflect a theme or themes intrinsic to the Davenport Community, potentially including such themes as whales, Davenport bluffs and beach, farmlands / farmworkers (mandatory), St. Vincent DePaul Church, railroad / lumber / cement trains, intertidal organisms, Coastal marine terrace geology, Coastal scrub, grassland or redwood habitats, steelhead, red-legged frog, birds of prey, hiking or other images relevant to Davenport.

Condition III.B:

The applicant shall demarcate the proposed locations of the proposed towers at DAV 017 and DAV 022, and work shall not commence until ~~this~~these locations ~~has~~have been inspected and approved by County staff, including a discussion of potential project modifications to minimize limb removal on the overhanging eucalyptus trees and maximize screening of the proposed antenna by tree foliage as feasible, and limbs accepted for removal or modification have been flagged by the applicant and confirmed by staff. At DAV 017, an on-site demonstration pole shall be placed to confirm that the proposed height of the pole and antenna minimizes visual exposure while providing adequate coverage. Final height may be subject to modification pursuant to visual confirmation by County staff.

Environmental Review

Environmental review has been required for the proposed project per the requirements of the California Environmental Quality Act (CEQA). The project was reviewed by the County's Environmental Coordinator on September 25, 2017. On this date, the Environmental Coordinator made a preliminary determination to issue a Negative Declaration with Mitigations. The Negative Declaration main text is attached as Exhibit E.

The selection of an alternative site for project 161249 (DAV 017) required preparation of an Addendum to the proposed Mitigated Negative Declaration. The Addendum was reviewed by the Environmental Coordinator on December 6, 2017 and recommended for adoption as part of the proposed Mitigated Negative Declaration.

The alternative site proposed for project 161249 (DAV 017) is approximately 30 feet to the west of the original site and within the 50-foot diameter of the buffer are originally evaluated for the site by in the Biotic Report (Exhibit E, Attachment 5). No sensitive plant species were found at the site. The proposed Mitigated Negative Declaration includes measures for the original 161249 site to avoid and minimize potential impacts to Western burrowing owl and red-legged frog. The alternative site requires no changes to the Mitigated Negative Declaration, and does not affect the negative declaration conclusions or finding of less-than-significant impact.

With the project design, modifications and proposed mitigation measures provided by the Mitigated Negative Declaration (Exhibit E), the potential impacts from the proposed development would remain less than significant.

Conclusion

The proposed project, revised to relocate and reconfigure cell site 161249, with revised conditions, is consistent with all applicable codes and policies of the Zoning Ordinance and General Plan/LCP. Exhibit A (Findings), requires no updates other than minor changes to reflect the fact that the project now includes two new towers camouflaged as utility poles instead of one. The County Environmental Coordinator has made a preliminary determination to include in the Mitigated Negative Declaration the Addendum attached as Exhibit H.1., while the findings and conclusions of the Mitigated Negative Declaration remain unchanged, reflecting less than significant environmental impacts pursuant to the California Environmental Quality Act.

Staff Recommendation

- Approval of the Mitigated Negative Declaration pursuant to California Environmental Quality Act. (Exhibit E), including the Addendum attached as Exhibit H.1.
- Approval of 161249 (DAV 017) at location Alternative 4, east side of Cement Plant Road, approval of 171059 (DAV 022) at original location, and final approval of Applications 161248, 161250, 161251, 161252 and 161253, based on the attached findings and conditions.

Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Department, and are hereby made a part of the administrative record for the proposed project. The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.co.santa-cruz.ca.us.

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CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) ENVIRONMENTAL REVIEW INITIAL STUDY - ADDENDUM

Date: December 6, 2017

Application Number: 161249

Staff Planner: Jerry Busch

Project: The Davenport Gap wireless project is to construct seven microcell sites on the North Coast of Santa Cruz County at intervals between Laguna Road and Swanton Road (applications 161048-161053, 171059). This addendum addresses a proposed modification of project site 161249 (DAV 017). The original project 161249 was to add two crossbar-mounted, 2' antennas onto an existing 50' tall utility pole, with two pole-mounted equipment boxes and a meter. The proposed alternative project is to construct a new cell tower camouflaged as a utility pole, with two flush-mounted, 4' antennas, two pole-mounted equipment boxes and a meter.

APPLICANT: Crown Castle

APN(s): County r.o.w.

OWNER: County of Santa Cruz

SUPERVISORAL DISTRICT: Third

PROJECT LOCATION: Original site: seaward side of Cement Plant Road approximately 90 feet southwest of the intersection with First Ave. Proposed site: inland side of Cement Plant Road approximately 110 feet southwest of the intersection with First Ave., approximately 30 feet to the east of the original site, across the street.

I. USE OF AN ADDENDUM TO A NEGATIVE DECLARATION

This document is prepared as an Addendum to the Initial Study/Negative Declaration prepared for Application numbers 161048-161053, and 171059, dated September 25, 2017, which resulted in a preliminary determination to issue a Negative Declaration with Mitigations. The mandatory public comment period expired on October 31, 2015. Minor modifications were made to the proposed initial study proposed for adoption by the Zoning Administrator to correct code references and interpretations in the Initial Study, which did not affect the conclusions or proposed mitigation and monitoring plan. These did not require preparation of an addendum.

The Addendum has been prepared according to Section 15164 of the California Environmental Quality Act (CEQA) Guidelines, which provides for the use of this form of environmental documentation when minor technical changes or additions are necessary. Guidelines indicate that an Addendum need not be circulated for public review but can be included in or attached to the adopted Mitigated Negative Declaration. This Addendum addresses the addition of a site relocation

to the project which would not cause any new significant environmental impacts requiring mitigation.

This document evaluates the differences, if any, in potential environmental impacts evaluated in the previous CEQA document. This Addendum is an administrative action to update the existing September 25, 2017, Initial Study/Mitigated Negative Declaration.

California Environmental Quality Act Requirements

The California Environmental Quality Act (CEQA) Guidelines, allow “[a]n addendum to an adopted negative declaration [to] be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.” (14 CCR 15164(b).)

Section 15162, subdivision (a), of the CEQA Guidelines establishes the following circumstances that would require the preparation of a subsequent EIR:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the

environment, but the project proponents decline to adopt the mitigation measure or alternative.

- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

II. PROJECT BACKGROUND

Application 161249 for co-located microcell site was initially considered at a public hearing on December 1, 2017, before the Zoning Administrator. In response to public comments, the Zoning Administrator requested staff to evaluate any alternative to the proposed site for 161249 to reduce the visual impact on the adjoining neighborhood of Davenport Newtown.

Staff conducted a field meeting with the applicant and determined that a new cell tower located approximately 30 feet to the east of the original site would have a reduced visual impact, as the equipment would not be visible to any residence and the antenna would likely not be visible to any residence.

ENVIRONMENTAL SETTING AND SURROUNDING LAND USES:

Both the original project site on the seaward side of Cement Plant Road right-of-way, and the proposed alternative location on the inlands side of the right-of-way, 30 feet to the east, are located within non-native roadside vegetation. The original site is across the street from the Cement plant campus to the east and south, and the proposed site is adjacent to the Cement plant campus. The original site is adjacent to a railroad right-of-way to the west and south; the proposed site is across the street from the railroad right-of-way to the west and south. The original site is approximately 90-95 feet southeast of the Newtown residential area; the proposed alternative site approximately 110 feet to the southeast of the Newtown residential area. The original site is about 511 feet easterly of a pond on the Cement Plant campus, while the proposed site is approximately 478 feet easterly of the pond. The original site is approximately 10 feet south of a culvert discharge and riparian vegetation; the proposed site is approximately 40 feet southeast of this culvert discharge and associated vegetation. The proposed site is adjacent to and beneath a eucalyptus grove; the original site is approximately 30 feet from the grove and across the street.

III. ENVIRONMENTAL EVALUATION

Project Description

This Addendum addresses the relocation of the proposed wireless microcell site across the street from the original site, and the installation of a new cell tower camouflaged as a utility pole instead of co-location on an existing utility pole.

Evaluation of Environmental Impacts from Amended Proposal

The analysis below provides an assessment of the net effect of the revisions on the analysis contained within the adopted Initial Study/Mitigated Negative Declaration.

Agriculture and Forestry Resources

The amended proposal would not impact agricultural or forestry resources or land zoned for agricultural uses in that the revised location is in the same PF zone district and not within any agricultural or forested area. Therefore, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Air Quality

No impacts to air quality would be anticipated to result from the original project or the modification. Given this, no mitigation measures or project revisions are necessary.

Biological Resources

The original site was evaluated in a Biotic Report accepted for the project. The proposed project site, along with a 50 foot-diameter buffer area, was evaluated by a qualified biologist. The alternative site proposed for project 161249 (DAV 017) is approximately 30 feet to the west of the original site and within the 50-foot diameter of the buffer are originally evaluated for the site.

No sensitive plant species were found at the site.

Potential habitat for Western burrowing owl was found in the buffer area. To insure that no impacts to Western burrowing owl occur, the MMRP provides for measures to avoid and minimize potential impacts to burrowing owls during construction of the proposed cell site. The same mitigation measures are adequate to avoid and minimize potential impacts to the proposed site, which will involve approximately the same size construction and staging envelope as the original site at a new, adjacent location across the street. Therefore, no modification to the proposed mitigation and monitoring measures for Western burrowing owls are required.

The original site for 161249 was also found to include upland aestivation and dispersal habitat for red-legged frog. No breeding habitat or any sign of the species was found at the project site or buffer area during biological surveys, but the site and the proposed alternative are approximately 400-500 feet west of a possible breeding pond where red-legged frog is known to occur.

The construction and staging envelope for the new location is of similar size to that for the original site at a new, adjacent location across the street, requiring the same mitigation measures to avoid and minimize impacts. The proposed mitigation measures and construction protocols include pre-construction surveys, exclusion fencing, worker training, USFWS consultation if frogs are encountered, and removal standards and reference protocols. The alternative site requires no changes to the mitigation and monitoring plan, and does not affect the negative declaration conclusions or finding of less-than-significant impact.

Cultural Resources

The archeological report prepared for the project found no recorded sites or locations of documented cultural significance at site 161249. A “windshield style” archeological survey was conducted that entailed inspection of undisturbed soils in the vicinity of the proposed site and inspection of any rodent back dirt or fill material. Both the original site and proposed location of 161249 are within disturbed soils adjacent to the County road and ditch work. Any future development would be subject to County Code Section 16.40.040, i.e. if at any time in the preparation for or process of excavating or otherwise disturbing the ground, any human remains of any age, or any artifact or 100 years of age are discovered, the responsible persons shall immediately cease and desist from all further site excavation and comply with the notification procedures given in the County Code Section 16.40.040. These requirements are incorporated into the mitigation and monitoring plan. This Cultural Resources section of this Addendum was reviewed and accepted by David Brunzell, the author of the Archeological Report. No new potentially significant effects have been identified and no mitigation measures or project revisions are necessary.

Geology and Soils

The proposed site relocation would have no significant impacts related to site geology and soils since the entire site was evaluated as a whole by the soils engineer and the site relocation is to a setback located within the development envelope. Site conditions remain the same, and no mitigation measures or project revisions are necessary.

Greenhouse Gas Emissions

The proposed site relocation would have no additional impact on Greenhouse Gas Emissions as approximately the same vehicles and equipment would be used during construction with or without the inclusion of a site relocation. Given this, no mitigation measures or project revisions are necessary.

Hazards and Hazardous Materials

The inclusion of a site relocation would not create a significant hazard to the public or the environment as a result of the routine transport, storage, use, or disposal of hazardous materials in that no such materials are a part of the original or amended project. Therefore, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Hydrology, Water Supply, and Water Quality

The proposed site relocation would have no effect on hydrology, water supply or water quality in that the street side yard setback site relocation is for an area already within the development envelope. No additional runoff would be generated in that the land division is limited to 15,000 square feet of new disturbance. Therefore, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Land Use and Planning

Both the original site for 161249 and the proposed alternative are within an allowed zoning district, PF (public facilities).

County code section 13.10.663(A)(9) provides that any new tower shall be set back at least 300 feet from the property line of any residentially zoned parcel, or the property line for any public primary or secondary school. The code allows this requirement to be waived if the proposed tower addresses a service gap and would have a reduced environmental impact from a co-located site.

The original site would be obliquely visible to only 1-3 dwellings at Davenport Newtown and would be located on the side of an existing pole facing away from the community, on a street where there are numerous utility poles and ground sites with extensive utility equipment and cabinetry. The original site was considered to represent a less-than-significant impact. However, the proposed alternative would not be visible to any residences, and thus would improve compliance with the County Code.

County General Plan policy 5.10.11 requires new development in scenic areas to be sited out of public view, obscured by natural landforms and/or existing vegetation where possible. The original site was not so obscured; the antennas (now 4-feet tall) for the proposed site would be hidden by the canopies of surrounding eucalyptus trees, and the trees would screen the pole-mounted equipment boxes from the neighborhood to the north. The alternative site provides better compliance with the General Plan policy.

Mineral Resources

The proposed changes would not impact mineral resources or land zoned for mineral extraction as the project is located in a residential zone district where no mineral extraction is allowed. Therefore, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Noise

The previously adopted Initial Study/Mitigated Negative Declaration found that no significant noise impact would result from the project. The addition of a site relocation to the project would not result in any additional noise impact. The project would continue to be subject to the noise limits as outlined in Chapter 6 (Public Safety and Noise) of the County of Santa Cruz 1994 General Plan and the previous environmental document. Therefore, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Recreation

The addition of a site relocation to the project would have no effect on recreational facilities as no increase in the number of dwellings would result from the site relocation. Therefore, no increase in demand on recreational facilities would occur. No new significant effects have been identified and no mitigation measures or project revisions are necessary.

Population and Housing

The addition of a site relocation to the project would have no effect on population growth. Therefore, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Public Services

The addition of a site relocation would not lead to an increase in demand for public services as no additional residences would result from it. Therefore, the proposed site relocation would not result in any new significant effects.

Transportation/Traffic

The proposed site relocation would have no effect on the traffic generated by the project as no additional dwelling units would result from the inclusion of the site relocation in the project. No new significant effects have been identified and no mitigation measures or project revisions are necessary.

Utilities and Service Systems

The proposed site relocation would not increase the demand on utilities or service systems in that no additional dwelling units would result from the inclusion of the site relocation in the project. Given this, no new significant effects have been identified and no mitigation measures or project revisions are necessary.

Visual Resources and Aesthetics

As discussed above, the proposed site would improve compliance with visual resource policies of the County Code and General Plan LCP. The proposed site would be less visible to the neighborhood, and the antennas would be screened view from most vantage points by eucalyptus tree canopies. The conditions of approval for the project will be modified to include a requirement that the antenna height be field-tested to allow adequate coverage while maintaining minimal or zero visibility to surrounding development. Therefore, the proposed alternative site improves protection of visual resources and requires no modification of the mitigated negative declaration.

Mandatory Findings of Significance

Analysis of the proposed project *did not identify the potential to* degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Analysis of the proposed project *did not identify the potential to* have impacts that are individually limited, but cumulatively considerable.

Analysis of the proposed project *did not identify the potential to* have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

IV. CONCLUSION

The inclusion of a site relocation is within the scope of the September 25, 2017, Initial Study and Mitigated Negative Declaration (Exhibit E); no new potentially significant environmental impacts were identified as a result of relocating the originally proposed co-located site at 161249 (DAV 017) 30 feet to the east, to a new tower across the street, disguised as a utility pole. The findings and conclusions of the original Mitigated Negative Declaration are unchanged. Therefore, no further environmental review is required.



Todd Sexauer
Environmental Coordinator

12-7-17

Date



Existing



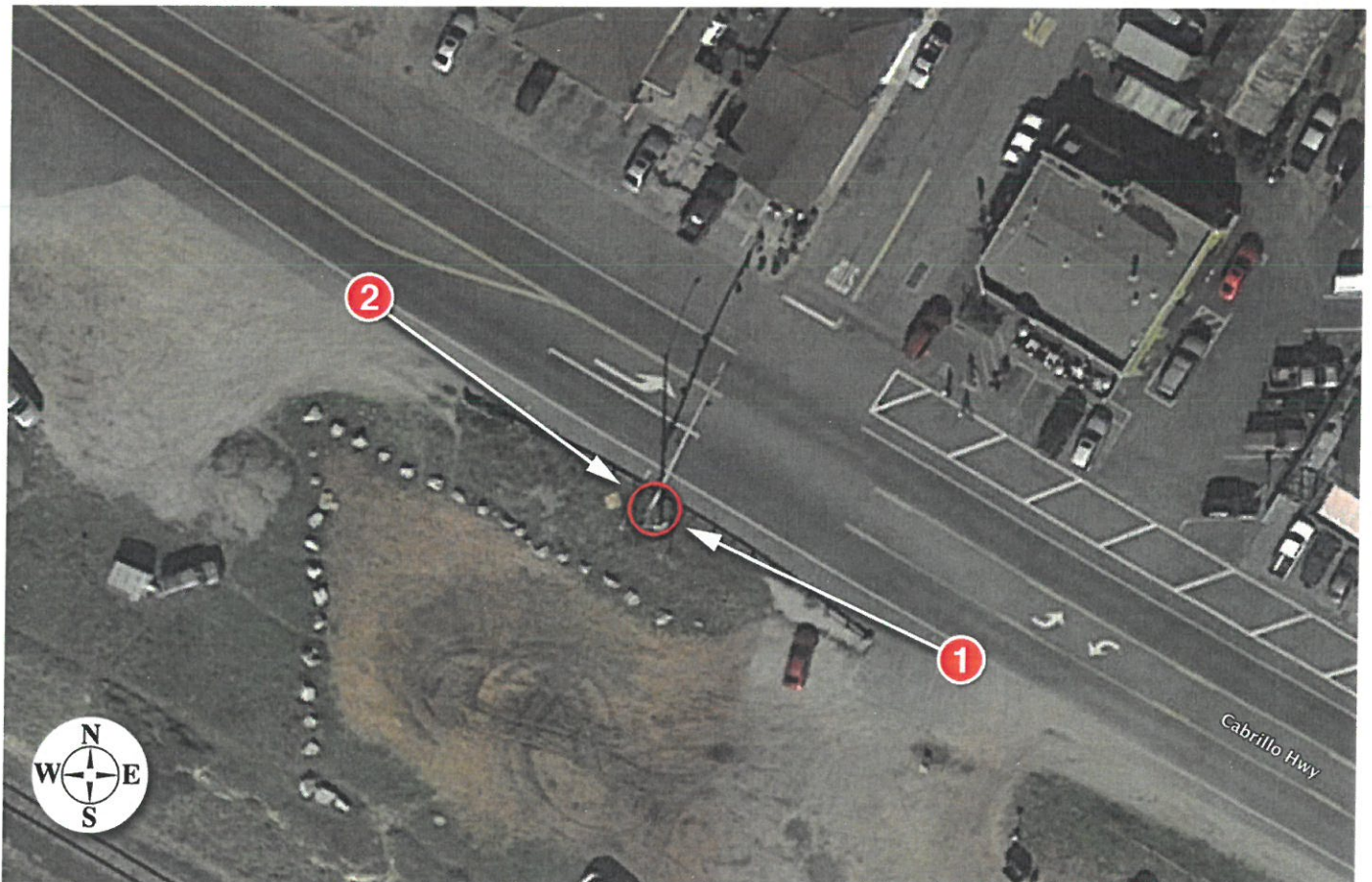
Proposed



Existing



Proposed





Existing



Proposed

EXHIBIT H.2



12/06/17

DAV-017

140 ft SW of 1st Avenue
Davenport, CA

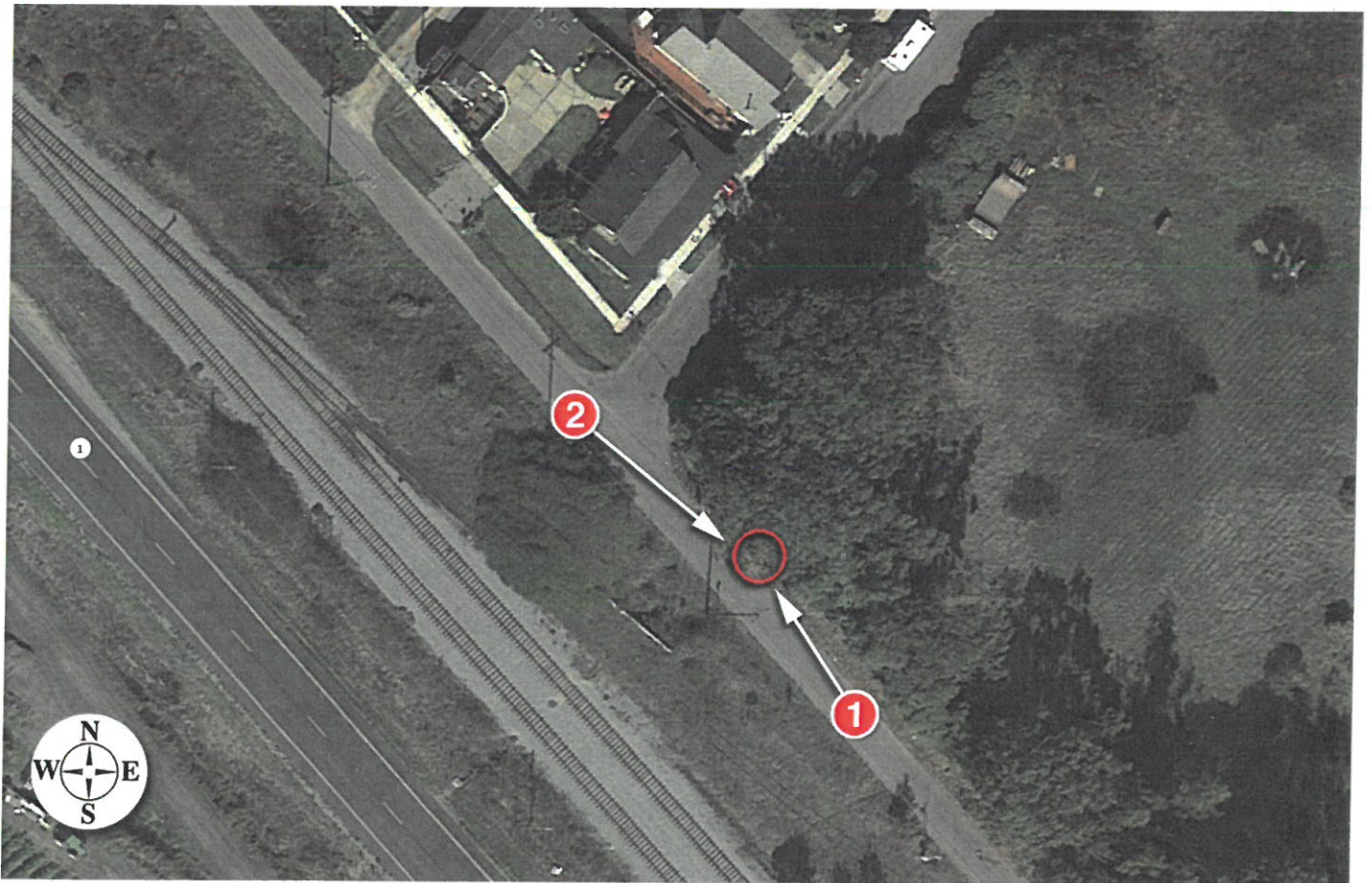
Looking Northwest from Cement Plant Road

View #1

Applied Imagination 510 914-0500



EXHIBIT H.2





12/06/2017

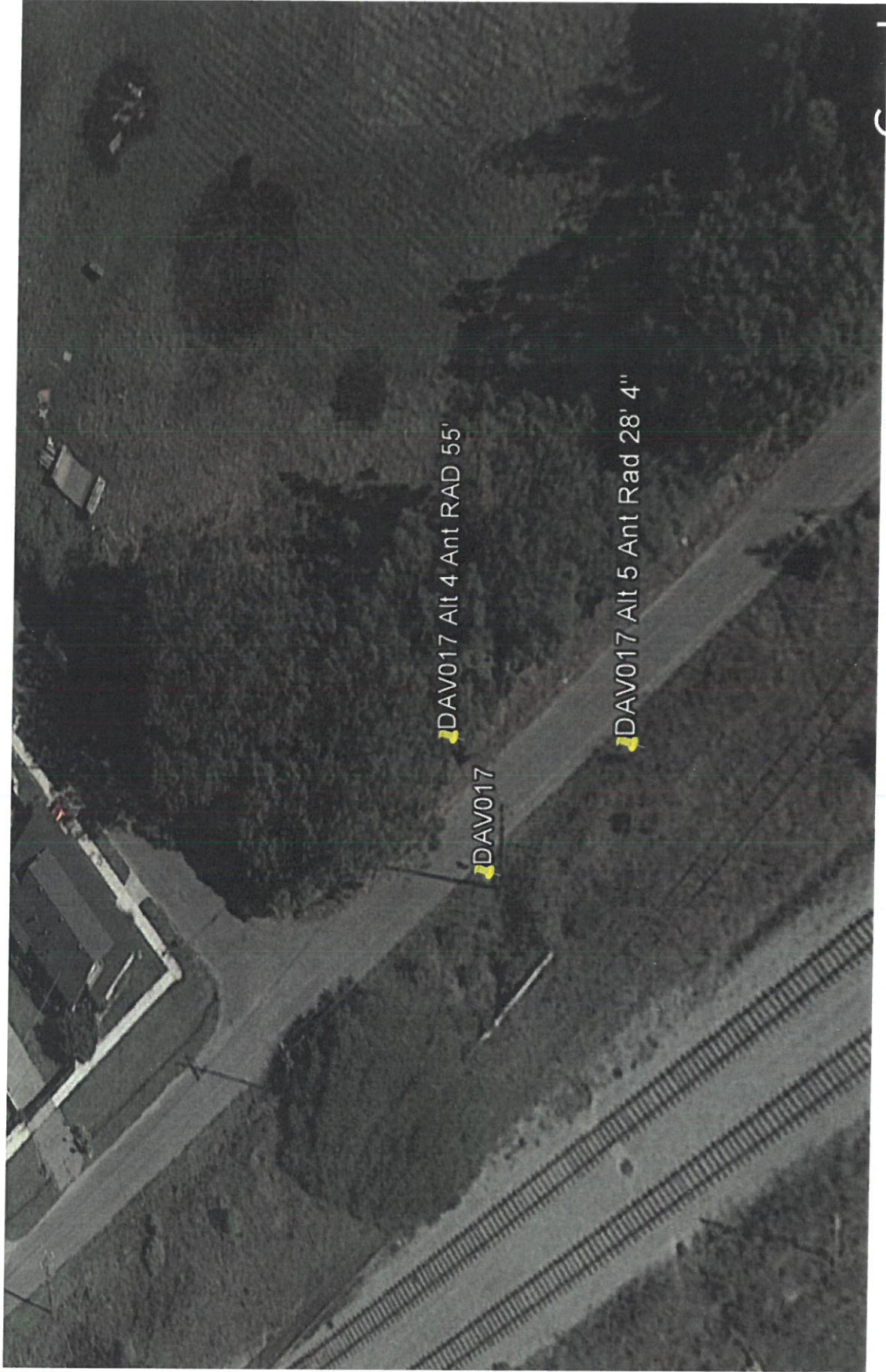
Davenport Gap

Original DAV₁₇ Pole and Alternatives

The Foundation for a Wireless World.

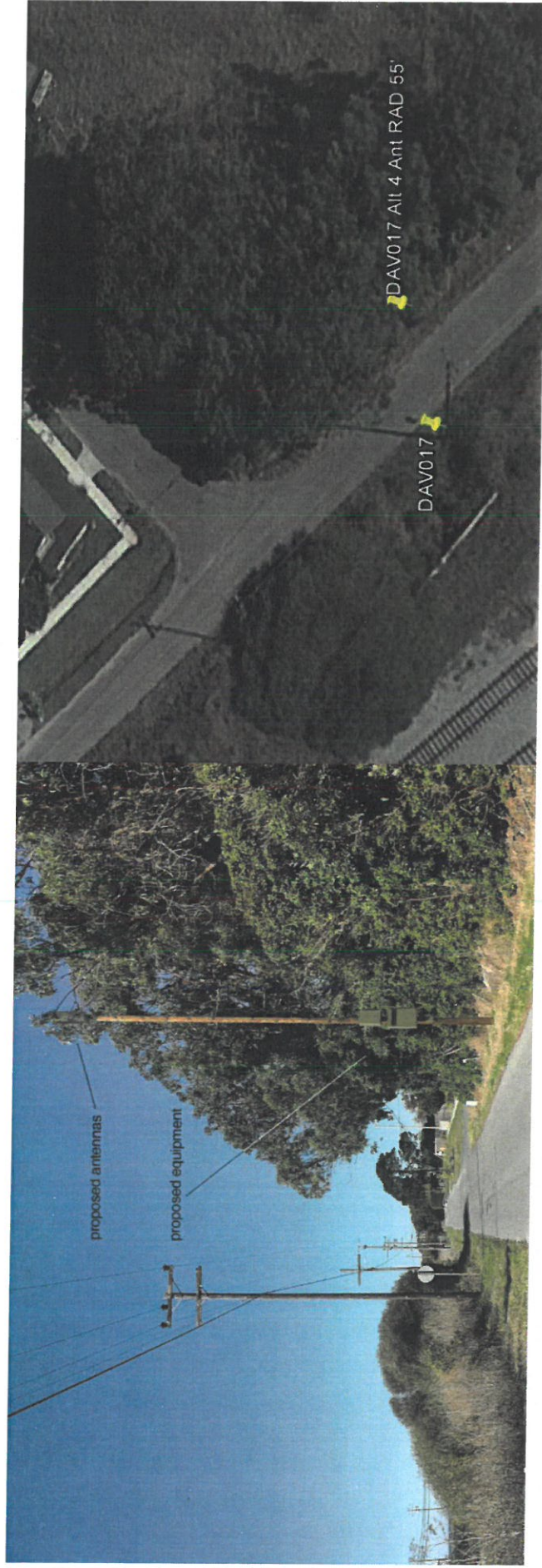
Davenport Gap

Original DAV 17 Candidate + 2 Alternative Pole Locations



Davenport Gap

DAV017 Alternative 4

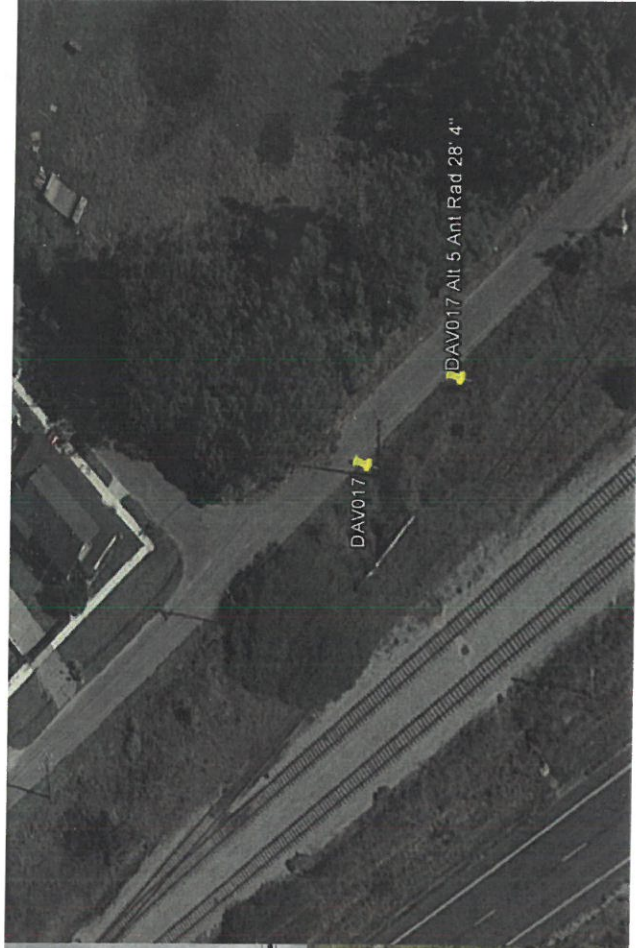


DAV017 Alternative 4:

- Location will work but will need to change the 2ft panel antenna to a 4ft panel antenna.
- The antenna RAD center will be 55 feet
- The reason we need to change the antenna is to control the RF signal from leaking over into the Monterey area for the antenna pointing south.
- The vertical beamwidth of a 2ft panel is 40° vs 17.6° of a 4ft panel antenna.
- Remote Electrical downtilt (RET) is available for 4ft panel antennas which can help optimize the RF energy from interfering into the Monterey area.

Davenport Gap

DAVo17 Alternative 5



DAVo17 Alternative 5:

- New pole location will 55 feet away from original DAV17 candidate
- Visibility of new pole will still be visible from New Town residents, therefore adding an additional pole location will only add to the number of poles on that street.
- The antenna RAD center will be 28 feet 4 inches
- Will need to perform CW testing to verify RF coverage to New Town residents to this pole location.