

May 25th, 2021

**Via: email**

Adam Ross – Interim Senior Planner  
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**RE: New Crown Castle tower 831637  
1236 Cleveland Ave Santa Rosa, CA 95401  
Planning file# CUP20-074**

Dear Adam:

Please find this follow up from our project call on May 19<sup>th</sup>, 2021. The primary topics are:

Migratory bird research  
CEQA exemption

Attached is 35-page technical memorandum from Genevieve Rozhon with the consulting firm GHD Inc. The report analyses several Federal and State regulatory agencies and their respective policies:

1. Federal regulatory history
2. Cal Fish & Game Code
3. Migratory Bird Protection Act
4. Santa Rosa General Plan

Additional database research:

- California Natural Diversity Database, BIOS, and USFWS Information on Planning and Consultation, US Geological Survey
- Citizen science databases

Report results begin on page five of 35 and the report conclusion is shown on page eight of 35:

## Conclusion

Based on the analysis herein, with the incorporation of the BMPs listed above, the proposed Project is not expected to “*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*” per the Appendix G Checklist. The Project will have no impact on avian migratory movements and migration corridors.

## CEQA Exemption

The next section of this letter supports the CEQA exemption 15300.2 that we discussed on the call. The following is directly from CEQA statutes with a supporting statement added at the end of each section. Formatting changes made for ease of reading and review of the added statements.

### 15300.2. Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. **(The proposed project is not critical habitat and therefore has no effect on migratory bird patterns. See enclosed Technical Memorandum prepared by GHD Inc.)**

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant **(The proposed project will remove one existing wireless communication facility and replace it with one new wireless communication facility. See planning exhibit showing the existing wireless communication facilities in the area. The new proposed mono-redwood will reduce the visual impairment of the existing monopole by concealing the antennas within faux branching to mimic the nearby redwoods adjacent to the proposed tower location.)**

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. **(No impact as there are no unusual circumstances.)**

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR. **(Not applicable – no scenic highway designation in this part of Santa Rosa.)**

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. **(Not applicable – proposed location not on Hazardous Waste site – see EnvironStor for reference.)**

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource **(Proposed location not a historic resource.)**

We believe this addresses the items we covered on the call. Please let us know what additional information you may need.

Sincerely,

*Tim Page*

Tim Page, AICP – Program Manager  
Crown Castle