

ATTACHMENT E

CITY OF PASADENA 175 NORTH GARFIELD AVENUE PASADENA, CA 91101-1704

INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," and/or Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

SECTION I – PROJECT INFORMATION

1. Project Title: Proposed Telecommunications Equipment Facilities Standards for Title 12 and revisions to existing Telecommunication Facility standards in Title 17 of the Pasadena Municipal Code.
2. Lead Agency Name and Address: The lead agency for the proposed project is the City of Pasadena, with project involvement coming from both the Planning and Development Department and the Department of Public works. Addresses are as follows:
 - City of Pasadena
City Hall
100 N. Garfield Avenue
Pasadena, CA 91109
 - Planning and Development Department
175 N. Garfield Avenue
Pasadena, CA 91101
 - Department of Public Works
City Hall
100 N. Garfield Avenue, Third Floor
Pasadena, CA 91109
3. Contact Person and Phone Number: José Jimenez, Planner, (626) 744-7137
4. Project Location: The proposed project is an Amendment to the Pasadena Municipal Code (PMC), which would apply citywide throughout the City of Pasadena, Los Angeles, County, CA
5. Project Sponsor's Name and Address: City of Pasadena
Planning and Development Department, 175 N. Garfield Avenue, Pasadena, CA 91101; and

Department of Public Works, City Hall, 100, N.
Garfield Avenue, Third Floor, Pasadena, CA 91109

6. General Plan Designation: Citywide/all City General Plan Designations and the Public Right-of-Way
7. Zoning: Citywide/all City Zones and the Public Right-of-Way
8. Description of the Project:

The City of Pasadena is proposing to amend Pasadena Municipal Code (PMC) Titles 12 "Streets and Sidewalks" and 17 "Zoning" as they relate to telecommunications equipment facilities. The intentions of the proposed code amendments are to (1) improve the regulation of the installation and maintenance of telecommunication facilities and equipment¹ in both the public right-of-way and on assessed parcels; (2) establish requirements and standards for telecommunication equipment facilities in the public right-of-way; and (3) establish an "Opportunities Map" and corresponding incentives to encourage the siting of minor telecommunication facilities² and their associated ground mounted equipment cabinets on preferred locations. The following sections summarize the proposed amendments to PMC Titles 12 and 17, respectively. Title 12 regulations will apply to the public right-of-way and the existing Telecommunication Facilities standards that will be updated in Title 17 apply to private property (including City owned property).

Proposed Amendments to PMC Title 12 "Streets and Sidewalks"

The City is proposing to amend PMC Title 12 by adding a new "Telecommunication Equipment Facility Ordinance". In general, the proposed Ordinance would regulate telecommunication antennas, equipment cabinets, and other ground-mounted or partially above-ground telecommunication facilities that are located or proposed to be located in the public right-of-way. In summary, the proposed Ordinance would:

- Prohibit telecommunication facilities and equipment in the street;
- Prohibit telecommunication facilities and equipment where a dangerous condition or obstruction is created;
- Establish permit requirements and corresponding findings for installation and maintenance of telecommunications facilities in the public right-of-way;
- Establish installation standards for telecommunications facilities and equipment in the public right-of-way, including:
 - Color requirements;

¹ Telecommunications facilities and equipment include any ground-mounted or partially above-ground cabinet, pedestal, meter, tunnel, vault, equipment, splice box, surface location marker, antenna or structure to be used to provide telecommunications and/or video services. This excludes all independently-located gas, electric, and other utility equipment necessary to power the telecommunications equipment facility.

² Per PMC § 17.80, "Major" and "Minor" Wireless Telecommunications Antenna Facilities are defined as:

- Wireless Telecommunications Antenna Facilities, Minor. A wireless telecommunications antenna facility that is designed to be building-mounted, or co-located on an existing structure with the facilities or other wireless communications service providers, or located on City-owned property or within a City-owned street on "multiple-use facilities" (e.g., a street light, utility pole, traffic signal, or sign).
- Wireless Telecommunications Antenna Facilities, Major. A wireless telecommunications antenna facility that is designed as a freestanding structure.

- Restrictions for location in relation to residential structures (no more than 1 per each residential frontage; and only allowed along the corner side yard for corner lots in residential districts);
 - Landscaping/screening requirements;
 - Maximum height restrictions for antenna arrays;
 - Minimum height requirements for structures on which such facilities/equipment can be mounted;
 - City pole replacement requirements;
 - Restrictions on the types of antennas;
 - Prohibition of monopoles;
 - Prohibition of the use of chain link fencing and razor wire;
 - Restrictions on illumination; and
 - Prohibition of private or applicant signage on facilities.
- Establish maintenance standards for facilities in the public right-of-way; and
 - Establish insurance and indemnification requirements for telecommunication facilities in the public right-of-way;
 - Establish a permitting process and notification procedures for such facilities in the public right-of-way.

Proposed Amendments to PMC Title 17 “Zoning”, Section 17.50.310 “Telecommunications Facilities”

The City is proposing to amend the existing “Telecommunications Facilities” section of the Zoning Code (PMC § 17.50.310) to improve the regulation of such facilities on assessed parcels (i.e., not within the public right-of-way). In summary, the existing and proposed regulations are as follows:

- Existing requirements for all telecommunication antenna facilities on assessed parcels include:
 - Prohibition of the use of chain link fencing and razor wire;
 - Screening requirements for all support facilities housed outside of structures;
 - Prohibition of illumination for building-mounted facilities and support structures, except when required by the Federal Aviation Administration (FAA) or other government agencies;
 - Sign restrictions; and
 - Maintenance requirements.

No changes are proposed to the aforementioned requirements.

- Existing and proposed requirements for new support structures (Wireless Telecommunication Facilities, Major³) include:
 - Prohibited from projecting from the roof of a building (existing);
 - Minimum 10-ft separation distance from existing buildings on the same site (existing);
 - Required setback from residential use/zoned land (existing);
 - Encouragement of co-location (existing);
 - Maximum height restriction (60 ft existing, 50 ft proposed);

³ Per PMC § 17.80, “Wireless Telecommunications Antenna Facilities, Major” is defined as “a wireless telecommunications antenna facility that is designed as a freestanding structure.”

- Location requirements (proposed);
 - Distance requirements for facilities that are not to be co-located or located on an Opportunities Map location (proposed);
 - Prohibition of monopoles in Historic Districts (proposed);
 - Faux tree design requirements (proposed);
 - Requirements for monopoles designed as flag poles;
 - Findings required for approval (existing with proposed text cleanup); and
 - Security requirements (existing).
- Existing and proposed requirements for building-mounted facilities (Wireless Telecommunication Facilities, Minor⁴) include:
 - Height restrictions for antenna arrays (existing with text modification proposed, including reducing the maximum height of whip antennas and omni-directional antennas from 15 to 10 feet above the roof line or parapet of an existing structure);
 - Requirements for architecture, color, texture, and materials (proposed);
 - Removal of the requirements for multiple-use facilities (proposed for deletion); and
 - Establishment of an “Opportunities Map” that identifies preferred locations for siting minor telecommunication facilities and their associated ground mounted equipment cabinets (proposed). The proposed code amendment identifies incentives for the use of sites on the Opportunities Map, along with corresponding application requirements and required findings for approval. Proposed incentives include:
 - Permitting certain minor telecommunication facilities and their associated ground mounted equipment cabinets through an Administrative Site Application⁵;
 - Reduced application fee; and
 - Expedited permit processing.

9. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings):

The proposed modifications to the PMC apply citywide throughout Pasadena. The City of Pasadena lies in the San Gabriel Valley portion of the Los Angeles Basin. The San Gabriel Valley is bounded by the San Gabriel Mountains to the north and a series of hills to the west, east, and south, including the San Rafael Hills on the west, the Montebello and Puente Hills on the south, and the San Jose Hills on the east. The City of Pasadena is located in the western portion of the San Gabriel Valley with the San Rafael Hills traversing the western portion of the City.

Pasadena is a largely developed, urban/suburban City in Los Angeles County with a historic urban core, suburban residential neighborhoods, hillside communities, and the natural areas of

⁴ Per PMC § 17.80, “Wireless Telecommunications Antenna Facilities, Minor” is defined as “a wireless telecommunications antenna facility that is designed to be building-mounted, or co-located on an existing structure with the facilities or other wireless communications service providers, or located on City-owned property or within a City-owned street on ‘multiple-use facilities’ (e.g., a street light, utility pole, traffic signal, or sign).”

⁵ Wireless telecommunication antenna facilities (major and minor) are currently not allowed by right in any zone in Pasadena and are not allowed at all in certain zones. In zones that do allow wireless telecommunication antenna facilities, either a Conditional Use Permit (CUP) or a Minor Conditional Use Permit (MCUP) is required, depending on the zone and the type of facility. In general, where allowed, “Major” facilities require a full CUP and “Minor” facilities require a MCUP.

the Arroyo Seco and San Rafael Hills. Other notable land uses in the City include the Rose Bowl, the Jet Propulsion Laboratory (JPL), Pasadena City College, and the California Institute of Technology (Caltech).

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement):

The proposed code amendment requires adoption of an ordinance by the Pasadena City Council. Prior to consideration by the City Council, the Pasadena Planning Commission will hold a hearing and make a recommendation on the proposed code amendment. The proposed project does not require discretionary approvals from any public agency other than the City of Pasadena.

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
 - 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
 - 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
 - 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 20, "Earlier Analysis," may be cross-referenced).
 - 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 20 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant
-

Potentially
Significant
Impact

Significant
Unless
Mitigation is
Incorporated

Less Than
Significant
Impact

No Impact

SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: November 3, 2008
Department requiring checklist: Planning and Development and Public Works
Case Manager: José Jimenez

2. ENVIRONMENTAL IMPACTS. (Explanations of all answers are required):

Potentially
Significant
Impact

Significant
Unless
Mitigation is
Incorporated

Less Than
Significant
Impact

No Impact

3. AESTHETICS. Would the project:

a. *Have a substantial adverse effect on a scenic vista?*

WHY? The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. Since no physical changes to the environment are proposed, approval of the proposed PMC modifications would not directly impact scenic vistas. Similarly, the proposed PMC revisions would not indirectly impact scenic vistas, as none of the proposed changes would affect height restrictions, setbacks, or other requirements in the PMC that protect scenic vistas views – other than a proposed decrease in the maximum height of new support structures (Wireless Telecommunication Facilities, Major). Therefore, the proposed project would have no impact on scenic vistas.

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

WHY? There are two roadways in Pasadena identified in the California Scenic Highway Program, the Angeles Crest Highway (SR 2) and a portion of the Foothill Freeway (I-210). The Angeles Crest Highway, which located north of Arroyo Seco Canyon in the extreme northwest portion of the City, is an Officially Designated State Scenic Highway. The Foothill Freeway from SR 134 to the northwest City limits and beyond is an Eligible State Scenic Highway.

The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. No physical changes to the environment are included in the proposed project and none of the proposed revisions to the City's municipal code would affect height restrictions, setbacks, or other requirements in the PMC that protect scenic resources – other than a proposed decrease in the maximum height of new support structures (Wireless Telecommunication Facilities, Major). Therefore, approval of the proposed PMC modifications would not directly or indirectly damage scenic resources, including scenic resources along a scenic roadway.

Potentially
Significant
Impact

Significant
Unless
Mitigation is
Incorporated

Less Than
Significant
Impact

No Impact

c. *Substantially degrade the existing visual character or quality of the site and its surroundings?*

WHY? The proposed modifications to the City's municipal code apply to utility cabinets. No physical changes to the environment are included in the proposed project. The proposed revisions to the City's municipal code would improve height restrictions, design criteria, and other requirements in the PMC that protect visual character and quality. These changes in the PMC would allow for the greater regulation of the visual quality of telecommunications facilities and would provide incentives to install and screen utility features in a more organized and deliberate manner. The proposed changes to the PMC, as detailed in the Project Description, are intended to improve the visual character and quality of telecommunication infrastructure within the City of Pasadena. As such, the proposed municipal code revisions would not adversely impact the visual character or quality of the City.

d. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

WHY? The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. No physical changes to the environment are included in the proposed project. The only proposed PMC modification that relates to illumination is the addition of lighting restrictions for telecommunications facilities within the public right-of-way. The existing prohibition of illumination for building-mounted facilities and support structures on assessed parcels would remain unchanged. Therefore, the proposed municipal code revisions would not cause any adverse light or glare impacts.

4. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project.

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

WHY? The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, park, natural and open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

WHY? The City of Pasadena has no land zoned for agricultural use other than commercial growing areas. Commercial Growing Area/Grounds is permitted in the CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in the RS (Residential Single-Family), and RM (Residential Multi-Family) districts. The use is also permitted within certain specific plan areas.

c. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

WHY? There is no known farmland in the City of Pasadena; therefore the proposed project would not result in the conversion of farmland to a non-agricultural use.

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

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

WHY? The City of Pasadena is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source pollutants; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2007 AQMP, adopted on June 1, 2007. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the five percent annual reduction goal of the California Clean Air Act.

In addition to the region-wide AQMP, the City of Pasadena participates in a sub-regional air quality plan – the West San Gabriel Valley Air Quality Plan. This plan, prepared in 1992, is intended to be a guide for the 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

The proposed modifications to the City's municipal code apply to telecommunication equipment facilities located throughout the City. No physical changes to the environment are included in the proposed project and the proposed PMC modifications would not affect the City's goals, policies, and programs related to air quality. As such, the proposed municipal code revisions would not conflict with or obstruct implementation of the AQMP or the West San Gabriel Valley Air Quality Plan.

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

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

d. Expose sensitive receptors to substantial pollutant concentrations?

WHY? (B – D) Due to its geographical location and the prevailing offshore daytime winds, Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons the potential for adverse air quality in Pasadena is high and, largely as a result, Pasadena is located in a non-attainment area, an area that frequently exceeds national ambient air quality standards. The South Coast Air Basin (SCAB), which includes the City of Pasadena, is a designated non-attainment area for ozone (O₃), fine particulate matter (PM_{2.5}), and respirable particulate matter (PM₁₀).

The proposed modifications to the City's municipal code apply to utility cabinets located throughout the City. No physical changes to the environment are included in the proposed project and the proposed PMC modifications would not affect the City's goals, policies, and programs related to air quality. Furthermore, the proposed project would not affect any rules or regulations that protect air quality, such as the South Coast Air Quality Management District's (SCAQMD) Rule 403, which minimizes fugitive dust emitted from construction activity. Approval of the proposed PMC revisions would not generate any air pollutants and would not cause or contribute to an air quality violation. No impacts related to air quality standards, air quality violations, or concentration of criteria pollutants would occur and the proposed PMC revisions would have no impact on sensitive receptors.

e. Create objectionable odors affecting a substantial number of people?

WHY? The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. The proposed project would neither generate any odors

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	-----------

nor locate any sensitive receptors in the vicinity of odor sources. Therefore, the proposed project would have no odor-related impacts.

6. BIOLOGICAL RESOURCES. Would the project:

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

b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

c. *Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

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

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

f. *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?*

WHY? (A - F) The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. No physical changes to the environment are included in the proposed project and the proposed PMC modifications would not change any portions of the PMC that deal with biological resources, such as the City Trees and Tree Protection Ordinance, landscape requirements, and fuel modification requirements. Furthermore, the proposed project would not affect any rules or regulations of other agencies that protect biological resources, such as the California

Potentially
Significant
Impact

Significant
Unless
Mitigation is
Incorporated

Less Than
Significant
Impact

No Impact

Department of Fish and Game Code, the state and federal Endangered Species Act, and wetlands regulations. As such, the project would not affect special status species or their habitat; riparian habitat or other sensitive natural communities; wetlands; wildlife movement, wildlife corridors, or wildlife nursery sites; local policies or ordinances protecting biological resources; or habitat/natural community conservation plans. Therefore, the proposed project would have no impact on biological resources.

7. CULTURAL RESOURCES. Would the project:

- a. *Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?*

- b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

- c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

- d. *Disturb any human remains, including those interred outside of formal ceremonies?*

WHY? (A - D) The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. No physical changes to the environment are included in the proposed project and the proposed PMC modifications would not change any portions of the PMC that deal with cultural resources, such as the City's Historic Preservation Ordinance. Furthermore, the proposed project would not affect any rules or regulations of other agencies that protect cultural resources, such as the Mills Act and historic places/resources/landmark designations. As such, the project would have no impact on historic resources, archeological resources, paleontological resources, unique geologic features, or human remains.

8. ENERGY. Would the proposal:

- a. *Conflict with adopted energy conservation plans?*

WHY? The proposed municipal code amendment does not conflict with the 1983 adopted Energy Element of the General Plan. The proposed modifications to the City's municipal code apply to telecommunication facilities located throughout the City. Telecommunication facilities would remain subject to the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24).

Potentially
Significant
Impact

Significant
Unless
Mitigation is
Incorporated

Less Than
Significant
Impact

No Impact

b. Use non-renewable resources in a wasteful and inefficient manner?

WHY? The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. The proposed municipal code revisions would not affect the use of non-renewable resources.

9. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?

iv. Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?

WHY? (A.i – A.iv) The proposed modifications to the City's municipal code apply to the installation and maintenance of telecommunications facilities. No physical changes to the environment are included in the proposed project and the proposed municipal code revisions would not affect the City's building standards. Therefore, the proposed project would cause no impacts related to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, or landslides.