

City of Piedmont  
COUNCIL AGENDA REPORT

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DATE: April 19, 2021

TO: Mayor and Council

FROM: Sara Lillevand, City Administrator

SUBJECT: Consideration of a Wireless Communication Facilities Permit Application, filed by Gulf South Towers Capital Partners LLC and Rick Hirsch, for 898 Red Rock Road and of a Determination that the Project is Categorically Exempt from the California Environmental Quality Act

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RECOMMENDATION

1. By Motion, determine the wireless communication facilities (WCF) permit application to be categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15303 of the CEQA Guidelines because the proposed wireless communication facility is a single small utility structure located in a developed setting which replaces an existing telecommunications tower. No exceptions to the exemption have been identified that would make the proposal ineligible for the categorical exemption because the project's setting is not environmentally sensitive, the surrounding area is developed and urbanized, existing utilities are located at or near the proposed telecommunications tower installation, there are no unusual circumstances relating to the proposed installation, and no scenic highways, hazardous waste sites, or historical resources could be affected by the project.
2. Pass the attached resolution approving the WCF permit, as conditioned, for a 95-foot-tall telecommunications tower at 898 Red Rock Road, based on the findings and associated conditions of approval as presented (Attachment B).

EXECUTIVE SUMMARY

The application, submitted by Rick Hirsch on behalf of Gulf South Towers/GST Capital Partners, LLC, proposes to construct a 95-foot-tall telecommunications tower and associated site improvements. The proposed tower and base station includes space for up to four wireless service providers on land in the City of Piedmont Public Works corporation yard. The proposed tower will replace an existing 31-foot-tall tower (T-Mobile) in generally the same location. The project includes an approximately 6-foot-tall retaining wall along the north edge of the installation, 8-foot-tall fencing surrounding the base station equipment, and an 8-foot-tall ice bridge conduit to conceal cabling running from the base station enclosures to the proposed tower. On March 8, 2021, the Planning Commission held a public hearing and voted to recommend City Council approval of the project.

## ITEM CONSIDERATION AND HEARING PROCESS

The WCF permit application under City consideration consists of one site inside the City of Piedmont Public Works Department corporation yard. Antennas are proposed to be located on the sides of a new steel tower pole at 10-foot intervals, providing sufficient space and buffers between antennas to provide four lease areas. The radios are proposed to be installed in cabinets mounted on the ground within four fenced enclosures at the base of the new steel tower. The radios and base station equipment on the ground are proposed to be concealed in a fenced enclosure.

On February 17, 2021, the applicant held a virtual community open house for adjacent property owners on the Zoom online platform. Staff participated in the open house. No member of the public participated in the open house. According to the applicant, one adjacent neighbor contacted the applicant and requested considerations for noise during maintenance and construction of the facility.

On March 8, 2021, the Planning Commission held a public hearing on the proposed 95-foot-tall telecommunications tower. Approximately six adjacent property owners addressed the Planning Commission and expressed concerns regarding the possible visibility of the tower and possible impacts to their property values. Several speakers expressed general support for improvements to cellphone reception. Meeting minutes are provided as Attachment E to this staff report. At the conclusion of the public hearing, the Planning Commission voted to recommend that the City Council determine the project to be categorically exempt from CEQA and recommended City Council approval of the project with new conditions of approval related to concealment and painted finish.

As described in the following sections of the staff report, the WCF Permit application does not request any exceptions to WCF permit standards to comply with federal and state law, nor any other exception or variance.

## ZONING AND CODE COMPLIANCE

Wireless communication facilities, located on public land, are subject to the Piedmont Municipal Code, including the following regulations: Division 17.22 (Zone B: Public Facilities), Division 17.30 (Parking), Division 17.46 (Wireless Communication Facilities), Chapter 3 (Trees on Public Property), and Chapter 5 (Building Code). A summary of the project's compliance with City requirements is provided below.

### ***Zone B Development Regulations Division 17.22***

The City corporation yard is located in Zone B, the public facilities zone. Pursuant to Section 17.22.030, a wireless communication facility is permitted as a conditional use in Zone B. Pursuant to Section 17.22.040, there are no limits on lot area, frontage, coverage, height, setbacks, and floor area ratio, in Zone B for non-residential uses. ***Complies.***

***Zone B Parking Requirements Division 17.30***

Pursuant to Division 17.30, there are no parking requirements for wireless communication facilities beyond any standards in Division 17.46 (Wireless Communication Facilities Ordinance). Division 17.46 does not require specific parking standards. However, this Division does require that the installation protect public health, peace, and safety. Proposed GST use of the City corporation yard includes the temporary parking of maintenance trucks for each of the wireless service providers in existing parking spaces in the corporation yard. ***Complies.***

***Piedmont Municipal Code Section 17.46.040 Location*****Location within the City**

The applicants propose to construct a new WCF installation on public land in Zone B, the public facilities zone. The location preference in the City Code (section 17.46.040) is, in order of preference, (i) on publicly-owned property outside of the public right of way, in Zone B within the city, (ii) on publicly-owned facilities in any other zone outside of the public right of way, or (iii) public rights-of-way. The proposed location is within Zone B, the first preference. ***Complies.***

**Collocation Preference**

The applicant proposes to construct a new WCF installation at the base of a hill in the corporation yard and to conceal the equipment in cabinets and enclosures, as well as behind existing trees and shrubs. The applicant's stated intention is to collocate up to four wireless service providers. The location preference in the City Code (section 17.46.040) is to locate on or in an existing structure in which the wireless communication facility can be concealed, to collocate on an existing wireless communication facility, or to locate on a new structure that can be incorporated in an inconspicuous or compatible manner with the surrounding area. *Collocation* means the location of two or more wireless communication facilities on a single support structure. Collocation limits the proliferation of new antennas and associated visual clutter. The proposed new tower installation is compatible with the surrounding area, the third preference. ***Complies.***

**Site Agreement**

Pursuant to Section 17.46.040 of the Piedmont City Code, a lease agreement allowing for the use of the site in the City corporation yard has been negotiated by staff. The draft lease agreement will be considered by the City Council at a future public hearing. ***Complies.***

***Piedmont Municipal Code Section 17.46.070 Development Standards*****Collocation**

The applicants propose to construct WCF installation with lease space for four wireless service providers on a 95-foot-tall tower pole in the City corporation yard. The applicant has stated their intention to collocate with four wireless service providers and plans show space for each collocated facility, see above. ***Complies.***

**Height Limit**

The application proposes a WCF installation with a maximum height of 95 feet, excluding the additional height of the lightning rod. The height limit for wireless communication facilities in the

City Code (section 17.46.070.A.2) is 35 feet, unless the zoning district in which the wireless communication facility is located expressly provides a higher height limit. Pursuant to Section 17.22.030, a non-residential use is expressly excluded from the development standards for lot area, frontage, coverage, height, setbacks, and floor area ratio. A wireless communication facility is a non-residential use allowed in Zone B.

Pursuant to Section 17.46.070.A.2, ground-mounted wireless communication equipment, base station, antenna, pole, or tower must be the minimum functional height. According to the City's technical experts, CTC Technology & Energy ([www.ctcnet.us](http://www.ctcnet.us)), the proposed tower is the minimum functional height to provide coverage to the intended service area. In addition, according to CTC, the proposed tower at the current proposed height is the minimum functional height to provide lease space for four wireless service providers under the conditions and the topography of the site. *Complies.*

### **Screening**

The screening requirement for WCF permits in section 17.46.070.A.2 states that roof mounted equipment and antennas must be located to minimize visibility, and the proposed tower is not roof mounted. *Not applicable.*

### **Concealed or Camouflaged**

City Code section 17.46.070.A.3 states wireless communication facilities must be designed to minimize visual impacts. When feasible, the facilities must be concealed or camouflaged. The facilities must have a non-reflective finish and be painted or otherwise treated to minimize visibility and the obstruction of views. The facilities may not bear signs, other than certification, warning, emergency contacts, or other signage required by law or expressly required by the city.

According to the project plans, beacons or other lighting are not required on the proposed tower. A recommended condition of approval in the attached draft resolution requires the applicant to prepare a lighting plan for the base station enclosures prior to issuance of a building permit.

As shown on the proposed plans, cabling will be within the hollow core of the proposed tower and within an ice bridge leading from each of the base station enclosures to the tower. As conditioned in the draft resolution, a cabling plan shall be submitted with plans for the building permit, subject to staff review and approval. No spooling or coils of exposed wire are permitted on the exterior of the proposed installation.

As conditioned, the plans submitted for building permit shall show facility signage that is small and consists of safety warnings and emergency contact information, as required by state and federal law. As conditioned, the entirety of the design of the proposed tower installation shall be adequately concealed. *Complies.*

### **Public Health, Peace and Safety**

On February 1, 2021, the applicant submitted an Evaluation of Human Exposure to Radio Frequency Emissions, prepared by Global RF Solutions, consulting engineers, which analyzed the theoretical equipment schedule of 24 antennas and 36 base station radios, prepared by GST. The City's consulting engineers, CTC, reviewed the Global RF Solutions analysis and agreed with the

conclusions. According to CTC, the theoretical equipment schedule is sufficient for three of the major wireless providers, to be located at the top three lease spaces on the proposed tower. The fourth or lowest lease space at approximately 60 feet above ground level would be most likely occupied by a lower-powered antenna due to the limited effective range of a facility at the 60-foot height. Examples of low-powered antennas are emergency dispatch transmitters or a small cell wireless facility.

The Global RF Solutions report states that the project as proposed will be in full compliance with the Federal Communications Commission (FCC) regulations and guidelines limiting human exposure to radio frequency (RF) emissions. The report concludes that the exposure to electromagnetic field/radio frequency emissions from the cumulative proposed antennas on the theoretical equipment schedule would be a maximum of 15.3% of the safe exposure limits established by the FCC at 30 feet or lower anywhere on the corporation yard property. According to the report, the RF emissions on the roof of the fire truck storage structure, moved to a new location and located next to the proposed tower, is predicted to have 1.2% of the FCC public exposure limit, and the RF emissions at the corporation yard office buildings should not exceed 0.0307% of the FCC public exposure limit.

The requirement to maintain public health, peace and safety for wireless communication facilities in the City Code section 17.46.070.A.4 states that a wireless communication facility may not adversely affect the public health, peace and safety. A recommended condition of approval shall require the applicant to provide RF emissions reports for the specific equipment installed on the proposed tower and within the base station on the ground, including the cumulative emissions with all prior equipment, demonstrating compliance with federal safety standards. *Complies.*

#### **Physical Safety in the Right-of-Way**

City Code section 17.46.070.A.5 states that a wireless communication facility located in the public right-of-way may not cause: (i) physical or visual obstruction, or safety hazard, to pedestrians, cyclists, or motorists; or (ii) inconvenience to the public's use of the right-of-way. Equipment, walls, and landscaping located above grade must be at least 18 inches from the front of the curb and not interfere with the public's use of the right-of-way. The proposed installation is located on public property not within the public right-of-way. Right-of-way standards do not apply. **Not applicable.**

#### **Compliance with State and Federal Law**

City Code section 17.46.070.A.6 requires each wireless communication facility application to comply with federal and state statutes governing local agencies' land use authority regarding the siting of wireless communication facilities. The applicant has complied with all local application requirements that the City has promulgated in accordance with state and federal laws. *Complies.*

#### ***Piedmont Municipal Code Chapter 5 Building Code Requirements***

The proposed installation is subject to Chapter 5 of the Piedmont Municipal Code (Building Code) and will require a building permit prior to construction. All requirements of the Building Code must be met, including but not limited to noise limits, foundation design, construction management plan, electrical plan, structural engineering plans and calculations, etc., prior to issuance of a building permit.

## Noise

Section 5.4.11 of the Piedmont Building Code regulates mechanically generated noise sources. It states, "Machines and other devices located on the exterior of structures which generate sounds perceptible outside the perimeters of the lot on which the machine or other device is located shall be installed with such sound transmission control measures to adequately minimize or eliminate the transmission of the sound to a level not to exceed 50 decibels, A-weighted, beyond property perimeters. This section is directed to and includes, but is not limited to, pool and spa filter systems, air conditioning units, and exterior mounted blowers for exhaust systems."

Temporary emergency back-up power is a State of California requirement for wireless communication facilities. According to the applicants, each of the wireless service providers is expected to have a back-up power generator in each of the four base station enclosures. As conditioned in the attached draft resolution, the applicant shall provide a noise study prepared by a licensed acoustical engineer for the specific equipment shown on any building permit application for the GST Capital Partners Tower and any subsequent additional equipment. As conditioned, back-up power generators shall be located within the fenced enclosures, and noise levels will not inconvenience users of the City corporation yard or Coaches Field. ***Complies.***

### ***Piedmont Municipal Code Chapter 3 (Trees)***

Article IV of City Code Chapter 3, Trees, provides the regulations applicable to City trees. Pursuant to section 3.14, City Approval Required, the vegetation on public property is owned by the City of Piedmont. No person other than a City employee or other contractual agent of the City may plant, prune, treat, or remove vegetation on public property. The proposed plans show the removal of several native oak trees located adjacent to the existing T-Mobile tower. As conditioned, the applicants must obtain Public Works Director approval before removing any tree. The Public Works Director may direct the tree removal work. ***Complies, as conditioned.***

### CONFORMANCE TO DESIGN GUIDELINES AND GENERAL PLAN

Compliance with the Piedmont General Plan is a requirement of the Piedmont Design Guidelines and Wireless Communication Facilities Ordinance. The Piedmont General Plan includes policies and actions intended to preserve the residential character of the community. The City of Piedmont General Plan includes goals and policies related to wireless communication facilities, public spaces, and undergrounding of utilities.

The proposed design is consistent with the Piedmont Design Guidelines and General Plan in that the scale and mass of the communication equipment are appropriate for the City corporation yard and Zone B public land; the installation is concealed and camouflaged to blend with its surroundings; and the project satisfies the following Piedmont General Plan policies:

Piedmont General Plan Policy 35.8, "Telecommunication Services: Collaborate with telecommunication service providers to foster access to emerging communication and information technology for Piedmont residents," and

Policy 37.4, “Siting and Design of Infrastructure: Ensure that the siting and design of infrastructure facilities, including water tanks and telecommunication towers mitigate the potential for adverse visual impacts and are consistent with policies in the Design and Preservation Element.”

The following sections of the Piedmont Design Guideline would be satisfied by the proposed GST wireless communication facility, as follows:

- **3.03.01 SIGNIFICANT VIEWS**

The project is consistent with the Design Guidelines for protection of significant views because: the top of the proposed tower is lower than the homes on neighboring properties on Abbott Way, Hilltop Crescent, and Starknoll Place; the curve of the hillside and existing trees and shrubs screen and obscure the view from properties on Echo Lane and Maxwellton Road; and the tower is aligned with the crest of the adjacent hillside to the north, as viewed from properties on Alta Avenue, Scenic Avenue, and Pala Avenue to the south.

- **3.03.02 VISUAL AND ACOUSTICAL PRIVACY; ACCESS TO DIRECT OR INDIRECT LIGHT**

The project is consistent with the Design Guidelines for visual and acoustical privacy and access to direct or indirect light because the proposed tower is separated by over 330 feet from the nearest residential property. The distance from neighboring properties and the maximum width of the tower of 8 feet, will result in minimal shadowing of neighboring properties.

- **3.08 RETAINING WALLS**

The proposed retaining wall is low (approximately 6 feet tall) and intended to allow the tower and base station to be constructed as closely as possible to the existing T-Mobile tower (to be removed by the proposed tower application). The retaining wall allows a 20-foot-wide fire access road to be located along the face of the base station enclosures, leading to the City skate park beyond it.

- **3.09 FENCES AND WALLS**

The proposed project is consistent with Design Guidelines for fences and walls because the proposed 20-foot-wide by 60-foot-long chain-link-fenced enclosure (8 feet tall) is located in the City corporation yard where industrial and functional design and fencing are appropriate.

- **3.11 LANDSCAPE AND HARDSCAPE DESIGN**

The proposed project is consistent with Design Guidelines for landscape and hardscape design because, as conditioned, the Public Works Director will direct the removal of the three small oak trees located on the hillside above the existing T-Mobile tower in order to construct the base station enclosure. As conditioned, the applicant shall provide a landscape plan including the retaining wall and new plantings of native trees and shrubs to replace the removed trees, prior to issuance of a building permit. The landscape plan shall balance the new areas of hardscape with new areas of landscape appropriate for the location in the City corporation yard, near at gateway to a City park, subject to staff review and approval.

- **3.12 EXTERIOR LIGHTING**

The proposed project is consistent with Design Guidelines for exterior lighting because there is no beacon or other lighting of the tower. As conditioned exterior lighting of the ground mounted equipment shall be shielded and directed downward, subject to staff review and approval

- **4.04 MECHANICAL EQUIPMENT**

The project satisfy Design Guidelines for mechanical equipment because as conditioned the applicant shall provide noise studies prepared by a licensed acoustical engineer prior to the issuance of a building permit for the proposed facility or any subsequent building permit for the addition of new equipment.

Design Guideline 4.04.02.1, Mechanical Equipment, On-Site Aesthetic Design Compatibility, states, “Site-and ground-mounted mechanical or electrical equipment should be screened using plant materials, fencing, walls, or other approved means to shield the equipment from view.” The proposed installation includes concealment and screening devices, including a fenced enclosure for equipment, and an ice bridge and the hollow core of the tower to conceal cabling. As conditioned, antenna shall be covered with equipment shrouds to further conceal exterior mounted mechanical equipment.

Design Guideline, 4.04.02.5, Mechanical Equipment, On-Site Aesthetic Design Compatibility, states, “Utility connections should be screened or painted to blend in with the exterior materials to which they are mounted.” As conditioned, and where feasible, the equipment attached to the utility poles will be shrouded and painted a consistent color scheme.

Following review of application plans and materials, project site, and public testimony, the Planning Commission recommends that the WCF permit application, as conditioned in the attached draft resolution, is consistent with Piedmont Design Guidelines and General Plan requirements.

### CEQA COMPLIANCE

Based upon the application, plans and documentation submitted in connection with the project application, the project has been determined to be categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15303 of the CEQA Guidelines (construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures), because the proposed wireless communication facility is a single small utility structure located in a developed setting which replaces an existing telecommunications tower. No exceptions to the above exemption have been identified that would make the proposal ineligible for use of a categorical exemption because the project’s setting is not in a location that is particularly sensitive, the surrounding area is developed and urbanized, existing utilities are located at or near the proposed installation, there are no unusual circumstances relating to the proposed installation, and no scenic highways, hazardous waste sites, or historical resources could be affected by the project.



By: Pierce Macdonald-Powell, Senior Planner

ATTACHMENTS

	<u>Pages</u>	<u>Document</u>
A	32-15	Piedmont Design Guidelines Applicable To WCF Permit Application
B	16-26	Draft Resolution Recommending Approval of the WCF Permit
C	27-48	Peer Review Memo, prepared by CTC Technology & Energy
D	49-229	NEPA Compliance Report, prepared by Trileaf, July 9, 2018
E	228-231	Planning Commission Meeting Minutes for March 8, 2021

Project Application, Plans, and Materials are posted to the City website at the following link:  
<https://piedmont.ca.gov/cms/One.aspx?portalId=13659823&pageId=15671209>

The March 8, 2021 Planning Commission Staff Report is posted to the City website at the following link: <https://piedmont.ca.gov/cms/One.aspx?portalId=13659823&pageId=15671209>

For access to the project site, please contact [pmacdonald@piedmont.ca.gov](mailto:pmacdonald@piedmont.ca.gov)

## **CITY OF PIEDMONT DESIGN GUIDELINES APPLICABLE TO WCF PERMIT**

### **3.03.01 SIGNIFICANT VIEWS**

3.03.01.1 The siting and construction of a new or modified existing structure, including its site plantings at mature growth, should make all reasonable efforts to avoid adverse impacts on significant views currently available to existing nearby residences.

### **3.03.02 VISUAL AND ACOUSTICAL PRIVACY; ACCESS TO DIRECT OR INDIRECT LIGHT**

3.03.02.1 The siting of a new or modified existing structure, the location of its exterior openings, and the location of exterior mounted appliance ventilation and exhaust ports should respect the visual and acoustical privacy of the residences located on contiguous properties, including their outdoor living areas or open spaces.

3.03.02.2 The siting of a structure and its landscaping should clearly differentiate between the public right-of-way and the private space of the structure, giving the appearance that its occupants control their private space.

3.03.02.3 The siting of a structure and the openings into its rooms should discourage visual access by persons driving by in automobiles or walking along the sidewalk, yet allow for the view of the streetscape and the neighborhood by its occupants, allowing for “eyes on the street.”

3.03.02.4 The entryway to the new residence should be obvious and observable from the street.

### **3.08 RETAINING WALLS**

#### **3.08.01 NEIGHBORHOOD COMPATIBILITY**

3.08.01.1 The design of new retaining walls that are visible from the street should be consistent with the scale and proportion of existing retaining walls on contiguous parcels, except when they exceed the recommended maximum heights outlined in these guidelines.

3.08.01.2 The design of new retaining walls that are visible from the street, as well as those that are close to side and rear property lines should be no more than four feet, unless physical limitations on the site prevent this from occurring. If the change in grade is greater than four feet, a series of retaining walls, interspersed by planting areas in a stepped or terraced fashion should be constructed to create a less visually-prominent monolithic appearance.

#### **3.08.02 ON-SITE AESTHETIC DESIGN AND COMPATIBILITY**

3.08.02.1 Retaining walls should be constructed in stepped or terraced fashion with the maximum height for any single wall no more than four feet, unless physical limitations on the site or structural engineering conditions do not make terracing feasible. Any retaining wall in excess of six feet should be avoided whenever possible. The height of a retaining wall shall be measured from whichever of the following is lower:

- A. The finished grade surface of the ground, or
- B. The natural surface of the ground.

The surface of the ground for measurement purposes shall be determined by the specific plane of the proposed retaining wall.

3.08.02.2 The design of a retaining wall should be compatible with the architectural style of the residence which it serves and should provide visual variety and interest through the use of form, texture, detailing and planting. When a retaining wall contains an entry stairway to the residence, the design of the wall should give visual prominence and attention to the entryway. When a retaining wall is adjacent to a garage, the two should have a unified design. While a retaining wall should be well-designed and visually interesting, it should not call attention to itself, but instead should focus and direct attention to the residence.

### **3.08.03 SAFETY**

3.08.03.1 A retaining wall located adjacent to a driveway should not obstruct the view of a driver exiting a driveway.

## **3.09 FENCES AND WALLS**

### **3.09.01 NEIGHBORHOOD AND CONTIGUOUS PARCEL COMPATIBILITY**

3.09.01.1 The design of fences or walls should be consistent with the character of existing fences or walls in the neighborhood and on contiguous parcels, except when they exceed the recommended maximum heights outlined in these guidelines.

3.09.01.2 A fence or wall should minimize any adverse impacts on the neighborhood and on residences located on contiguous parcels. The quality of design reflected by the fence or wall should be directly related to its visual prominence.

### **3.09.02 ON-SITE AESTHETIC DESIGN AND COMPATIBILITY**

3.09.02.1 The design of a fence or wall should be compatible with the architectural style of the residence which it serves and should provide visual interest and variety. A fence or wall should be well-designed and visually interesting. It should not call attention to itself, but instead should focus and direct attention to the residence.

3.09.02.2 When a fence or wall contains an entry to the residence, its design should give visual prominence to the residence and direct attention to the entry.

3.09.02.3 Fences or walls in front yards are to be avoided except in rare circumstances. However, if a residence is located on a corner or through lot, a fence or wall greater than four feet in height should be permitted to enclose the property's private outdoor living area in the side or rear yard.

### **3.09.03 CONTIGUOUS PARCELS AND ON-SITE SAFETY**

3.09.03.3 A fence or wall located adjacent to a driveway should not obstruct the view of a driver exiting a driveway.

3.09.03.4 A fence or wall located in the side yard of a corner lot adjacent to a street should not obstruct the view of the cross street for drivers approaching the cross street.

## **3.11 LANDSCAPE AND HARDSCAPE DESIGN**

### **3.11.01 INTRODUCTION**

3.11.01.1 Landscape and hardscape surfaces are design elements that anchor structures to their surrounding terrain. Rather than being used as an afterthought to mask inappropriately positioned or designed structures, they should instead be part of a comprehensive site development design scheme and should be compatible with the design of structures found on the property.

3.11.01.2 As with additions to existing structures, additions to existing landscaping and hardscaping should provide a seamless transition to existing planting and pathway designs.

### **3.11.02 STREET FACING GARDENS IN SETBACK AREAS**

3.11.02.1 Planting designs within the street facing setback area should be compatible with those found on neighboring properties, as shown in the two photographs above.

3.11.02.2 Living plant materials should be the primary ground cover for street facing gardens within the front setback area. Planting areas consisting primarily of rock or inorganic material should be avoided, as shown in the two photographs above.

3.11.02.3 Artificial turf is not a landscaping material. As a hardscape material it does not count towards the 30% landscape minimum. The 20 ft. street setback area must be landscaped except for areas of ingress and egress. Side and rear yards offer more flexibility in the use of landscape and hardscape materials, including artificial turf.

3.11.02.4 At corner lots, where the side yard also has a street facing garden within the 20 ft. street setback, landscaping should be attractive while providing privacy for outdoor living areas.

3.11.02.5 Hardscape, or paved surfaces in street facing gardens within the street setback areas should be limited to pathways to building entrances and driveways to garage entrances. Outdoor patios and active outdoor activity areas within this setback area are discouraged. Living plant materials should be installed adjacent to these hardscape surfaces to enhance these entry pathways, as shown in the two photographs above.

### **3.11.03 ON-SITE DESIGN PRINCIPLES**

3.11.03.1 Minimize impacts on existing terrain.

3.11.03.2 Use natural drainage channels and on-site storm water drainage management opportunities.

3.11.03.3 Preserve and incorporate existing mature trees as part of the overall landscape design.

3.11.03.4 Use landscaping within side and rear setback areas to reinforce property lines and minimize the need for fencing between separate outdoor spaces.

3.11.03.5 Avoid locating structures within the drip line of existing mature trees or within riparian zones.

3.11.03.6 Rear yard gardens should provide plantings with usable open space.

3.11.03.7 When possible, use a variety of plant materials in the palette to have a layered effect of size and species. Consider the need for wind breaks, the need for shading in South

and West facing areas, while choosing plant materials conducive to sunny and shaded zones within the lot.

3.11.03.8 Use native plant species, drought tolerant or climate appropriate planting materials. Consider following Bay-Friendly Landscape Guidelines when designing your garden.

3.11.03.9 Avoid invasive plant species or flammable mulch, such as shredded redwood bark, also known as “gorilla hair.”

3.11.03.10 Consider the eventual height and width of plant materials when planting near property lines, buildings, site features, streets and sidewalks.

3.11.03.11 Use drip irrigation systems to establish newly planted materials, but choose species that will primarily survive on rainfall.

3.11.03.12 Use permeable paving as part of the hardscape materials, when possible. Pavers should be light in color with a high solar reflective index.

3.11.03.13 Consider planting strips at driveways

3.11.03.14 On-site asphalt driveway paving and on-site driveway and walkway solid white concrete paving should be discouraged. Colored concrete or pavers are recommended for on-site driveways and walkways.

## **3.12 EXTERIOR LIGHTING**

### **3.12.01 NEIGHBORHOOD AND CONTIGUOUS PARCEL COMPATIBILITY**

3.12.01.1 Limit the lighting of front yard landscape features, to respect the existing neighborhood character.

3.12.01.2 Use “Dark Sky Compliant” exterior light fixtures that are shielded and directed downwards to prevent light trespassing from a subject property to neighboring properties. The use of floodlights is discouraged.

### **3.12.02 ON-SITE AESTHETIC DESIGN, COMPATIBILITY AND SAFETY**

3.12.02.1 Complement the light fixture design with the architectural character and building elements being illuminated.

3.12.02.2 Conceal electrical boxes from public view. Conduits should not be exposed on exterior walls and should be embedded either in walls or landscaping.

3.12.02.3 Locate low level lighting to ensure entry paths, entry stairs and driveways, garage and building entries are adequately illuminated.

3.12.02.4 When used, provide motion sensors that are adjustable, to prevent them from rapidly flashing on and off when activated.

## **4.04 MECHANICAL EQUIPMENT**

4.04.02.1 On-Site Aesthetic Design Compatibility. Site-and ground-mounted mechanical or electrical equipment should be screened using plant materials, fencing, walls, or other approved means to shield the equipment from view.

4.04.02.5 On-Site Aesthetic Design Compatibility. Utility connections should be screened or painted to blend in with the exterior materials to which they are mounted.

**RESOLUTION No. \_\_\_\_\_**

**A RESOLUTION APPROVING, SUBJECT TO CONDITIONS, A  
WIRELESS COMMUNICATION FACILITIES PERMIT SUBMITTED BY  
GULF SOUTH TOWERS CAPITAL PARTNERS LLC  
FOR 898 RED ROCK ROAD, APN 048A-7002-003-03  
(APPLICATION PROJECT #21-0024)**

**WHEREAS**, Gulf South Towers Capital Partners LLC (“Applicant”), is requesting permits from the City of Piedmont (“City”) for a wireless communication facility (“WCF”) installation within the City of Piedmont Public Works corporation yard to replace an existing 31-foot-tall WCF tower, owned and operated by T-Mobile. The proposed WCF installation design includes a 95-foot-tall tower pole with up to four colocation facilities consisting of wireless antenna at 10-foot intervals and associated ground-mounted equipment within specified lease areas, a base station enclosure surrounded by an 8-foot-tall chain link fence and gates, an 8-foot-tall ice bridge conduit, retaining wall, site grading, and associated site improvements, the construction of which requires a WCF permit; and

**WHEREAS**, pursuant to Piedmont City Code sections 17.46.080 A and B, the Planning Commission reviewed the application for a WCF permit for the location at 898 Red Rock Road, at a duly noticed public hearing on March 8, 2021, and made recommendations of approval to the City Council, which is the decision-making body; and

**WHEREAS**, the equipment proposed to be installed, including the machinery in the base station enclosure, including temporary back-up power generator(s), is subject to mechanically-generated noise limits set forth in Section 1207.6 of the California Building Code, as adopted by the Piedmont City Code section 8.02.030, and subject to conditions of approval required herein to protect existing and future users of the corporation yard and Coaches Field, which is adjacent to the WCF installation; and

**WHEREAS**, based upon the evidence and after reviewing the application, project site, plans and any and all testimony and documentation submitted in connection with such application, the City Council finds in the exercise of its independent judgment that the project is categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15303 of the CEQA Guidelines (construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures), because the proposed wireless communication facility is a single small utility structure located in a developed setting which replaces an existing telecommunications tower. No exceptions to the above exemption has been identified that would make the proposal ineligible for use of a categorical exemption because the project’s setting is not in a location that is particularly sensitive, the surrounding area is developed and urbanized, existing utilities are located at or near the proposed installation, there are no unusual circumstances relating to the proposed installation, and no scenic highways, hazardous waste sites, or historical resources could be affected by the project; and

**WHEREAS**, the project is located in the City corporation yard within Zone B, the public facilities zone. Pursuant to Section 17.22.030, a wireless communication facility is permitted as a

conditional use in Zone B, and pursuant to Section 17.22.040, there are no limits on lot area, frontage, coverage, height, setbacks, and floor area ratio, in Zone B for non-residential uses; and

**WHEREAS**, based upon the evidence and after reviewing the application, project site, plans and any and all testimony and documentation submitted in connection with such application, the City Council finds that the project, as conditioned, conforms to the criteria and standards of Piedmont City Code section 17.46.080.D.1, as follows;

1. The City Code requires the Applicant to demonstrate the facilities are necessary to close a significant gap in the operator's service coverage or capacity. The Applicant has demonstrated that the facility is necessary to close a significant gap with a location justification exhibit with coverage maps; three major wireless service providers have demonstrated their desires to collocate on the proposed new tower; and the Applicant has provided the theoretical equipment schedule and power of the equipment for three major wireless service providers, for which the City has requested that a third-party engineering firm model the predicted range of the tower and theoretical equipment schedule, which shows that coverage and capacity will be improved with the proposed new tower; and
2. The Applicant has evaluated and met the priority for location standards of Piedmont City Code section 17.46.040.A.1 in that the proposed site is in Zone B;
3. The proposal satisfies each of the applicable development standards in Piedmont City Code section 17.46.070 as follows:

A. Development Standards:

1. Collocation. The proposed WCF Permit complies with development standards for collocation because the proposed installation is designed to provide lease space for four wireless service providers on a 95-foot-tall tower pole in the City corporation yard.
2. Height Limit. The WCF Permit complies with development standards for height because pursuant to Section 17.22.030, a non-residential use is expressly excluded from the development standards for height in Zone B, and the proposed tower installation is a wireless communication facility which is a non-residential use allowed in Zone B.

Section 17.46.070.A.2 requires that any ground mounted wireless communication equipment, base station, antenna, pole, or tower must be the minimum functional height. The City's technical experts, CTC Technology & Energy, have reviewed the proposed tower and determined that the current proposed height is the minimum functional height to provide lease space for four wireless service providers under the conditions and the topography of the site.

3. Concealed or Camouflaged. The proposed WCF Permit complies with development standards in City Code section 17.46.070.A.3, which states wireless communication facilities must be designed to minimize visual impacts. When feasible, the facilities must be concealed or camouflaged. The facilities must have a non-reflective finish and be painted or otherwise treated to minimize visibility and the obstruction of views. The facilities may not bear signs, other than certification, warning, emergency contacts, or other signage required by law or expressly required by the city. The proposed WCF Permit complies with this standard because of the following reasons:

- a. According to the project plans, no beacons or other lighting is required on the proposed tower. As conditioned, the Applicant shall prepare a lighting plan for the base station enclosures prior to issuance of a building permit. The lighting plans shall show foot candle measurements at ground level and shall be subject to staff review and approval.
  - b. As conditioned, the equipment and the tower structure shall be painted a consistent non-reflective color.
  - c. As shown on the proposed plans, cabling will be within the hollow core of the proposed tower and within an ice bridge leading from each of the base station enclosures to the tower. As conditioned, the Applicant shall minimize exposed cabling for each antenna, and no spooling or coils of exposed wire are permitted on the exterior of the proposed installation.
  - d. As conditioned, the plans submitted for building permit shall show facility signage that is small and consists of safety warnings and emergency contact information, as required by state and federal law.
4. Public Health, Peace and Safety. The proposed WCF Permit complies with development standards for public health, peace, and safety because on February 1, 2021, the Applicant filed a RF study demonstrating compliance with the Federal Communications Commission (FCC) regulations and guidelines limiting human exposure to radio frequency (RF) emissions, which has been reviewed and accepted by the City's consulting engineers, CTC. Furthermore the project shall comply with such requirements because conditions of approval require that prior to issuance of a building permit for the construction of the tower pole and for each subsequent permit to install telecommunications equipment, the Applicant shall provide electromagnetic field/radio frequency emissions reports for the specific equipment to be installed on the proposed tower and within the base station on the ground, including the cumulative emissions with all prior equipment, demonstrating compliance with federal safety standards. In addition, as conditioned herein, the WCF installation must comply with additional noise control measures.
5. Compliance with State and Federal Law. The proposed WCF Permit complies with City Code section 17.46.070.A.6 which requires each wireless communication facility application to comply with federal and state statutes governing local agencies' land use authority regarding the siting of wireless communication facilities, because the Applicant has complied with all City application requirements that the City has promulgated in accordance with state and federal laws, and because of the following reasons:
- a. Operation and Maintenance Standards. As conditioned, the proposed wireless communication facilities will comply with the operation and maintenance standards provided in Piedmont City Code section 17.46.070.B; and
  - b. Term of Permit. As conditioned, the approved WCF Permit will be valid for an initial period of ten years commencing on the approval date of this Resolution subject to renewals pursuant to local, state and federal law.



**B. General Plan:**

The proposed design of the WCF Permit installation is consistent with the Piedmont General Plan in that the scale and mass of the communication equipment are appropriate for the City corporation yard and Zone B public land; the installation will be camouflaged to blend with its surroundings; and the project satisfies the following Piedmont General Plan policies:

1. Piedmont General Plan Policy 35.8, “Telecommunication Services: Collaborate with telecommunication service providers to foster access to emerging communication and information technology for Piedmont residents,” because the proposed WCF Permit will foster access to emerging communication and information technology, and
2. Policy 37.4, “Siting and Design of Infrastructure: Ensure that the siting and design of infrastructure facilities, including water tanks and telecommunication towers mitigate the potential for adverse visual impacts and are consistent with policies in the Design and Preservation Element” because the location and design of the proposed WCF Permit is sensitive to the proposed setting, includes separations to neighboring property owners of over 300 feet, and is designed to be as narrow as possible.

**C. Piedmont Design Guidelines:**

The proposed WCF Permit complies with the following sections of the Piedmont Design Guidelines:

1. **3.03.01 SIGNIFICANT VIEWS.** The project is consistent with the Design Guidelines for protection of significant views because: the top of the proposed tower is lower than the homes on neighboring properties on Abbott Way, Hilltop Crescent, and Starknoll Place; the curve of the hillside and existing trees and shrubs screen and obscure the view from properties on Echo Lane and Maxwellton Road; and the tower is aligned with the crest of the adjacent hillside to the north, as viewed from properties on Alta Avenue, Scenic Avenue, and Pala Avenue to the south.
2. **3.03.02 VISUAL AND ACOUSTICAL PRIVACY; ACCESS TO DIRECT OR INDIRECT LIGHT.** The project is consistent with the Design Guidelines for visual and acoustical privacy and access to direct or indirect light because the proposed tower is separated by over 300 feet from the nearest residential property, and because the distance from neighboring properties and the maximum width of the tower of 8 feet, will result in minimal shadowing of neighboring properties. In addition, as conditioned herein, the WCF installation must comply with additional noise control measures.
3. **3.08 RETAINING WALLS.** The proposed retaining wall meets the guideline because it is low (approximately 6 feet tall) and intended to allow the tower and base station to be constructed as closely as possible to the existing T-Mobile tower (to be removed by the proposed tower application). The retaining wall allows a 20-foot-wide fire access road to be located along the face of the base station enclosures, leading to the City skate park beyond it.

4. **3.09 FENCES AND WALLS.** The proposed project is consistent with Design Guidelines for fences and walls because the proposed 20-foot-wide by 60-foot-long chain-link-fenced enclosure (8 feet tall) is located in the City corporation yard where industrial and functional design and fencing are appropriate.
5. **3.11 LANDSCAPE AND HARDSCAPE DESIGN.** The proposed project is consistent with Design Guidelines for landscape and hardscape design because, as conditioned, the Public Works Director will direct the removal of the three small oak trees located on the hillside above the existing T-Mobile tower in order to construct the base station enclosure. As conditioned, the Applicant shall provide a landscape plan including the retaining wall and new plantings of native trees and shrubs to replace the removed trees, prior to issuance of a building permit. The landscape plan shall balance the new areas of hardscape with new areas of landscape appropriate for the location in the City corporation yard, near at gateway to a City park, subject to staff review and approval.
6. **3.12 EXTERIOR LIGHTING.** The proposed project is consistent with Design Guidelines for exterior lighting because there is no beacon or other lighting of the tower. As conditioned exterior lighting of the ground mounted equipment shall be shielded and directed downward, subject to staff review and approval.
7. **4.04 MECHANICAL EQUIPMENT.** The project satisfy Design Guidelines for mechanical equipment because as conditioned the Applicant shall provide noise studies prepared by an acoustical engineer prior to the issuance of a building permit for the proposed facility or any subsequent building permit for the addition of new equipment. Regarding Design Guideline 4.04.02.1, Mechanical Equipment, On-Site Aesthetic Design Compatibility, which states, "Site-and ground-mounted mechanical or electrical equipment should be screened using plant materials, fencing, walls, or other approved means to shield the equipment from view," the proposed installation includes concealment and screening devices, including a fenced enclosure, and an ice bridge and the hollow core of the tower to conceal cabling. Regarding Design Guideline, 4.04.02.5, Mechanical Equipment, On-Site Aesthetic Design Compatibility, which states, "Utility connections should be screened or painted to blend in with the exterior materials to which they are mounted," the WCF Permit is consistent with the Guideline because, as conditioned, and where feasible, the equipment attached to the utility poles will be close-mount and painted a consistent color scheme.

**NOW, THEREFORE, BE IT RESOLVED** that the City Council that:

**SECTION 1.** The above recitals are correct and are material to this Resolution and are incorporated into this Resolution as findings of the City Council.

**SECTION 2.** Based on the findings and facts set forth heretofore, the staff report and evidence presented at the public hearings, the City Council approves the WCF Permit filed by Gulf South Towers Capital Partners, LLC, subject to conditions of approval listed herein, and subject to the successful execution of a license agreement with the City of Piedmont for use of City-owned property:

1. **Conditions in construction documents.** These conditions of approval shall be included as a sheet in the plan set submitted for any City building permit, excavation permit or encroachment permit application (“City-required construction permits”) for the work approved herein.
2. **Noise.** The Applicant shall include on the site plan, submitted for the initial building permit application, an 8-foot-tall solid wood fence enclosure at the perimeter of the chain link fence enclosure. The Applicant shall provide a noise study prepared by a licensed acoustical engineer for the specific equipment shown on any building permit application for the GST Capital Partners tower and any subsequent equipment added to the facility, including emergency back-up power generator(s). Noise study shall include cumulative noise, including the noise from existing equipment at the GST Capital Partners facility. Noise study shall demonstrate compliance with the following requirements. All equipment, including any back-up power generator, shall have noise attenuation design limiting the maximum noise level to 65 dBA, per occurrence of noise, measured at 7 meters from the equipment. Noise limits at the exterior of the corporation yard offices shall be no greater than 60 dBA, per occurrence of noise. Noise levels at the property line shall not exceed 50 dBA, pursuant to Section 1207.6 of the California Building Code, as adopted by the Piedmont City Code section 8.02.030. Back-up power generators shall only be located within the fence enclosures.
3. **Power and utility connections.** Prior to issuance of a building permit, the locations and designs of all power and utilities connections shall be shown on the site plan submitted for a building permit, subject to the review and approval of City of Piedmont Public Works Director and City Engineer. Unless use of City power utilities is permitted pursuant to the terms of a lease or site agreement, the Applicant shall be required obtain power from PG&E or other available power provider, and to install a separate utility meter for Applicant’s use. Applicant shall underground its power utilities serving the project to nearest available connection point.
4. **Lighting plan.** Prior to issuance of a building permit, the Applicant shall submit a lighting plan for the WCF Permit installation including all lighting of the tower, access roadway, gates, and base station enclosures. All lighting shall be shielded and directed downwards. A photometric plans shall be provided. Lighting plan shall be subject to staff review and approval.
5. **Design, heights of facilities and diameter of WCF Tower.** The WCF Permit tower shall have a maximum height of 95 feet as measured from the surface of the existing access road in the Piedmont corporation yard, adjacent to the existing T-Mobile facility, to the top of the tower, excluding the lightning rod. The width or diameter of the WCF tower approved herein, including any equipment mounted to the tower, shall be 8 feet maximum. Prior to issuance of a building permit for the GST Capital Partners tower or subsequent building permits to add equipment to the tower in the future, a cabling plan shall be submitted with building permit application, and it shall be subject to staff review and approval. Cables shall be concealed inside the tower pole and ice bridge. No spooling or coils of exposed wire or cables are permitted on the exterior of the proposed installation. Antennas, radios, tower, tower pole, cabinets, and equipment shall be painted a consistent non-reflective color and maintained in good repair by GST Capital Partners, to the satisfaction of the City Engineer. Fencing shall not open into the required 20-foot-wide access road adjacent to the

base station enclosure. Fencing may have gates that slide open to the side. The WCF tower facility approved herein shall have a total of 24 antennas and 36 base station radios of the general types shown in the conceptual equipment schedule. The WCF tower shall have a maximum of four RAD centers (centers of transmission) with three sectors each, corresponding to the four lease areas shown on the plans. Each of the four tower lease spaces shall have a maximum of two antennas per each of the three sectors for a maximum of six antennas at each lease space. A maximum of three remote radio units (RRUs) shall be mounted to the tower at each of the four lease spaces. Additional RRUs and other equipment must be located within the ground-level base station unless granted an exception to this condition in writing by the Planning & Building Director based on a determination that the equipment is unobtrusive in the proposed location. Antennas shall incorporate less than 10% tilt.

6. **No blasting.** Excavation for the foundation of the tower pole and construction of the retaining wall shall not be conducted with explosives of any kind.
7. **Contractor's general liability insurance.** To ensure that the contractor doing work in the City will be responsible for damages caused by the work to City property or to neighboring property, prior to issuance of any required City permits for construction the Applicant shall require all contractors performing work on the Project to maintain a General Commercial Liability policy covering bodily injury, including death, and property damage that may arise out of or result from the contractor's operations. Such insurance shall be written for not less than \$2,000,000 per occurrence. The insurance shall include an endorsement requiring 10 days prior notice to the City if the insurance is to be cancelled or changed, and the Applicant shall ensure that the contractor immediately arranges for substitute insurance coverage. If the contractor's insurance carrier states in writing that it is unable to provide the required endorsement, then the Applicant shall be responsible for providing the City with the required notice if the insurance is to be cancelled or changed. If the Applicant self-performs the installation of the facilities, the Applicant shall maintain property insurance and coverage for contractors, which is substantially equivalent to the contractor's requirement of this section.
8. **Defense of legal challenges.** If there is a third party administrative, legal or equitable action challenging the project approvals, the Applicant shall defend, indemnify, and hold harmless the City against any and all liability, fees and costs arising out of the defense, including without limitation, Applicant shall pay for all costs of City's own selected legal counsel(s). For this purpose, "City" includes the City and its elected and appointed officials, agents, officers, employees, consultants, and volunteers.
9. **Radio frequency (RF) emissions and electromagnetic fields.** Prior to issuance of a building permit for the GST Capital Partners tower and any subsequent building permit to install equipment on the tower, the Applicant shall provide RF emissions reports for the specific equipment to be installed on the tower and within the base station on the ground, including the cumulative emissions with all prior equipment, analyzed per sector, demonstrating compliance with federal safety standards. RF emissions reports shall be subject to the review and approval of City staff. Prior to final inspection, the Applicant shall provide a report summarizing the RF testing of the facility to confirm conformance with conclusions of the predicted RF emissions report filed as part of the building permit submittal.

10. **Construction Management Plan.** Prior to issuance of City required construction permits for the approved project, the Applicant or contractor shall develop a comprehensive Construction Management Plan and file it with the Public Works Director. The Construction Management Plan shall address noise, vibrations, traffic control, access to neighboring properties, parking, debris removal, dust control, sanitary facilities, site safety security, and other potential construction impacts, as well as other details involving the means and methods of completing the project, including the construction route and the days and hours permitted for excavation. Outside construction involving high levels of noise, including excavation, hammering, and pile driving, shall be limited to Monday through Saturday, from 8:30 a.m. to 4:30 p.m. Construction personnel shall be instructed to park in an area defined by the Public Works Supervisor. The plan shall specify the sequencing of demolition, grading, and construction activities. The City Public Works Director may require modifications and amendments to the Construction Management Plan throughout the course of the Project and until the Final Inspection is approved by the City.
- a. **Construction Site Control of Stormwater.** Applicant shall comply with Provision C.6 “Construction Site Control” of the Regional Water Quality Control Board, San Francisco Bay Region NPDES Permit Order No. R2-2015-0049, as subsequently amended, in order to prevent construction site discharges of pollutants and other regulated materials during construction. Prior to the issuance of a building permit, the Applicant shall submit a construction stormwater management plan prepared by a licensed Civil Engineer to achieve timely and effective compliance with Provision C.6. Permit Provision C.6.c.ii provides sources for site specific, and seasonally- and phase-appropriate, effective Best Management Practices (BMPs) that must be incorporated into the stormwater management plan.
  - b. **Continual street access for emergency vehicles.** The Construction Management Plan shall specifically address methods of providing continual street access for emergency vehicles at all times by means of a traffic control permit application submitted by the Applicant and reviewed and approved by the Public Works Director.
  - c. **Haul routes.** All equipment and vehicle haul routes shall be provided to the City for review and approval. To the extent possible, haul routes shall attempt to minimize or eliminate use of minor residential roadways. Street and pavement conditions shall be observed and documented by the City on all haul routes prior to commencement of construction. Damage or observable and unusual wear and tear to haul routes on city roadways as specified by the City shall be repaired at Applicant’s expense after Final Inspection.
11. **Maintenance of facilities.** Applicant shall obtain access from the Public Works Supervisor for each maintenance visit by tenants of the lease areas on the tower or for each visit by the tower owner, GST Capital Partners, LLC. Except for emergency maintenance needs, the maintenance of the wireless communication facility tower shall occur between 8 am and 3 pm on weekdays. The requests for access to the City corporation yard shall include contact person’s name and phone number, supervisor’s name and phone number, and type of equipment to be used.
12. **Project Security.** Applicant shall provide a performance bond or other form of security, in a form acceptable to the Director of Public Works, and in an amount sufficient to cover

the cost of restoration of the corporation yard. Applicant shall provide an estimated cost of removal and restoration in the form of a quote from a bonded and licensed contractor.

13. **Insurance.** The Applicant shall provide adequate and appropriate insurance covering the Applicant's construction, excavation, and related work involving the project, in a policy form approved by the Director of Public Works and City Attorney, and specifically covering bodily injury, property damage, products and completed operations, in an amount not less than \$2,000,000.00 per occurrence and if determined by the Director of Public Works in the Director's sole discretion that construction may involve environmental hazards, obtain and cause all contractors and subcontractors to obtain, prior to commencement of any Work, Contractors' Pollution Legal Liability and/or Asbestos Legal Liability and/or Errors and Omissions insurance (if project involves environmental hazards) with limits no less than \$1,000,000 per occurrence or claim, and \$2,000,000 policy aggregate .
14. **Height verification.** Prior to completion of the project and final inspection by the City, the Applicant shall provide the Building Official written verification by a licensed land surveyor stating that the height of the new wireless communication tower, excluding the lightning rod, is less than or equal to the height measured from grade adjacent to the tower as shown on the approved plans. If the height exceeds the approved height, then the Applicant or contractor shall immediately reduce the height of the tower until it is in compliance with the approved plan.
15. **Concealment design and project site.** The outer edge of the equipment as shown in elevation and in plan view are identified as the "project site" and "concealment strategy." Future modifications shall incorporate the highest industry standards for compact designs that minimize visibility and shall not defeat the concealment strategies outlined in these conditions of approval.
16. **Term.** The approval of the wireless communication facilities permit is valid for a term of 10 years. At the end of the term, the Applicant shall remove its equipment or apply to the City Council for a new Wireless Communication Facilities Permit to extend the term of this Wireless Communication Facilities Permit.
17. **Tree work.** The Applicant and its contractors, partners, or agents are prohibited from performing any tree work related to construction, pre-construction clearance, or on-going maintenance and operation during and after construction. Tree trimming and tree removal may only occur with the approval of the Director of Public Works.
18. **Landscape plan.** Trees proposed for removal shall be replaced on a one-to-one basis with native trees and shrubs planted elsewhere on the property, which shall be shown on a final landscape plan, prior to issuance of a building permit. Replacement tree size is subject to staff review and approval, and shall be commensurate with the size and numbers of trees to be removed, of a minimum of 24-inch box size. Applicant shall conduct any utility pole installation so that clearance pruning does not remove more than 25% of tree canopy. Final height and design of the new retaining wall and chain link fence and wood fence enclosure shall be shown on the landscape plan, subject to staff review and approval. The landscape plan shall balance the new areas of hardscape with new areas of landscape appropriate for the location in the City corporation yard, near a gateway to a City park.

**19. Operation and Maintenance Standards.** The facility shall comply with the provisions of City Code Section 17.46.070.B as follows:

- a. Contact and site information. The owner or operator of a wireless communication facility must submit basic contact and site information to the city, and notify the city within 30 days of any changes to this information, including the transfer of ownership. The contact and site information must include: (i) the name, address, email address, telephone number, and legal status of the owner of the facility, including official identification number and FCC certification, and, if different from the owner, the identity and legal status of the person or entity responsible for operating and maintaining the facility; and (ii) the name, address, email address, and telephone number of a local contact person for emergencies.
- b. Signage. The owner and/or operator must post an identification sign at each facility, including owner/operator emergency telephone numbers. The design, materials, colors, and location of the identification signs shall be subject to review and approval by the Public Works Director. If at any time a new owner or operator provider takes over operation of the facility, the new operator shall notify the Director of the change in operation within 30 days and the required and approved signs shall be updated within 30 days to reflect the name and phone number of the new wireless service provider. The colors, materials and design of the updated signs shall match those of the required and approved signs. No sign shall be greater than two square feet in size unless required by law. The facility shall not bear signs other than certification, warning, emergency contacts, or other signage required by law or expressly required by the City.
- c. Non-Interference. Each wireless communication facility must at all times comply with laws, codes, and regulations, and avoid interfering with any City property, facilities, operations, utilities, or equipment.
- d. Facility maintenance. The wireless communication facility must at all times be maintained in good repair, free from trash, debris, litter, graffiti, and other forms of vandalism. The Applicant, as landlord, must repair any damage as soon as reasonably possible, but no later than the earlier of 10 days from the time of itself becoming aware of the non-compliance or the receipt of written notification from the City. The Applicant shall provide a post-construction and an annual report with the following information: equipment model and manufacturer, frequency bandwidths, effective radiated power, and emission levels measured to nearest building(s) with a comparison to FCC safe exposure limits.
- e. Noise. A wireless communication facility must be operated to comply with Chapter 8 of the City Code and conditions of approval required herein. Should the noise emanating from the facility be found to exceed the limits provided in City Code Chapter 8 and these conditions of approval, operation of the facility shall cease immediately and shall not resume until a noise verification study prepared by a licensed acoustical engineer shows the facility's compliance with City Code Chapter 8 noise limits and conditions of approval required herein. The acoustical engineer shall be selected by the City and the cost of the engineer's services shall be paid by the Applicant.
- f. Removal. All wireless communication facility equipment must be removed within 30 days of the discontinuation of the use, and the site and other property restored to its

original, preconstruction condition. In addition, the service provider must provide the City with a notice of intent to vacate a site a minimum of 30 days before the vacation.

20. **Expiration of Wireless Communication Facilities Permit.** A building permit must be issued within one year of this approval of the City Council, or this approval shall be null and void. Upon issuance of the building permit, the Applicant shall diligently pursue construction to completion.
21. **Construction Completion Schedule.** Work on the Project, once begun, shall be promptly executed with continuous good faith and reasonable progress. Since timely completion of this Project is of the essence, the Applicant shall submit to the Public Works Director for his/her approval a Construction Completion Schedule, which will specify, in detail, the duration and percentage complete of each phase.
- a. The Construction Completion Schedule with associated construction values for each benchmark shall set forth completion dates for the following benchmarks as needed: i) Completion of Excavation; ii) Completion of Electrical; iii) Completion of Mechanical; iv) Completion of Facilities; v) Completion of Hardscaping and Landscaping; and any further construction benchmarks and conditions as may be determined by the Director of Public Works.
  - b. Before the Project begins, the Director of Public Works shall make a determination as to the reasonableness of the proposed completion dates applicable to the Project, and that determination shall constitute the “Approved Schedule” and be binding on the Applicant.

**SECTION 3.** All portions of this resolution are severable. If an individual component of this Resolution is adjudged by a court to be invalid and unenforceable, then the remaining portions will continue in effect.

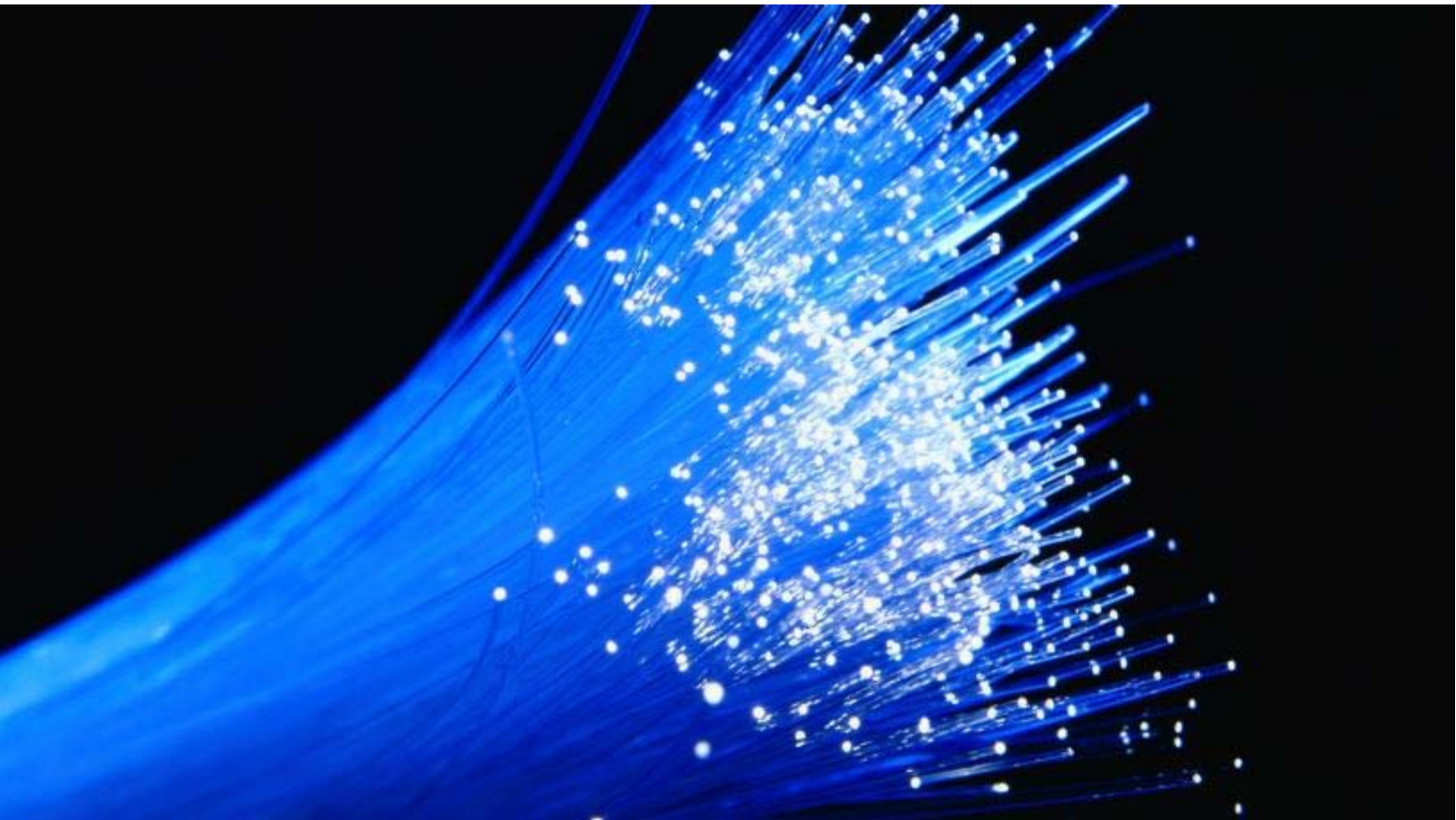
[END OF RESOLUTION]



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engineering & business consulting



## **Review of GST Monopole Application**

**Prepared for the City of Piedmont, California  
March 1, 2021**

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## 1 Introduction & Overview

CTC has been retained by the City of Piedmont to perform an independent communications engineering review of the application for a new multi-client wireless communications monopole tower by GST Capital Partners (GST), located at the Piedmont City Yard at 898 Red Rock Road.

As a part of our review, a detailed analysis was performed to determine the level of radio frequency energy in areas around the proposed tower to ensure that the proposed facility is fully compliant with Federal Communications Commission (FCC) Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields (pursuant to OET Bulletin 65 Edition 97-01).<sup>1</sup> We also evaluate the feasibility that three additional carriers can reasonably operate on this proposed monopole.

We find the application to be fully compliant with the FCC's RF energy exposure requirements. We recommend the City require that any future applications for modification of the facility (e.g., colocation by additional carriers, attachment of new antennas, increased power output) be contingent upon submission of an RF emission study documenting the site's continued compliance with the FCC's requirements.

From this proposed monopole and based on the topology of the area, we modeled the expected coverage across the spectrum T-Mobile is using and find that while the mid-band spectrum (1900-2500 MHz) will only really improve areas to the north and west of the tower, the lower-band spectrum (600-850 MHz) should improve coverage throughout most of Piedmont both in vehicles and to a lesser extent in buildings as well.

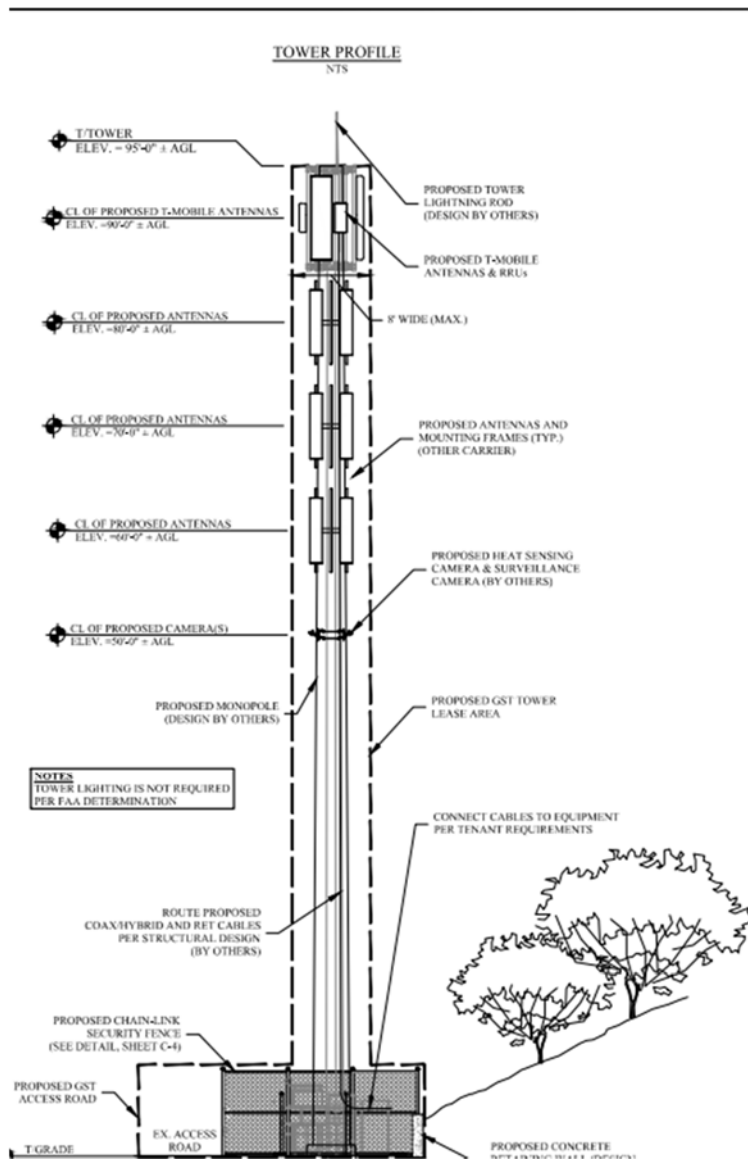
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<sup>1</sup> Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields, OET Bulletin 65, edition 97-01, FCC Office of Engineering & Technology. Washington, D.C. 20554, [https://transition.fcc.gov/Bureaus/Engineering\\_Technology/Documents/bulletins/oet65/oet65c.pdf](https://transition.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet65/oet65c.pdf).



Figure 2 is an engineering drawing submitted by GST illustrating the mounting of the wireless panel antennas. In order to minimize visual clutter, there are no traditional antenna cross arms or platforms at 10' intervals for panel mounting. Instead, the panels will be mounted close to the monopole with the associated cabling contained within the monopole. This will reduce the visual capture area, making the structure less prominent. However, with this design, there are trade-offs using the direct pole mounting, since it reduces the number of antennas and the bearing sitings that can be accommodated. Since the tower is less than 200 feet tall and not in the area of an airport glide path, there is no requirement to have lighting on the tower.

**Figure 2: Monopole Antenna Mounting**



### 3 Independent Radio Frequency Exposure Analysis

The applicant's documentation included an engineering study of radio frequency (RF) emissions prepared by Global RF Solutions, an engineering consulting firm. That study calculated the general public's expected level of RF exposure from T-Mobile's proposed antennas in the vicinity of the proposed facility and found that it would be within the FCC's allowable exposure limits.

We have independently reviewed the GST engineering drawings and find the design to be fully consistent with industry deployment practices. Further, we reviewed the Global RF Solutions study and concur with its findings. Our independent analysis concluded the following:

- The proposed T-Mobile antenna configuration<sup>3</sup> will have a maximum effective radiating power (ERP) of less than 59 kW. Using the FCC's RF emission guidelines, we calculate that those antennas' RF emissions will exceed the public exposure limit at 90 feet above ground level (i.e., the mounting height of the antenna) to a distance of less than 145 feet from the monopole structure.

Figure 3: Google Earth Photo of Site with 150-Foot Circle (below) is a Google Earth photo illustrating that there are no multi-story structures (i.e., locations at the same height as the T-Mobile antennas) within 150 feet of the site where an individual might be exposed to radiation that exceeds the FCC's public exposure guidelines.

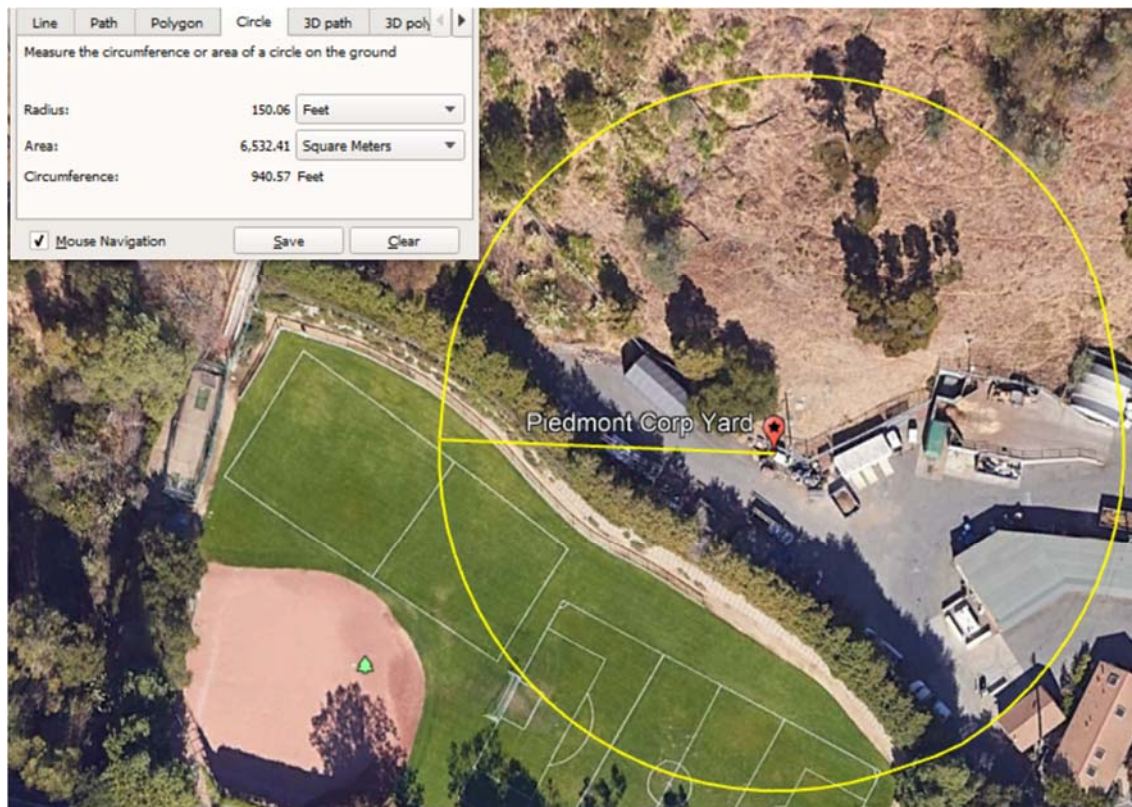
- The total calculated RF emissions from the proposed T-Mobile antennas at 6 feet above ground level within 145 feet of the monopole base will be less than 5 percent of the FCC's public exposure limit. This reduction in radiation exposure is due to the characteristics of the proposed antennas, which target RF radiation outward from the antenna and simultaneously suppress radiation in the downward direction.
- The proposed T-Mobile antennas' vertical beamwidth pattern indicates that the signal power intensity is at least 13 dB (which equates to 1/20<sup>th</sup> of the linear power intensity) below the radiation in the horizontal plane. That is, the calculated downward radiation from the T-Mobile antennas mounted at 90 feet above ground level will not exceed 1.15 kW.

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<sup>3</sup> We recommend each new wireless tenant be required to submit an RF emission study per FCC OET Bulletin 65 to demonstrate the facility's full aggregate compliance.

- Figure 4: Typical 65° Beamwidth Radiation Pattern for Applicant's Proposed Low-Band Antenna Panel (below) is the typical horizontal and vertical radiation pattern for the proposed T-Mobile antennas.
- If three other wireless carriers (i.e., for a total of four carriers) were to install current-generation antennas and remote radio transmission equipment similar to the proposed T-Mobile equipment on this proposed monopole, the maximum aggregate ERP of the four carriers' facilities would be 104 kW.<sup>4</sup> This assumes the antennas would be mounted at regular vertical intervals and that each of the antennas' beam sectors were centered at 150°, 230°, and 290°.

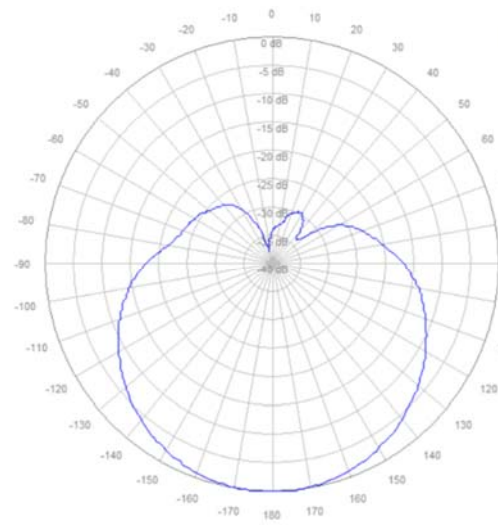
**Figure 3: Google Earth Photo of Site with 150-Foot Circle**



<sup>4</sup> We assume a maximum of 15 kW per future carrier using all licensed low-band and mid-band wireless spectrum.

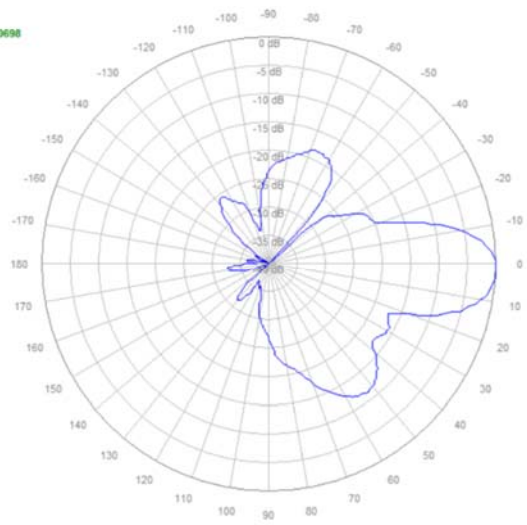
Figure 4: Typical 65° Beamwidth Radiation Pattern for Applicant's Proposed Low-Band Antenna Panel<sup>5</sup>

**Horizontal Plane Radiation Bearing 180°**



■ (0) JAHH-65A-R3B\_Port 1 +45\_020T\_0698

**Vertical Plane**



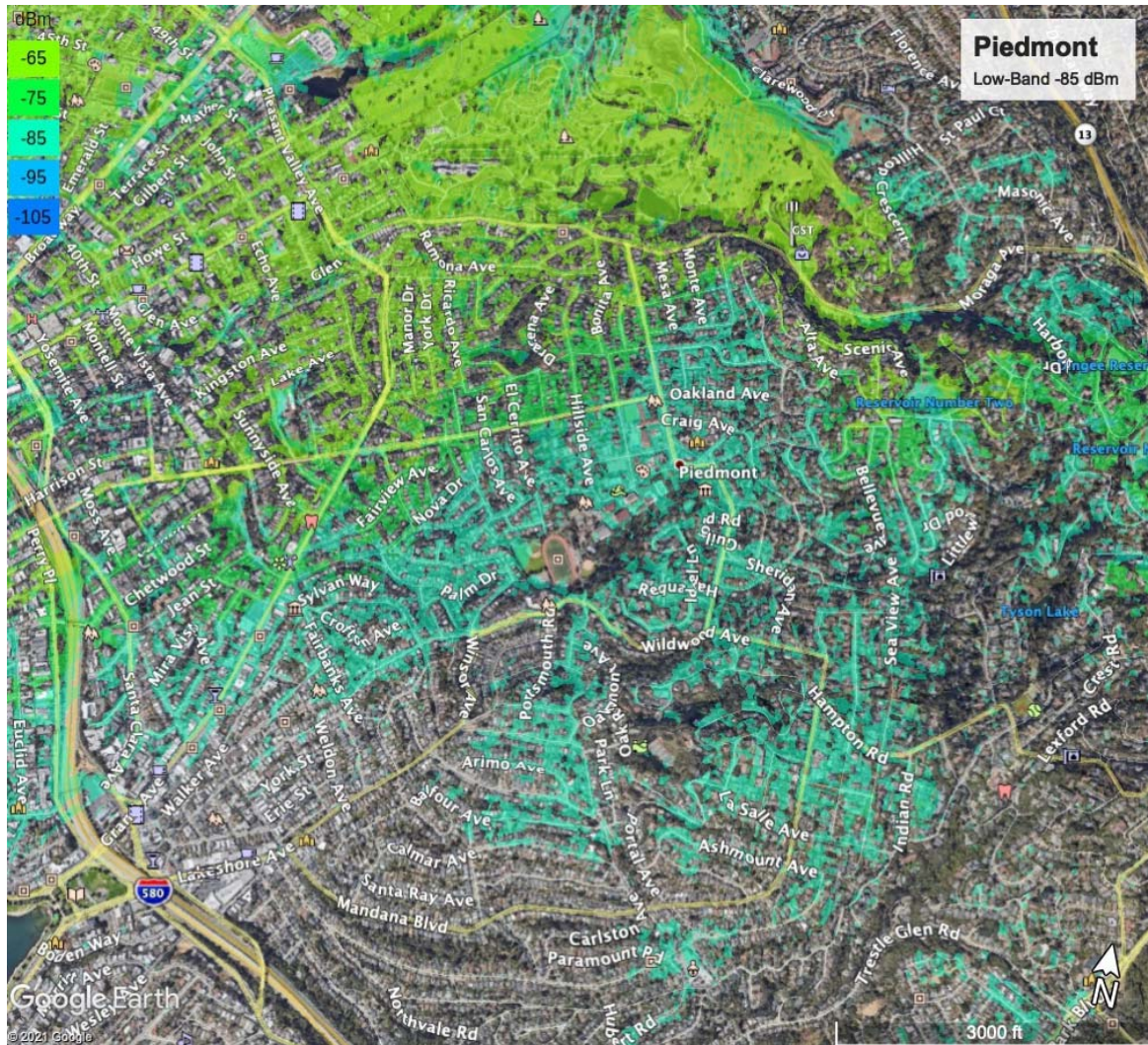
<sup>5</sup> CommScope NHH-65B multi-band panel antenna



### 4 Calculated Coverage LTE Coverage

The following maps provide estimated coverage from the site for antenna mounted at the top level (90' radiation center). Coverage maps have been calculated for the low-band (600-850 MHz) and mid-band (1900 – 2500 MHz) wireless spectrum. Plots for citywide and expanded Moraga Ave and Highway 13 coverage.<sup>6</sup> While the models show the mid-band coverage is really only improved in the areas west and north of the proposed tower, the low-band coverage is improved throughout much of Piedmont, both in buildings (-85 dBm or greater) and in vehicles (-95 dBm or greater), as far east to the intersection of Moraga Avenue and Highway 13.

Figure 5: Low-Band Coverage for In-Building Service



<sup>6</sup> Irregular Terrain Radio Frequency Propagation Model configured for an urban environment with 95% or greater coverage. Assuming respectfully, signal intensities of - 85 dBm or greater for inbuilding coverage and -95 dBm or greater for in-vehicle.

Figure 6: Mid-Band Coverage for In-Building Coverage

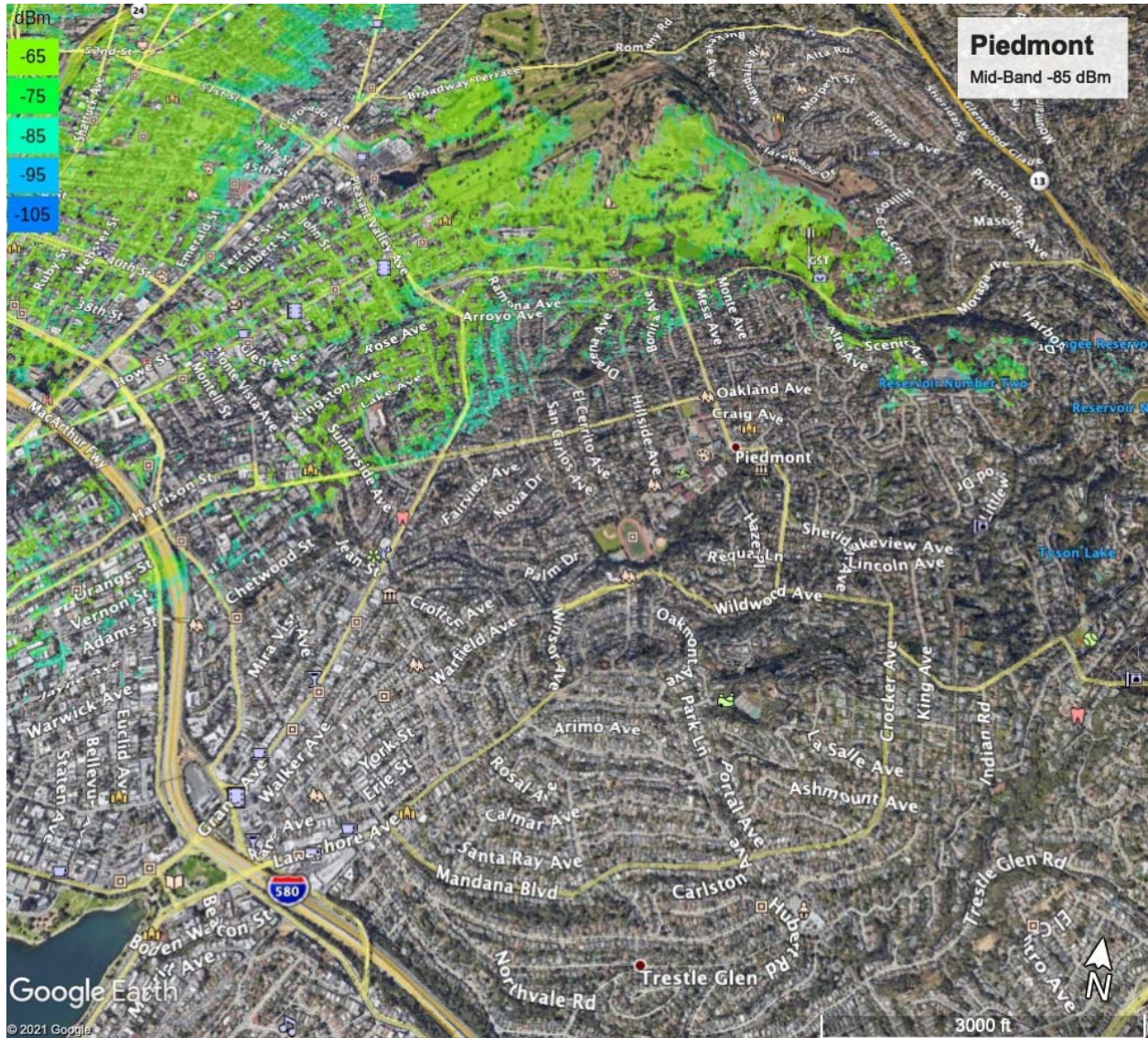


Figure 7: Low-Band In-Vehicle Coverage

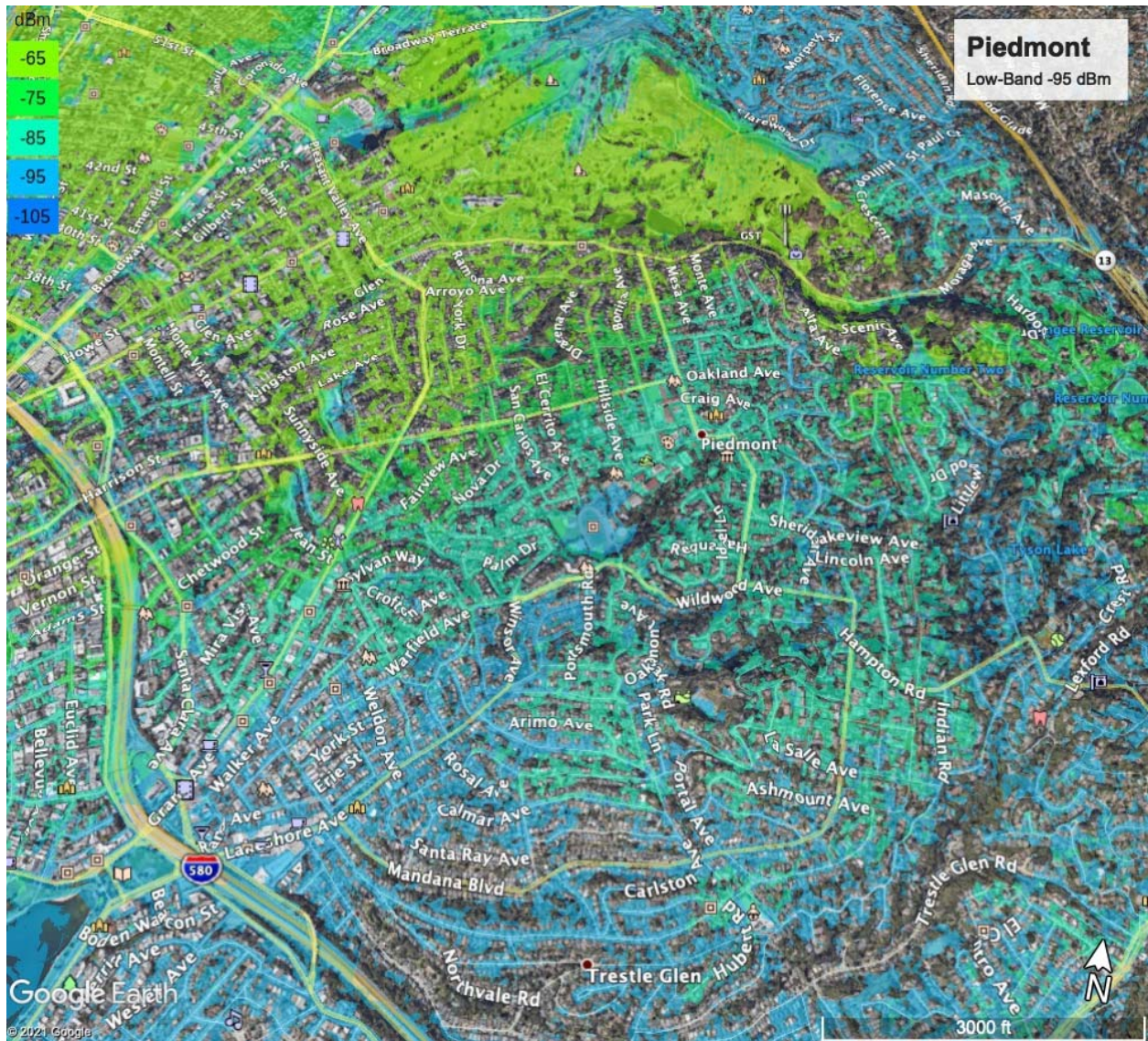
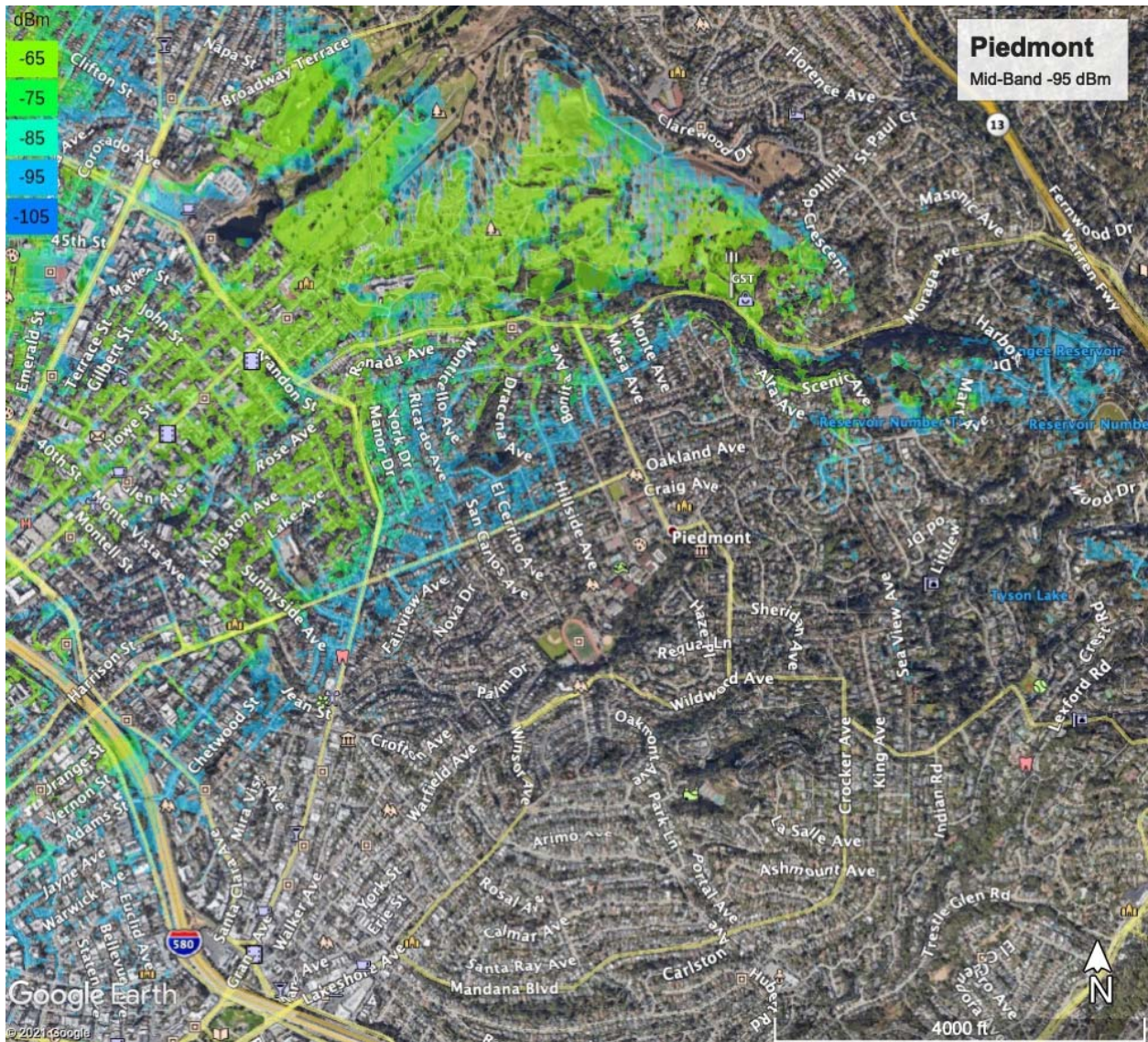


Figure 8: Mid-Band In-Vehicle Coverage





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**Rapport utfärdad av ackrediterat provningslaboratorium**  
*Test report issued by an Accredited Testing Laboratory*

Ackred. Nr 1761  
 Proving  
 ISO/IEC 17025

## EMF Test Report: Ericsson AIR 6449 B41 NR (FCC)

<b>Document number:</b>	GFTL-20:000076 Uen Rev B	<b>Date of report:</b>	2020-03-17
<b>Testing laboratory:</b>	Ericsson EMF Research Laboratory  Ericsson AB SE-164 80 Stockholm Sweden	<b>Company/Client:</b>	Peter Cullblom  Ericsson AB Blåfjällsgatan 4 SE-164 80 Stockholm Sweden
<b>Tests performed by:</b>	Fatemeh Ghasemifard	<b>Dates of tests:</b>	2020-03-17 (Rev B)  Updating the test results for a higher output power from the radio.
<b>Manufacturer and market name(s) of device:</b>	Ericsson AIR 6449 B41		
<b>Testing has been performed in accordance with:</b>	FCC OET Bulletin 65 IEC 62232:2017		
<b>Test results:</b>	RF exposure compliance boundaries (exclusion zones) related to the limits in FCC 47 CFR 1.1310 to be included in the Customer Product Information (CPI) for Ericsson AIR 6449 B41.		
<b>Additional information:</b>			
<b>Signature:</b>	Test Engineer    <hr/> Fatemeh Ghasemifard Experienced Researcher Fatemeh.ghasemifard@ericsson.com Tel: +46 10 714 94 69	Quality Manager    <hr/> Christer Törnevik Senior Expert – EMF and Health christer.tornevik@ericsson.com Tel: +46 10 714 12 35	

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## Summary of EMF Test Report<sup>1</sup>

### Equipment under test (EUT)

Product name	AIR 6449 B41		
Product number	KRD 901 141/1, KRD 901 141/11		
Supported bands, Tx frequency range (MHz) and standards	B41 (2500)	2496–2690	NR
Duplexing technology and fraction of downlink transmission time to total time	TDD (75%)		
Exposure environment	General public/uncontrolled, Workers/controlled		
EIRP <sup>2</sup> (dBm) and IEC 62232 installation class [4]	78.6	E+	

### Results

RF exposure compliance boundaries, outside of which the exposure is below the general public (GP) and workers (W) exposure limits, are listed below.

Dimensions of the box-shaped compliance boundary for general public (GP) and workers (W) exposure for AIR 6449 applicable in the markets employing the FCC RF exposure limits for maximum output power with power tolerance and TDD downlink duty cycle included.

Mode and output power for AIR 6449					Dimensions of the box-shaped compliance boundary (m)							
					Distance in front of EUT		Width		Height		Distance behind EUT	
Band	Standard	Maximum nominal output power from the radio	Power tolerance	TDD DL duty cycle	GP	W	GP	W	GP	W	GP	W
B41	NR	320 W	1.0 dB	75 %	26.8	12.0	31.9	14.3	13.8	6.2	0.2	0.2

For the power levels specified in the table which include tolerances, and the upward rounding of compliance boundary dimensions to the nearest decimeter, the specified results are conservative.

<sup>1</sup> This page contains a summary of the test results. The full report provides a complete description of all test details and results.

<sup>2</sup> The stated EIRP value is the maximum total EIRP with the TDD downlink duty cycle and without power tolerance included and are obtained using the antenna patterns provided by the client.

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## 1 General information

The test results presented in this report define compliance boundaries for AIR 6449 B41. Outside of these compliance boundaries, the radio frequency (RF) exposure levels are below the limits specified by the Federal Communications Commission (FCC) [1]. The tests were performed by calculations in accordance with the Ericsson RF exposure calculation procedure for base stations [2], which is in conformity with the FCC OET Bulletin 65 [3] and IEC 62232:2017 [4].

It should be noted that the test results presented in this test report are valid for the frequency range specified in Table 1, for the antenna properties specified in Table 2, and for the power level, the power tolerance and TDD downlink duty cycle specified in Table 3. These data as well as the applied antenna pattern files were supplied by the client and may affect the validity of the results.

Proposed EMF health and safety information for inclusion in the Customer Product Information (CPI) is provided in Appendices A, B and C.

## 2 Equipment under test

Table 1 and Table 2 below summarize the technical data for the equipment under test (EUT) and the properties of the integrated antenna. Table 3 lists the maximum nominal output power from the radio unit (total peak power from all antenna branches) and the total time-averaged power delivered to the antenna for the specified configuration. The total time-averaged power delivered to the antenna includes output power tolerance and TDD downlink duty cycle.

The EUT related data in Tables 1-3 were supplied by the client.

**Table 1 Technical data for the EUT.**

<b>Product name and product number</b>	AIR 6449 B41	KRD 901 141/1 KRD 901 141/11	
<b>Supported bands, Tx frequency range (MHz), and standards</b>	B41 (2500)	2496–2690	NR
<b>Antenna</b>	KRE 105 299		
<b>Dimensions, H × W × D (mm)</b>	841 x 522 x 211		
<b>Duplexing technology and fraction of downlink transmission time to total time</b>	TDD (75 %)		
<b>Exposure environment</b>	General public/uncontrolled, Workers/controlled		
<b>EIRP<sup>2</sup> (dBm) and IEC 62232 installation class [4]</b>	78.6	E+	

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**Table 2 Properties of the antenna.**

Product number	KRE 105 299 <sup>3</sup>
Type	Internal AAS
Number of polarizations	2
Gain <sup>4</sup> (dBi)	24.8
Horizontal HPBW <sup>5</sup> (degrees)	12.5°
Vertical HPBW <sup>5</sup> (degrees)	7.5°
Number of antenna elements ( $N_H, N_V$ )	(8, 12)
Element separation distance ( $\Delta_H, \Delta_V$ ) (mm)	(59, 66)
Maximum scan range in horizontal plane (degrees)	±60°
Maximum scan range in vertical plane (degrees)	±5°

**Table 3 EUT configurations with nominal peak output power levels and total time-averaged power levels including an output power tolerance and TDD downlink duty cycle.**

Band	Standard	Nominal peak output power from the radio (dBm/W)	Power tolerance (dB)	TDD downlink duty cycle	Total time-averaged power delivered to antenna (dBm/W)
B41	NR	55.1 / 320	1.0	75 %	54.8 / 302.1

### 3 Exposure conditions

The EUT is intended to be installed on roof-tops, masts, walls, poles and similar structures making it possible to ensure that the general public has no access to the EMF compliance boundary. Other installation related exposure conditions are not reasonably foreseeable for the EUT.

Different factors, such as beam scanning in elevation and azimuth, RBS utilization, and scheduling time are reasonably foreseeable and will significantly reduce the time-averaged power and the RF exposure. These factors were, however, not considered in this assessment, which adds to the conservativeness of the obtained compliance boundaries.

### 4 EMF compliance boundary calculations

The RF exposure was evaluated using calculations performed according to the Ericsson RF Exposure Calculation Procedure for Base Stations [2], which conforms to FCC OET Bulletin 65 [3] and IEC 62232 [4]. The calculations were made using the far-field spherical formula. The first step in calculating the compliance boundary was to use the spherical far-field formula to estimate power density:

$$S_{\text{sph}}(\theta, \phi) = \frac{P_a G(\theta, \phi)}{4\pi r^2},$$

where  $S$ ,  $P_a$ ,  $G$ ,  $r$ ,  $\theta$ , and  $\phi$  denote the power density, the total time-averaged power accepted by antenna, the antenna gain, the distance from the antenna, and the angular variables in a spherical coordinate system, respectively.

<sup>3</sup> Four antenna modules (KRE 105 299/1, KRE 105 299/2, KRE 105 299/3, KRE 105 299/4) form the complete antenna [5].

<sup>4</sup> The stated gain value is the maximum gain of the antenna within the tested frequency range.

<sup>5</sup> The stated half-power beam widths are for the broadside beam in the reference direction  $(\theta, \phi) = (96^\circ, 0^\circ)$ .



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The total time-averaged power delivered to the antenna include tolerances and the TDD downlink duty cycle. The envelope of antenna gains for all possible traffic beams was obtained from far-field measurements provided by the client. Such envelope patterns were provided for three different frequencies, specifically 2496 MHz, 2593 MHz, and 2690 MHz within Band 41. Maximum gain value corresponding to the maximum of all envelope traffic beam patterns was used in the above equation to estimate power density. The maximum gain value of the envelope traffic beams was found to be 24.8 dBi.

The compliance distance for the spherical model,  $CD_{sph}(\theta, \phi)$  was obtained by solving the following equation for  $r$ :

$$\frac{S_{total,sph}(r, \theta, \phi)}{S_{gp,w}^{lim}} = 1,$$

where  $S_{gp,w}^{lim}$  denotes the FCC power density reference levels for general public and workers exposure. RF EMF exposure limits are given in Table 4.

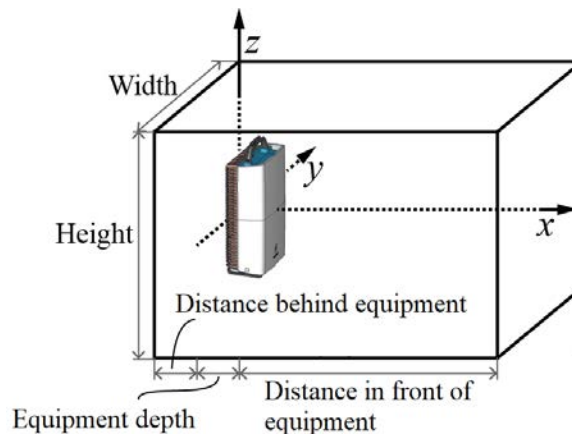
**Table 4 RF EMF exposure limits on power density for the frequency band used by the EUT [1].**

Band	$S_{gp}^{lim}$ (W/m <sup>2</sup> )	$S_w^{lim}$ (W/m <sup>2</sup> )
B41 (2500)	10	50

Based on the calculated compliance distances, a box-shaped compliance boundary was determined. To comply with the FCC requirement of a minimum test separation distance for a non-portable device of 20 cm, the minimum distance from the EUT to the compliance boundary was set to 20 cm.

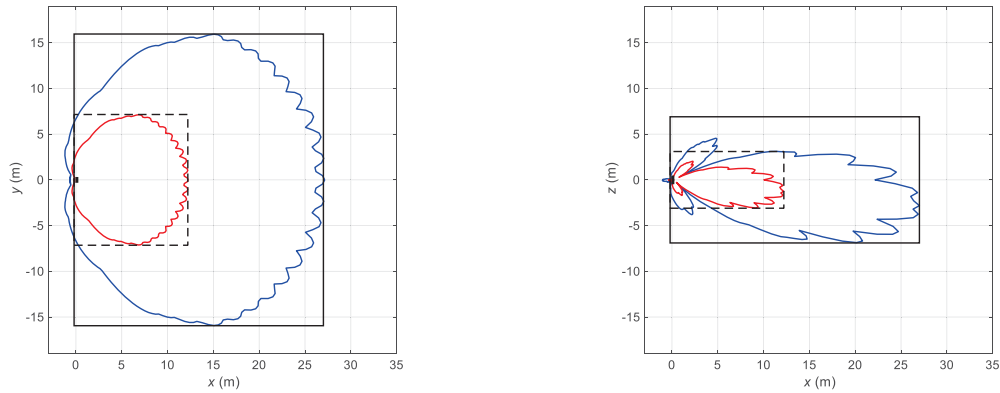
## 5 Results

A box-shaped compliance boundary is used, characterized by its width, height, and the compliance distances behind and in front of the EUT, see Figure 1. Outside of this box, the RF exposure is below the exposure limits.



**Figure 1 Box-shaped structure specifying the compliance boundary for the tested RBS product.**

In Figure 2, the compliance distance results for general public (blue line) and workers (red line) exposure are given for the tested configuration leading to the largest compliance boundary. The results are provided for the FCC exposure limits. Also shown are the resulting compliance boundaries (black lines, solid for general public, dashed for workers exposure). The resulting compliance boundary dimensions are given in 5 rounded upwards to the nearest decimeter.



**Figure 2 Compliance boundaries for general public (black solid line) and workers (black dashed line) exposure for the markets where the FCC exposure limits apply. The blue solid lines correspond to compliance distance results for general public exposure obtained using the spherical models. The solid red lines indicate the corresponding compliance distance results for workers exposure. The antenna is shown from above (left) and from the side (right) with its backplane located at  $x = 0$  m. Mode: B41 (2500 MHz) (NR). Total time-averaged power delivered to the antenna: 54.8 dBm.**

**Table 5 Dimensions of the box-shaped compliance boundary for general public (GP) and workers (W) exposure for AIR 6449 applicable in the markets employing the FCC exposure limits for maximum output power with power tolerance and TDD downlink duty cycle included.**

Mode and output power for AIR 6449					Dimensions of the box-shaped compliance boundary (m)							
					Distance in front of EUT		Width		Height		Distance behind EUT	
Band	Standard	Maximum nominal output power from the radio	Power tolerance	TDD DL duty cycle	GP	W	GP	W	GP	W	GP	W
B41	NR	320 W	1.0 dB	75 %	26.8	12.0	31.9	14.3	13.8	6.2	0.2	0.2

For the power levels specified in the table which include tolerances, and the upward rounding of compliance boundary dimensions to the nearest decimeter, the specified results are conservative.

## 6 Uncertainty

For the input parameters defined in the test report, the calculated compliance boundary dimensions determined according the approach described in Section 4 results in an exposure assessment which is conservative. The compliance boundary dimensions were determined by comparing the evaluated RF exposure directly with the limits.

## 7 Conclusion

The Ericsson AIR 6449 B41 has been tested using methods and procedures specified in FCC OET Bulletin 65 [3] and IEC 62232:2017 [4]. The results in Section 5 show the compliance boundary dimensions for the considered configuration of the product. Outside of these compliance boundaries, the RF exposure is below the limits specified in [1].

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## 8 References

- [1] FCC, Code of Federal Regulations CFR title 47, part 1.1310 "Radiofrequency radiation exposure limits", Federal Communications Commission (FCC), August 1997.
- [2] Ericsson, GFTE-16:001718 Uen, "Ericsson RF exposure calculation procedure for base stations".
- [3] FCC, "Evaluating compliance with FCC guidelines for human exposure to radiofrequency electromagnetic fields. OET Bulletin 65. Edition 97-01." Federal Communications Commission (FCC), Office of Engineering and Technology, August 1997.
- [4] IEC 62232:2017, "Determination of RF field strength, power density and SAR in the vicinity of radiocommunication base stations for the purpose of evaluating human exposure", June 2017.
- [5] Ericsson, 2/1056-KRE 105 299 Uen, "Requirement Specification for Antenna Modules of AIR 6449, RF-part".
- [6] Ericsson, LME-12:001904 Uen, "Exposure to radio frequency electromagnetic fields".

## 9 Revision history

Rev.	Date	Description
A	2020-01-27	First revision.
B	2020-03-17	Second revision. Updating the test results for a higher output power from the radio.

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## Appendix A. Information to be included in the CPI

Table A.1 below lists the compliance boundaries (exclusion zones), outside of which the RF EMF exposure from AIR 6449 is below the limits applicable in:

- USA (47 CFR 1.1310)

Information is provided for the theoretical maximum exposure condition.

**Table A.1 Dimensions of the box-shaped compliance boundary for general public (GP) and occupational (O) exposure for AIR 6449 applicable in the markets employing the FCC exposure limits.**

Mode and output power for AIR 6449						Dimensions of the box-shaped compliance boundary <sup>(1)</sup> (m)							
						Distance in front of equipment		Width		Height		Distance behind equipment	
Band	Standard	Maximum nominal output power from the radio	IEC 62232 Installation class	Power tolerance	TDD DL duty cycle	GP	O	GP	O	GP	O	GP	O
B41	NR	320 W	E+	1 dB	75 %	26.8	12.0	31.9	14.3	13.8	6.2	0.2	0.2

(1) The compliance boundaries are determined for maximum output power with power tolerance and TDD downlink duty cycle included.

## **Appendix B. Guidelines on how to install the product**

The Ericsson AIR 6449 B41 product (KRD 901 141/1, KRD 901 141/11) shall be installed to make sure that the general public does not have access to the applicable RF EMF compliance boundary. The compliance boundary dimensions were determined for the product transmitting in free space.

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## **Appendix C. Guidelines for workers during installation, maintenance, and repair of the product**

If work needs to be performed within the compliance boundary applicable for workers, the radio equipment shall be powered off, or the power be reduced to a level ensuring that the RF EMF exposure is below the relevant exposure limit for workers.

If work is conducted on behalf of Ericsson, minimum EMF related requirements are provided in [6].



# NEPA Report

July 9, 2018



## Piedmont Corp Yard

CA2016003

898 Red Rock Road

Piedmont, CA 94611

Trileaf # 639072

Prepared For:

**GST Capital Partners, LLC**

330 Marshall Street, Suite 300

Shreveport, LA 71101

Prepared By:

**Trileaf Corporation**

1051 Winderley Place, Suite 201

Maitland, FL 32751

## NEPA Report Summary

**Site Name/Location:**

Piedmont Corp Yard / CA2016003 / Trileaf # 639072  
 898 Red Rock Road, Piedmont, CA 94611  
 Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W

**Project Description:**

GST Capital Partners, LLC is proposing the construction of a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area.

**1. Is the facility located in an officially designated wilderness area? [47 CFR 1.1307 (a)(1)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Site Reconnaissance
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Review of 7.5-Minute USGS Topographic Map (Appendix B)
			National Wilderness Preservation System Website (www.wilderness.net)

**2. Is the facility located in an officially designated wildlife preserve? [47 CFR 1.1307 (a)(2)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Site Reconnaissance
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Review of 7.5-Minute USGS Topographic Map (Appendix B)
			US Fish & Wildlife Service National Wildlife Refuge System Map (Appendix B)

**3. Will the facility: (i) affect listed threatened or endangered species or designated critical habitats; or (ii) jeopardize the continued existence of any proposed endangered or threatened species; or is it likely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973? [47 CFR 1.1307 (a)(3)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Site Reconnaissance
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Review of US Fish & Wildlife Service Critical Habitat and Federally Listed Endangered Species (Appendix D)
			Informal Biological Assessment (Appendix D)

**4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing on the State or National Registers of Historic Places? [47 CFR 1.1307 (a)(4)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Site Reconnaissance
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Cultural Resource Investigation (Appendix E)
			State Historic Preservation Office Section 106 Review (Appendix E)

**5. Will the facility affect an Indian religious site? [47 CFR 1.1307 (a)(5)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Site Reconnaissance
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Correspondence with Native American Tribes via FCC TCNS (Appendix F)
			Review of Bureau of Indian Affairs Indian Reservation Map (Appendix B)

**6. Will the facility be located in a "floodplain"? [47 CFR 1.1307 (a)(6)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Review of FEMA Flood Map (Appendix B)
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Panel #06001C0080G, Zone X, August 3, 2009

**7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)? [47 CFR 1.1307 (a)(7)]**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Site Reconnaissance
<input type="checkbox"/>	<input checked="" type="checkbox"/>		Review of 7.5-Minute USGS Topographic Map (Appendix B)
			Review of US Fish & Wildlife Service National Wetlands Inventory Map (Appendix B)
			Review of USDA NRCS Web Soil Survey Map (Appendix B)

**8. Will the antenna tower or supporting structure be equipped with high intensity white lights and located in a residential neighborhood, as defined by the applicable zoning law?**

<b>Yes</b>	<b>No</b>	<b>Data Sources:</b>	Construction Drawings (Appendix A)
<input type="checkbox"/>	<input checked="" type="checkbox"/>		It is assumed that clients will not utilize high intensity white lights in residential areas



\_\_\_\_\_  
Signature

\_\_\_\_\_  
Kimberly Grimwood  
Name

\_\_\_\_\_  
July 9, 2018

\_\_\_\_\_  
Date

\_\_\_\_\_  
Trileaf Corporation  
Company



# NEPA Report

## Introduction

Trileaf Corporation (Trileaf) completed a NEPA Review for the above-referenced GST Capital Partners, LLC (GST) site. The purpose of a NEPA Review is to comply with the National Environmental Policy Act (NEPA) of 1969. Trileaf performed extensive research by consulting with appropriate state and federal agencies and reviewing readily available published lists, files, data, and maps to provide our clients with a complete NEPA document. The following summarizes the scope of work Trileaf performed in accordance with the Federal Communications Commission's (FCC's) rules implementing NEPA (47 CFR Section 1.1307 (a) (1) through (8) to determine whether any of the below listed FCC special interest items would be affected by the proposed action. Referenced materials are included as attachments, where applicable and available.

GST is proposing the construction of a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project site is located at approximately 898 Red Rock Road, Piedmont, CA 94611 at 37° 49' 55.15" North latitude and 122° 13' 46.94" West longitude.

During Trileaf's site reconnaissance, it was observed that the site is currently located within an asphalt paved parking area.

## 1. Will the facility be located in an officially designated wilderness area?

Trileaf reviewed the USGS 7.5-minute topographic map titled "Oakland East" Quadrangle, California, and information from the National Wilderness Preservation System (NWPS) (<http://www.wilderness.net>) to determine if the site is located within an officially designated wilderness area.

There are currently 149 officially designated wilderness areas in the State of California. The closest wilderness area to the project site is the Phillip Burton Wilderness Area, which is located approximately 27 miles west-northwest of the project site.

Based on this review, the project site is not located within an officially designated wilderness area.

## 2. Will the facility be located in an officially designated wildlife preserve?

Trileaf reviewed the USGS 7.5-minute topographic map titled "Oakland East" Quadrangle, California, and information from the National Wildlife Refuge (NWR) System (<http://www.fws.gov/refuges>) to determine if the site is located within an officially designated wildlife preserve or refuge.

Based on this review, the project site is not located within an officially designated wildlife preserve or refuge. A copy of the NWR System map is located in Appendix B.

**3. Will the facility (i) affect listed threatened or endangered species or designated critical habitat; or (ii) likely jeopardize the continued existence of any proposed endangered or threatened species or likely result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973?**

The Endangered Species Act (ESA) of 1973 (16 U.S.C. §§ 1536), as amended, protects endangered and threatened species and the ecosystems upon which they depend. As interpreted and implemented by 50 CFR 402, Section 7 of the ESA directs Federal agencies, in consultation with and with the assistance of the Secretary of the Interior, to utilize their authorities to further the purposes of the ESA. It also requires every Federal agency to ensure that any action it authorizes, funds or carries out, is not likely to jeopardize the continued existence of any endangered or threatened species or results in the destruction or adverse modification of critical habitat.

On April 23, 2018, a Trileaf representative visited and photographed the project site to conduct an Informal Biological Assessment (IBA). In addition, Trileaf reviewed the United States Fish and Wildlife Service (USFWS) critical habitat information and determined that the site is not located within designated critical habitat. Based on the results of our assessment, impacts to listed and/or proposed, threatened and endangered species or critical habitats resulting from the proposed action are not anticipated. Therefore, Trileaf determined that the proposed project site will have “no effect” on the species, their habitats, or designated critical habitats. Copies of the IBA and critical habitat review are located in Appendix D.

**FEDERAL**

On May 14, 2018, Trileaf reviewed the Section 7 Consultation guidance set forth by the USFWS – Pacific Southwest Region. According to guidance dated December 6, 2013, projects “do not require a Federal action agency to obtain written concurrence from the Service if they determine that their proposed action will not affect listed species or critical habitat”. Agency concurrence with a no effect determination is not required under the Endangered Species Act and will not be provided by the USFWS Pacific Southwest Region. Therefore, as Trileaf determined the project would have no effect on listed or proposed threatened or endangered species or critical habitats, no further consultation with the USFWS was required. A copy of the USFWS’ Section 7 guidance is located in Appendix D.

**4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or are eligible for listing, in the National Register of Historic Places?**

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is contained in, on, or within the viewshed of a building, site, district, structure, or object, significant in American history, architecture, archaeology, engineering, or culture, that is listed, or eligible for listing on the National Registers of Historic Places, or located in or on an Indian Religious Site.

A search of the *National Historic Landmarks* (NHL), *National Register of Historic Places* (NRHP), *State Historic Preservation Office* (SHPO) files, and a field survey was conducted by Ms. Michelle Noble, Secretary of Interior-qualified Archaeologist contracted by Trileaf through NWB Environmental Services, LLC, to identify any cultural resources within the area of direct effects and within a 0.50-mile radius for visual effects.

One historic resource was identified within the Area of Potential Effects (APE) for direct effects, and one eligible historic property was identified within the APE for visual effects. Additionally, the identification process did not locate archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs. Documentation of these reviews was submitted to the SHPO via Form 620 on May 22, 2018. The SHPO concurred that the proposed undertaking would have no direct or visual effects on historic properties in a response letter dated June 29, 2018. A copy of the SHPO concurrence letter, Form 620, and associated documents are located in Appendix E.

On April 13, 2018, Mr. Pierce Macdonald-Powell, senior planner for the City of Piedmont Public Works Department, was notified of the proposed project and invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether the department is interested in consulting further on the proposed project. On April 16, 2018, Mr. Macdonald-Powell informed Trileaf the Mountain View Cemetery to the west of the Property is considered a historical resource. He added that Section 8 of the General Plan contains further information on possible historical resources in the area. Mr. Macdonald-Powell had no other comments regarding historic properties in the vicinity of the Property. Additionally, a legal notice regarding the proposed telecommunications tower construction was posted in *The Piedmonter* on April 20, 2018. No comments from the legal notice have been received by Trileaf. Copies of the correspondence and legal notice are located in Appendix E.

#### **NATIONAL SCENIC TRAILS**

On October 5, 1999, the Cellular Telecommunications Industry Association, Personal Communications Industry Association, Appalachian Trail Conference, American Hiking Society, and representative Managing and Supporting Trails Organizations (MSTOs) for the National Scenic Trails signed a resolution for the Siting of Wireless Telecommunications Facilities Near National Scenic Trails. This resolution states that if a wireless telecommunications or site management company plans a new or significantly expanded facility within one mile of a National Scenic Trail, it will notify the non-profit group that supports the trail.

In order to determine if the site is located within one mile of a National Scenic Trail, Trileaf reviewed information from the National Park Service (NPS) National Trails System created by the National Trails System Act of 1968.

Based on this review, the project site is not located within 1 mile of a National Scenic Trail. A copy of the trails map is located in Appendix B.

#### **5. Will the facility affect any Indian religious sites?**

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is located in or on an Indian Religious Site.

On April 17, 2018, Trileaf submitted project information through the Tower Construction Notification System (TCNS) to the FCC who initiated contact with the tribes on April 20, 2018. As of July 4, 2018, all tribes have confirmed clearance either directly or by default via the FCC referral process. Trileaf determined that the subject Property is not located on or near a Native American Religious or Sacred Site. However, if archaeological remains or resources are unearthed during construction activities, Trileaf recommends that the client stop construction and notify our office immediately. Tribal consultation documentation and associated correspondence is located in Appendix F.

#### 6. Will the facility be located in a floodplain?

Trileaf reviewed the relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel #06001C0080G, dated August 3, 2009, to determine if the project was located within the 100-year floodplain.

Trileaf determined that the property is located in Zone X, areas determined to be outside the 500-year floodplain. Therefore, the project site is not located within a 100-year floodplain. A copy of the FEMA FIRM showing the project site location is located in Appendix B.

#### 7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)?

Trileaf determined through site reconnaissance, review of the relevant USGS 7.5-minute topographic map titled "Oakland East" Quadrangle, California, and review of the relevant USFWS National Wetlands Inventory Map (<http://www.fws.gov/wetlands/Data/Mapper.html>) that there are no federally designated wetlands on or in the immediate vicinity of the proposed project site.

Trileaf's site assessment did not reveal any evidence of potential wetlands or hydrophytic vegetation located on or in the immediate vicinity of the project site. Additionally, a review of the United States Department of Agriculture (USDA) Soil Survey (<http://websoilsurvey.sc.egov.usda.gov>) did not indicate hydric soils at the project site.

Based on this review, no designated wetland areas were located within the vicinity of this project and no significant changes in surface features resulting from the proposed undertaking are anticipated. Copies of the soil map and wetlands map are located in Appendix B.

#### 8. Zoning/High Intensity White Lights/Radio Frequency

As a standard practice, GST does not construct facilities requiring high intensity white lights that are to be located in residentially zoned neighborhoods. According to GST, high intensity white lights will not be used for towers less than 500 feet in height.

## Conclusion

A NEPA Review of the proposed undertaking was performed by Trileaf Corporation in conformance with the FCC rules and regulations for implementing NEPA; 47 CFR 1.1301 to 1.1319.


Based on data obtained during the Site visit, consultation with government agencies, and a review of readily available information from other sources, the preparation and filing of an Environmental Assessment will not be required and no further NEPA-related action is required for the proposed undertaking.

## Qualifications



---

Kimberly Grimwood  
Project Scientist II



---

Patrick Marchina  
Project Manager

**Appendix A**  
**Site Plans**



# PIEDMONT CORPORATE YARD

898 Red Rock Road  
Piedmont, CA 94611

Site ID: CA2016003

Lat: 37.83188

Long: -122.2295



Gulfsouth Towers, LLC  
GST Capital Partners, LLC  
330 Marshall Street  
Suite 300  
Shreveport, LA 71101  
T 318.302.4830  
www.gulfsouthtowers.com

Client: \_\_\_\_\_



Meridian Management LLC  
785 Oak Grove Road E2  
Suite 251  
Concord, CA 94518  
T 707.592.5924  
www.meridian.management

Project Architect: \_\_\_\_\_

Site Agent: \_\_\_\_\_

90% Zoning Drawings

Drawing Phase: \_\_\_\_\_

PIEDMONT CORPORATE YARD  
898 Red Rock Road  
Piedmont, CA 94611

Site Name: \_\_\_\_\_

Professional Seal: \_\_\_\_\_

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Rev.	Date	Description
01	01/16/18	Zoning Dwgs 90%

Project No.: \_\_\_\_\_

Date: 01/16/18 Job No.: \_\_\_\_\_

Scale: AS SHOWN CAD File: \_\_\_\_\_

Designed By: JG Checked: RB

## TITLE SHEET

Sheet Title: \_\_\_\_\_

# T.1

Sheet No.: \_\_\_\_\_

## APPROVALS

GULF SOUTH CONSTRUCTION	SIGNATURE: _____	DATE: _____
GULF SOUTH RF ENGINEER	SIGNATURE: _____	DATE: _____
GULF SOUTH EQUIPMENT ENGINEER	SIGNATURE: _____	DATE: _____
GULF SOUTH REAL ESTATE	SIGNATURE: _____	DATE: _____
GULF SOUTH TRANSPORT	SIGNATURE: _____	DATE: _____
GULF SOUTH CONSTRUCTION	SIGNATURE: _____	DATE: _____
GULF SOUTH LEASING	SIGNATURE: _____	DATE: _____
GULF SOUTH ZONING	SIGNATURE: _____	DATE: _____
PROPERTY OWNER	SIGNATURE: _____	DATE: _____
OTHER (IF APPLICABLE)	SIGNATURE: _____	DATE: _____

## SITE INFORMATION

**OWNER:** WALMART REAL ESTATE BUSINESS TRUST  
2001 S.E. 10TH STREET  
BENTONVILLE, AR 72716

**APPLICANT:** GULFSOUTH TOWERS, LLC  
GST CAPITAL PARTNERS, LLC  
330 MARSHALL STREET  
SUITE 300  
SHREVEPORT, LA 71101  
T (318) 302-4830

**APN:** 022-29-016

**SITE ADDRESS:** 898 RED ROCK ROAD  
PIEDMONT, CA 94611

**GROUND ELEV.:** \_\_\_\_\_

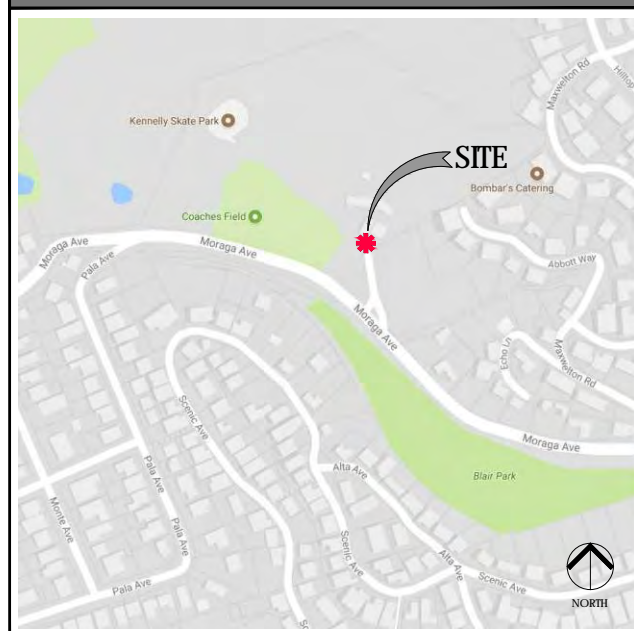
**LATITUDE:** \_\_\_\_\_

**LONGITUDE:** \_\_\_\_\_

**ZONING:** \_\_\_\_\_

**ZONING JURISDICTION:** CITY OF PIEDMONT PLANNING DEPARTMENT  
PIERCE MACDONALD-POWELL, SR. PLANNER

## VICINITY MAP



## PROJECT TEAM

**AGENT**  
GULFSOUTH TOWERS, LLC  
GST CAPITAL PARTNERS, LLC  
330 MARSHALL STREET  
SUITE 300  
SHREVEPORT, LA 71101  
T (318) 302-4830

**SITE ACQUISITION**  
Meridian Management LLC  
Concord, CA 94518  
www.meridian.management  
LEASING AGENT: CHAD AVARIAN

**ARCHITECT/ENGINEER**  
Meridian Management LLC  
Concord, CA 94518  
www.meridian.management  
PROJECT MANAGER: RODNEY BARNES  
cell: 707.592.5924  
email: rodney@meridian.management

## PROJECT DESCRIPTION

THIS IS AN UNMANNED TELECOMMUNICATIONS FACILITY FOR GULF SOUTH WIRELESS CONSISTING OF THE INSTALLATION AND OPERATION OF ANTENNAS AND ASSOCIATED EQUIPMENT ON A EXISTING BUILDING

SCOPE OF WORK

## DRAWING INDEX

SHEET NO.	SHEET TITLE
T.1	TITLE SHEET
C.1	SITE SURVEY
A.1	OVERALL SITE PLAN
A.2	ANTENNA PLAN ENLARGEMENTS BUILDING/ANTENNA ISOMETRIC
A.3	ELEVATIONS
A.4	ELEVATIONS

## APPROVALS

CONSTRUCTION WORKS AND MATERIALS MUST COMPLY WITH ALL APPLICABLE NATIONAL, STATE, AND LOCAL CODES AS ADOPTED BY LOCAL JURISDICTION, INCLUDING BUT NOT LIMITED TO:

- 2016 CALIFORNIA BUILDING CODE, TITLE 24 PART 2
- 2016 CALIFORNIA ADMINISTRATIVE CODE, TITLE 24 PART 1
- 2016 CALIFORNIA ELECTRICAL CODE, TITLE 24 PART 3
- 2016 CALIFORNIA MECHANICAL CODE, TITLE 24 PART 4
- 2016 CALIFORNIA PLUMBING CODE, TITLE 24 PART 5
- 2016 CALIFORNIA ENERGY CODE, TITLE 24 PART 6
- 2016 CALIFORNIA FIRE CODE, TITLE 24 PART 9
- ANSI/TIA.222.G
- 2016 NFPA 101. LIFE SAFETY CODE
- 2016 NFPA 72. NATIONAL FIRE ALARM CODE
- 2016 NFPA 13. SPRINKLER CODE
- CITY/ COUNTY ORDINANCES

## DRIVING DIRECTIONS

**DIRECTIONS FROM SFO:**

1. GET ON I-680 S FROM YGNACIO VALLEY RD AND N BROADWAY
2. HEAD NORTHEAST ON MITCHELL DR TOWARD OAK GROVE RD
3. TURN RIGHT ONTO OAK GROVE RD
4. TURN RIGHT ONTO YGNACIO VALLEY RD
5. TURN LEFT ONTO N CIVIC DR
6. USE THE LEFT 2 LANES TO TURN LEFT ONTO N BROADWAY
7. USE THE MIDDLE LANE TO TURN RIGHT ONTO RUDGEAR RD
8. USE THE LEFT 2 LANES TO TURN LEFT TO MERGE ONTO I-680 S TOWARD SAN JOSE
9. FOLLOW I-680 S TO SAN RAMON VALLEY BLVD IN SAN RAMON. TAKE EXIT 31 FROM I-680 S
10. MERGE ONTO I-680 S
11. TAKE EXIT 31 TOWARD ALCOSTA BLVD/DUBLIN
12. DRIVE TO ALCOSTA BLVD
13. USE THE LEFT LANE TO TURN LEFT ONTO SAN RAMON VALLEY BLVD
14. USE THE LEFT 2 LANES TO TURN LEFT ONTO ALCOSTA BLVD (SIGNS FOR I-680/SAN JOSE/SACRAMENTO)
15. TURN RIGHT AFTER VILLAGE PARKWAY

**ACCESSIBILITY REQUIREMENTS**  
FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. HANDICAPPED ACCESS NOT REQUIRED IN ACCORDANCE WITH CALIFORNIA BUILDING CODE

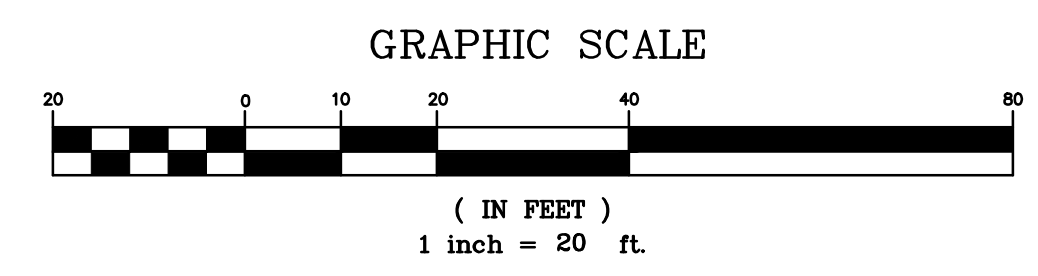
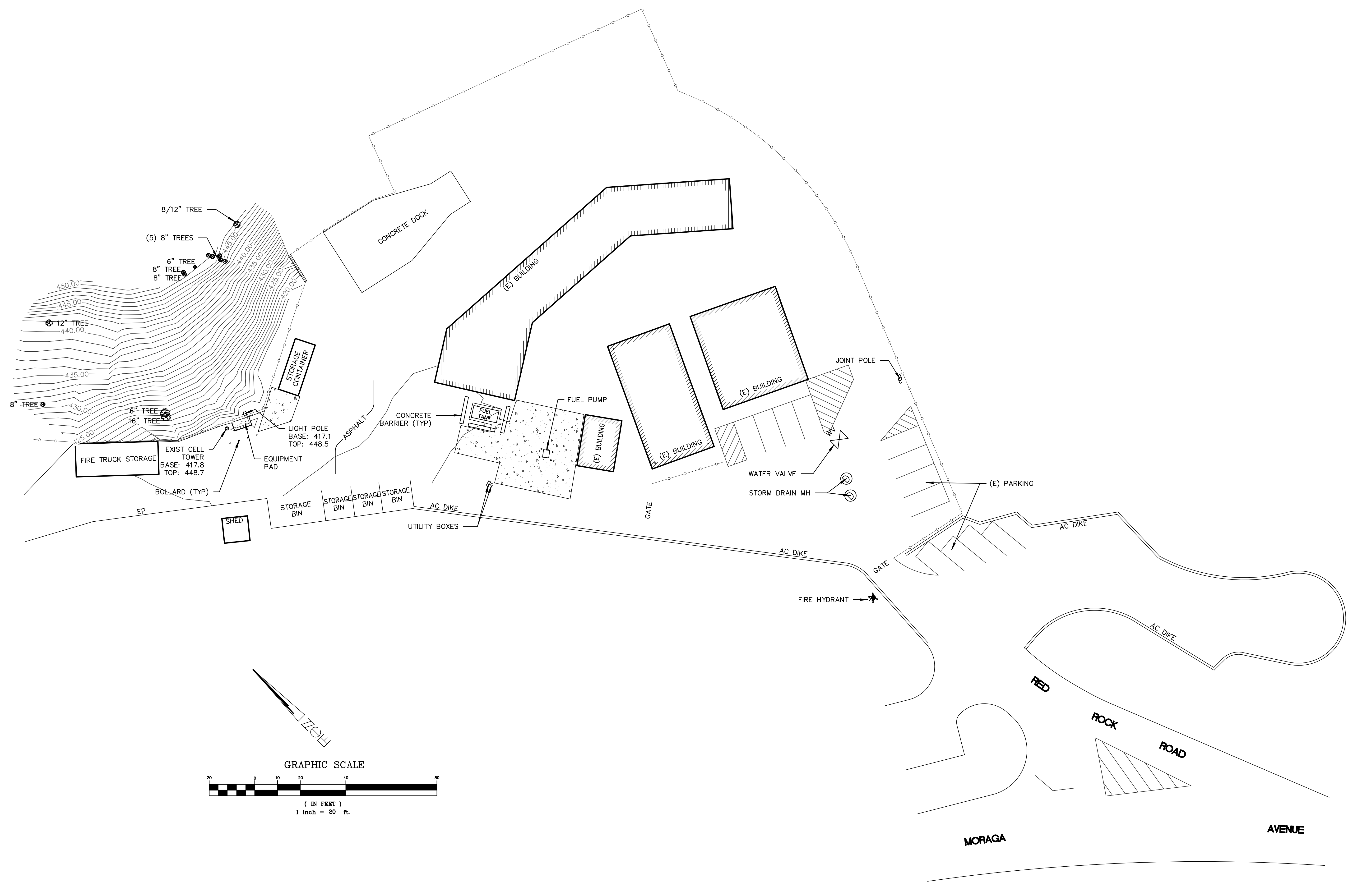


**UNDERGROUND SERVICE ALERT**  
CALL TOLL FREE  
**1.800.227.2600**  
THREE WORKING DAYS BEFORE YOU DIG

## ADMINISTRATIVE REQUIREMENTS

CONTRACTOR SHALL VERIFY ALL PLANS & (E) DIMENSIONS & CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME IF USING 11"X17" PLOT, DRAWINGS WILL BE HALF SCALE

# SITE OVERVIEW MAP



**LEGEND**

	FENCE
	AC DIKE
	CONCRETE SLAB

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LICENSED LAND SURVEYOR  
 DANIEL E. HOAGLAND  
 L.S. #8621  
 STATE OF CALIFORNIA

*Tom Hoagland*

REVISIONS	
NO.	DESCRIPTION
1	ISSUED FOR REVIEW

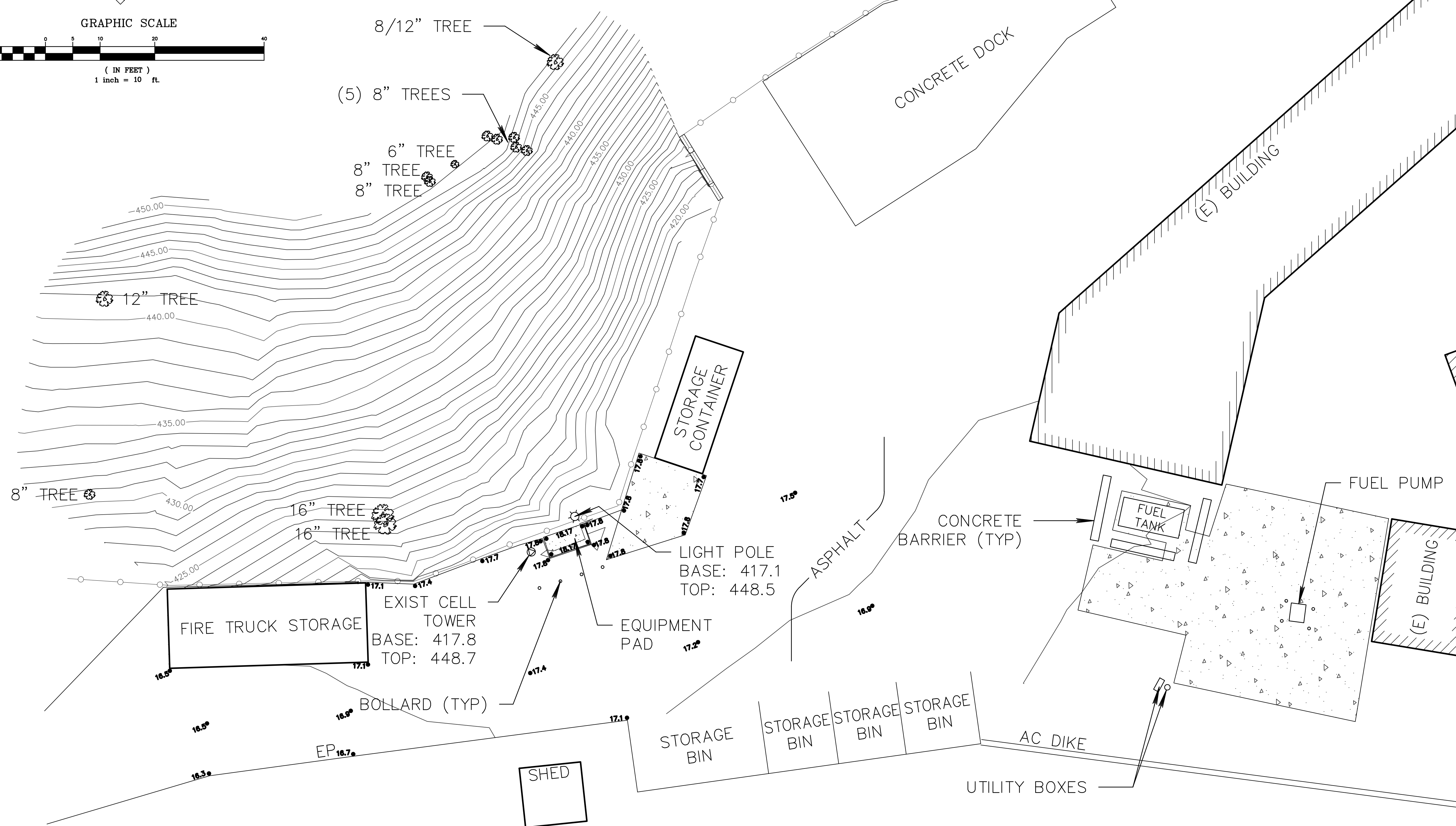
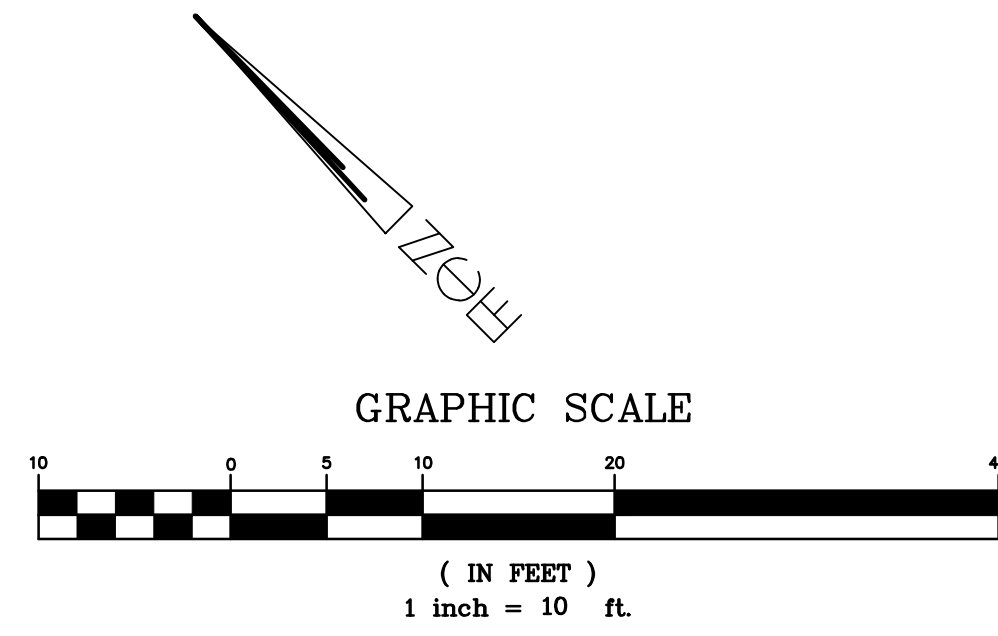


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 PIEDMONT CORP YARD  
 NEAR 898 RED ROCK ROAD  
 PIEDMONT, CA 94611

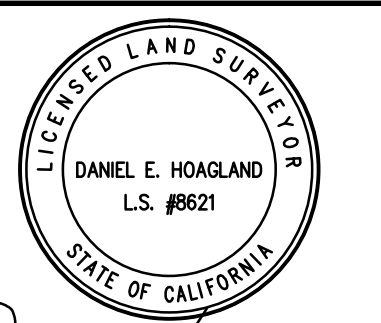
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 JOB NO.    17-058-PIEDMONT  
 SHEET NO.    C-1



**SITE DETAIL MAP**



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*Dan Hoagland*

REVISIONS	
NO.	DESCRIPTION
1	08/08/17 ISSUED FOR REVIEW



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 NEAR 898 RED ROCK ROAD  
 PIEDMONT, CA 94611

**LEGEND**

	FENCE
	AC DIKE
	CONCRETE SLAB
	SPOT ELEVATION

DRAWN: JEB DATE: 08/07/17  
 JOB NO. 17-058-PIEDMONT  
 SHEET NO.

C-2



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 GST Capital Partners, LLC  
 330 Marshall Street  
 Suite 300  
 Shreveport, LA 71101  
 T 318.302.4830  
 www.gulfsouthtowers.com

Client:



Project Architect:

Site Agent:

90% Zoning Drawings

Drawing Phase:

**PIEDMONT  
 CORPORATE YARD**  
 898 Red Rock Road  
 Piedmont, CA 94611

Site Name:

Professional Seal:

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Rev.	Date	Description
01	01/16/18	Zoning Dwgs 90%

Project No.:

Date: 01/16/18 Job No.:

Scale: AS SHOWN CAD File:

Designed By: JG Checked: RB

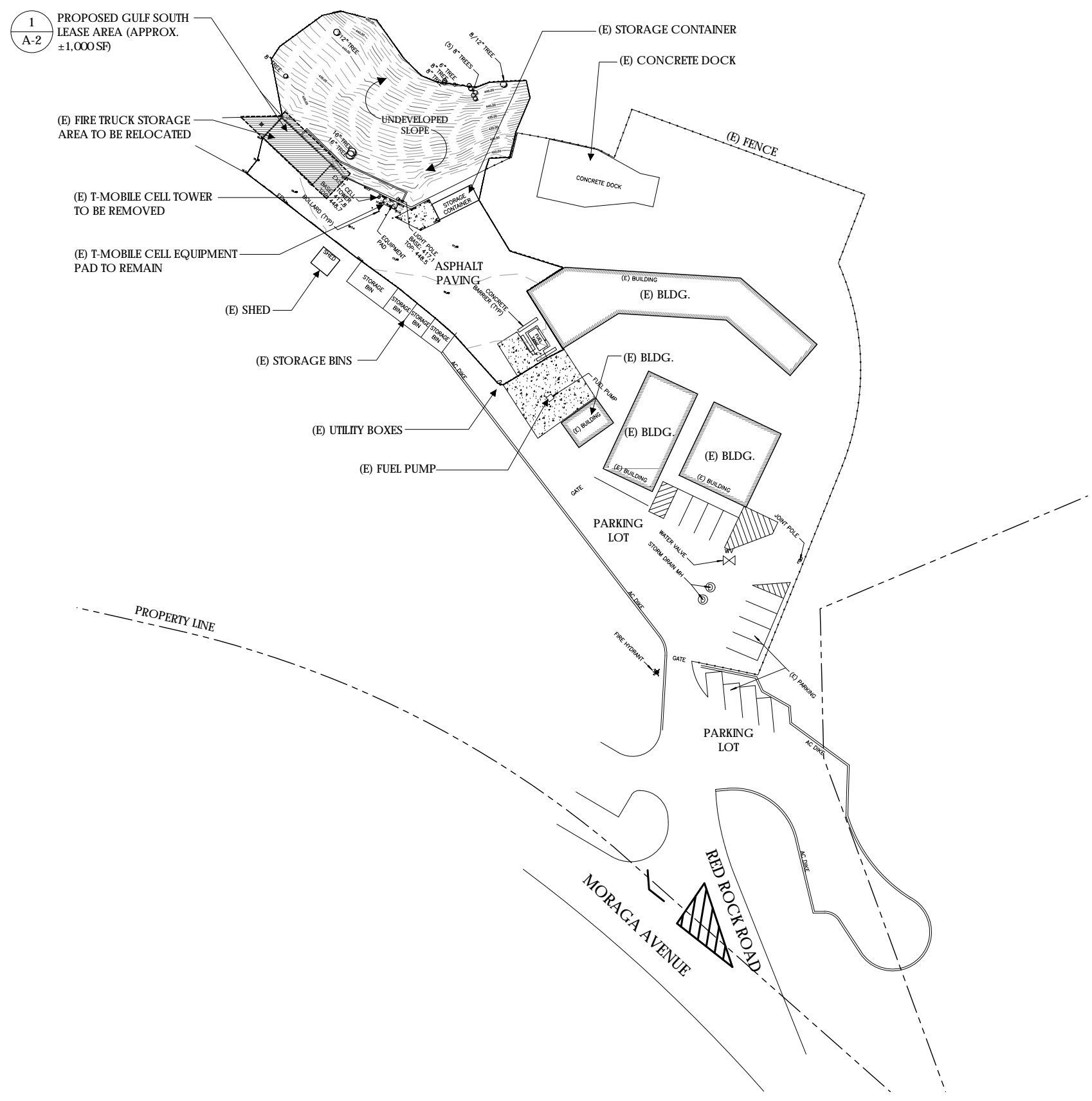
OVERALL SITE PLAN

Sheet Title:

**A.1**

Sheet No.:

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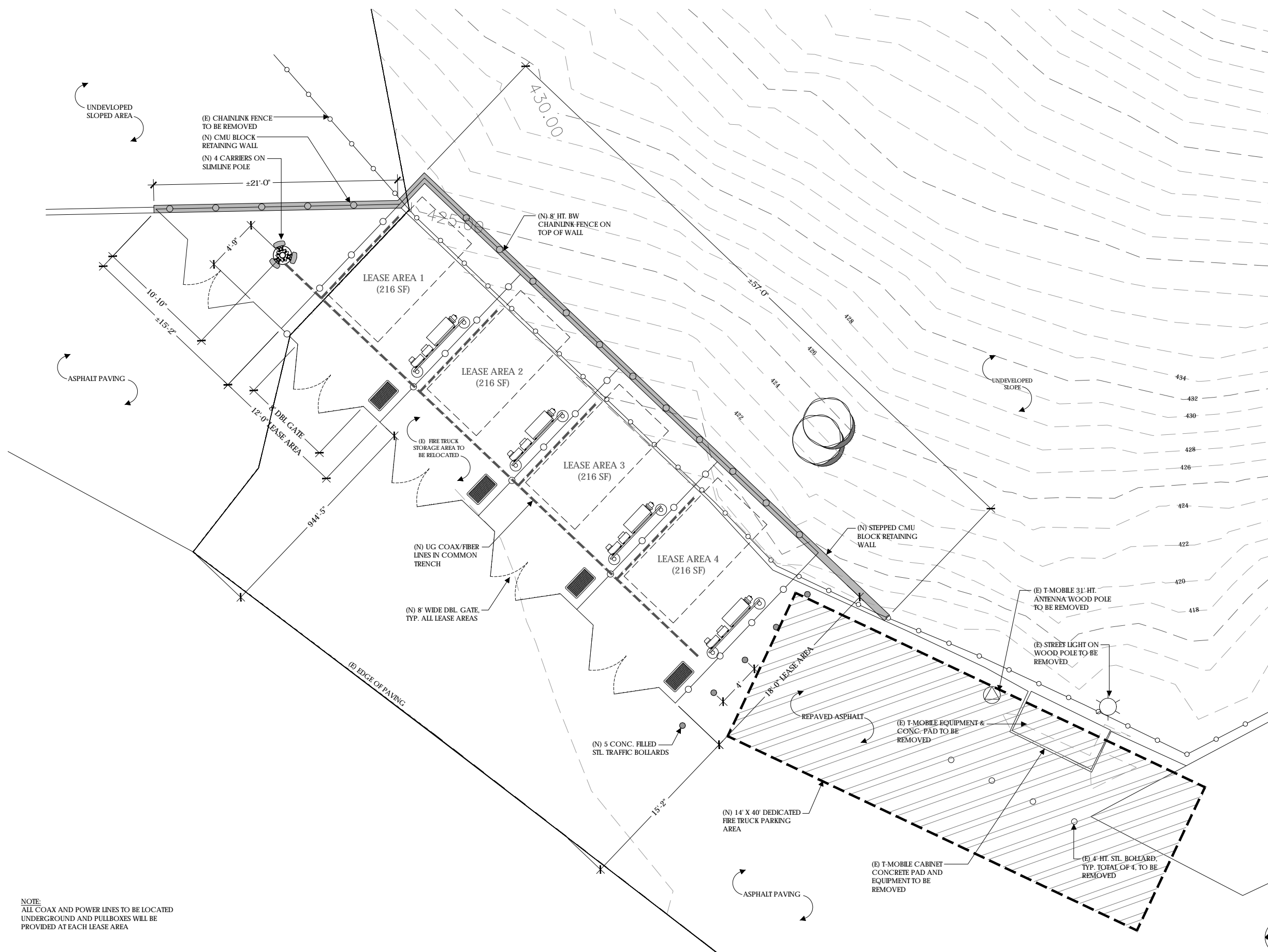
ANTENNA PLAN ENLARGEMENTS  
 BUILDING/ANTENNA ISOMETRIC

Sheet Title:

**A.2**

Sheet No.:

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NOTE:  
 ALL COAX AND POWER LINES TO BE LOCATED UNDERGROUND AND PULLBOXES WILL BE PROVIDED AT EACH LEASE AREA





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Client: \_\_\_\_\_



Meridian Management LLC  
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 Concord, CA 94518  
 T 707.592.5924  
 www.meridian.management

Project Architect: \_\_\_\_\_

Site Agent: \_\_\_\_\_

90% Zoning Drawings

Drawing Phase: \_\_\_\_\_

**PIEDMONT  
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Professional Seal: \_\_\_\_\_

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Designed By: JG Checked: RB

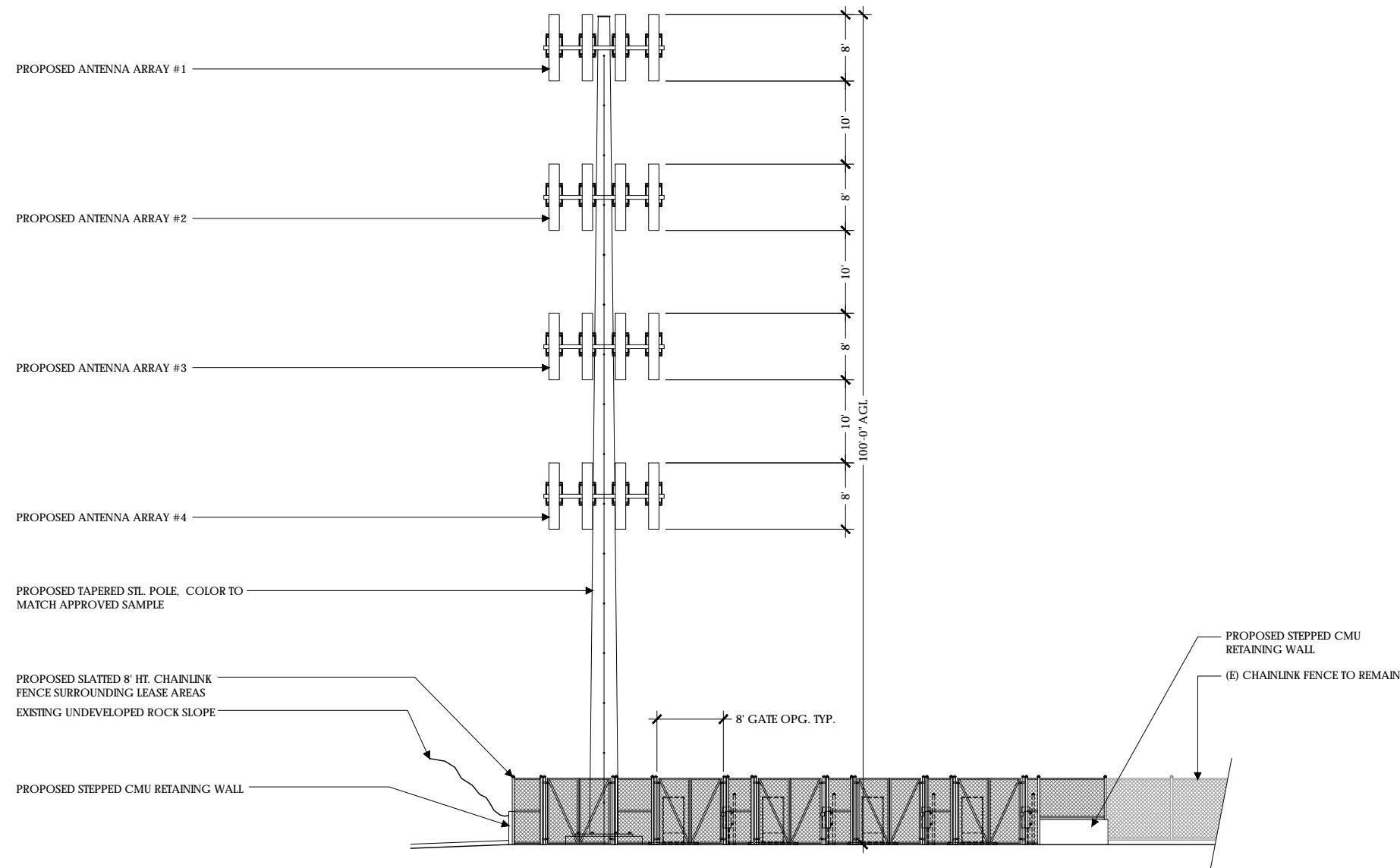
ELEVATION

Sheet Title: \_\_\_\_\_

**A.3**

Sheet No.: \_\_\_\_\_

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Site Agent: \_\_\_\_\_

90% Zoning Drawings

Drawing Phase: \_\_\_\_\_

**PIEDMONT  
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Site Name: \_\_\_\_\_

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Project No.: \_\_\_\_\_

Date: 01/16/18 Job No.: \_\_\_\_\_

Scale: AS SHOWN CAD File: \_\_\_\_\_

Designed By: JG Checked: RB

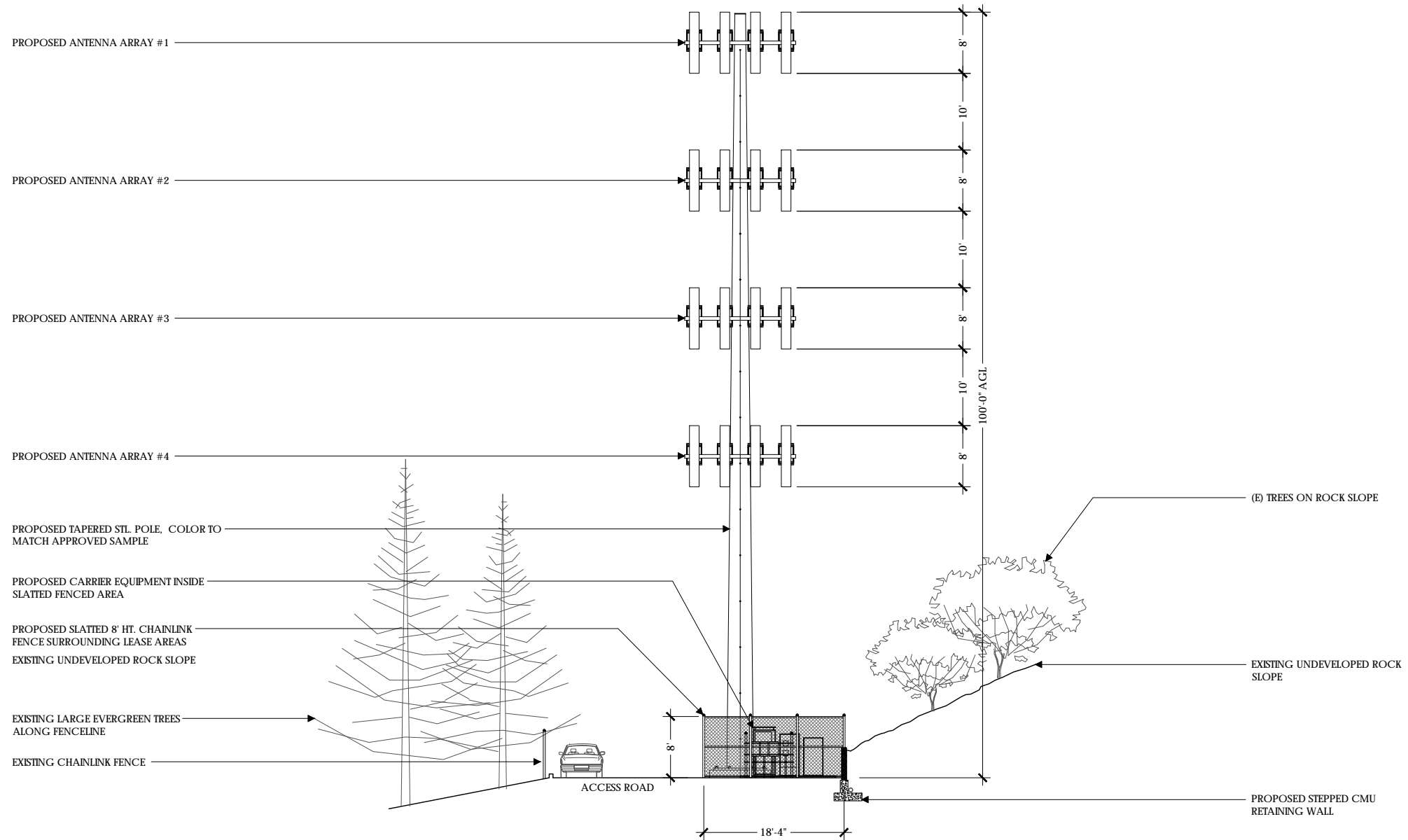
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Sheet Title: \_\_\_\_\_

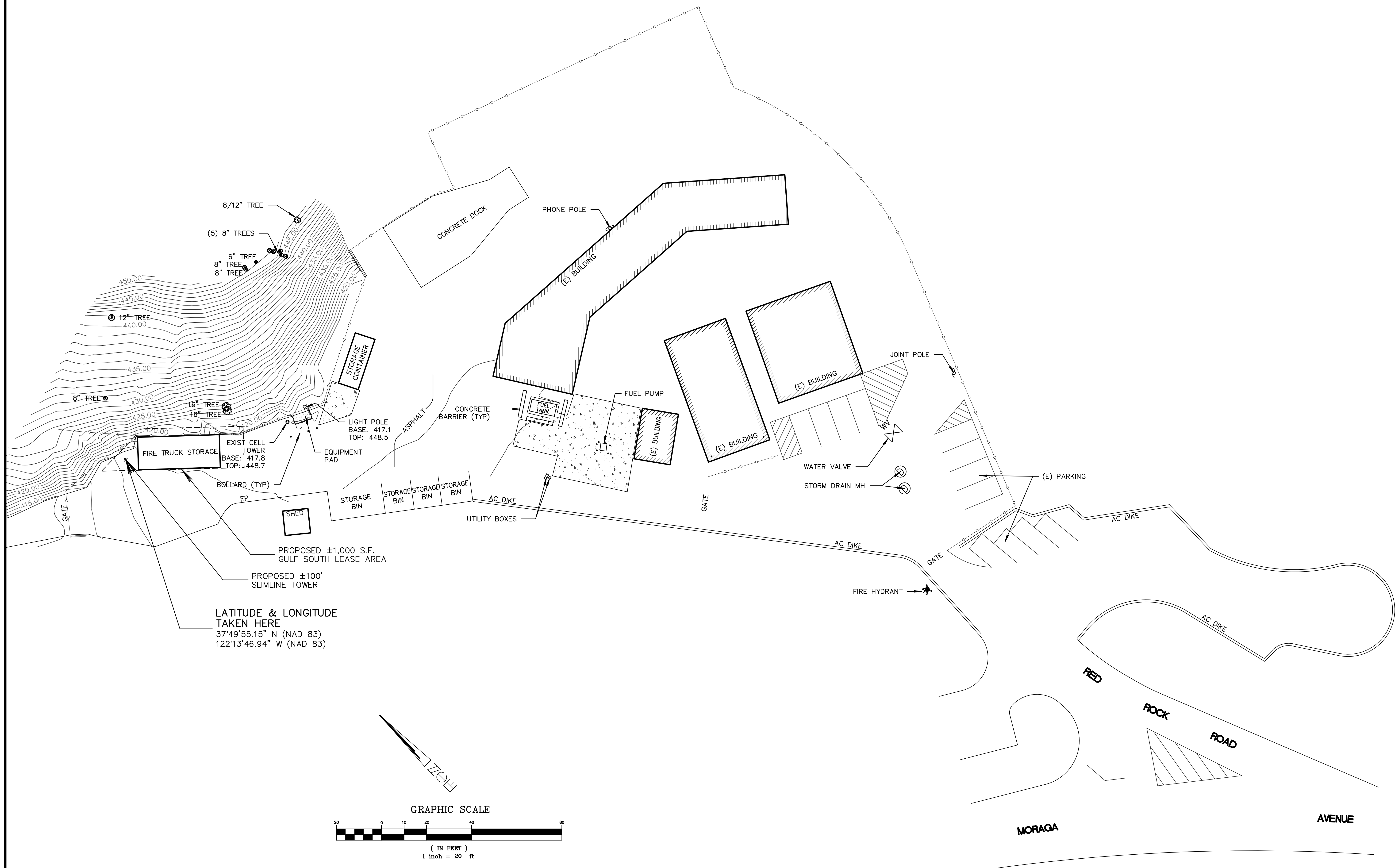
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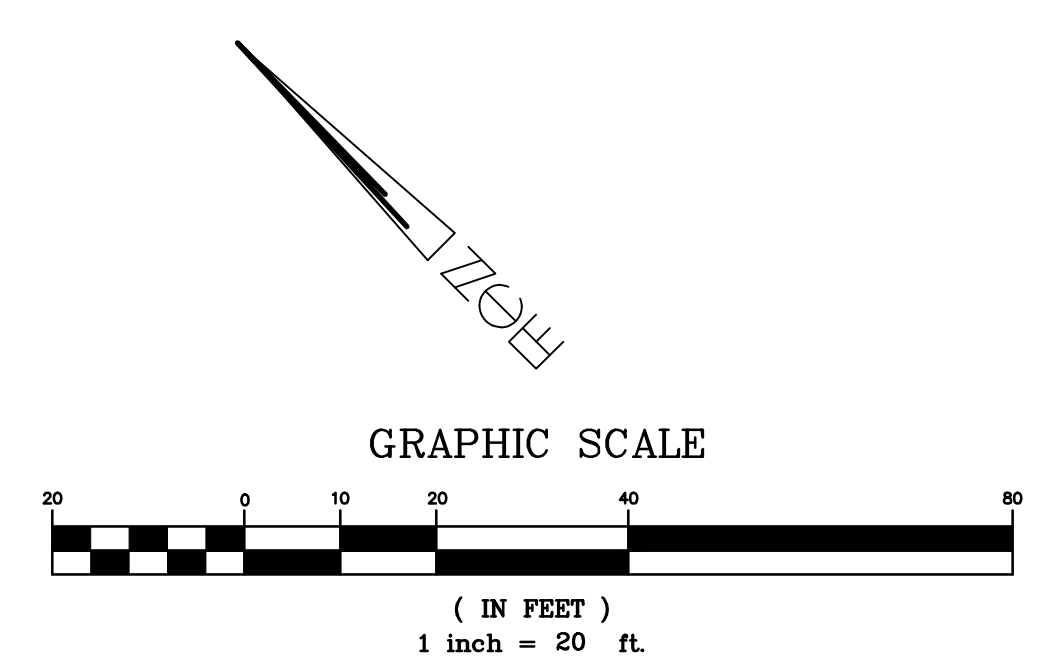
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**SITE OVERVIEW MAP**



LATITUDE & LONGITUDE  
TAKEN HERE  
37°49'55.15" N (NAD 83)  
122°13'46.94" W (NAD 83)

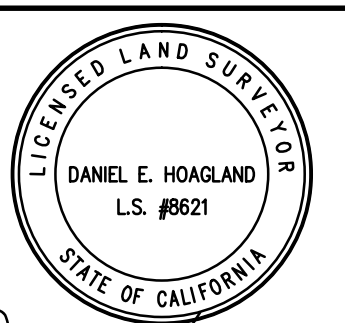


**LEGEND**

	FENCE
	AC DIKE
	CONCRETE SLAB

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*Tom Hoagland*

**REVISIONS**

NO.	DATE	DESCRIPTION
1	08/08/17	ISSUED FOR REVIEW
2	01/22/18	EXPANDED TOPOGRAPHY
3	2/22/18	ADDED TOWER AND LEASE AREA

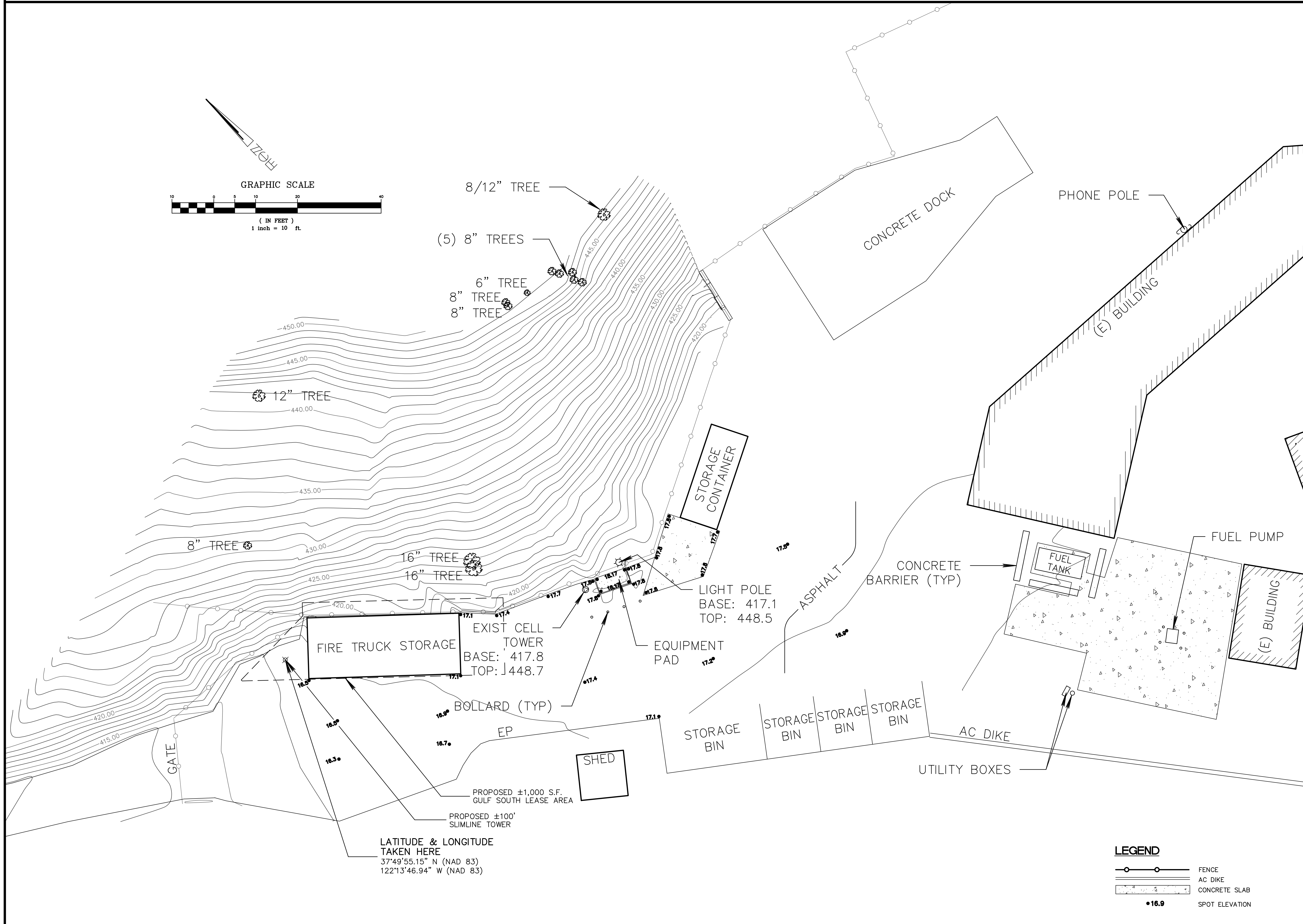
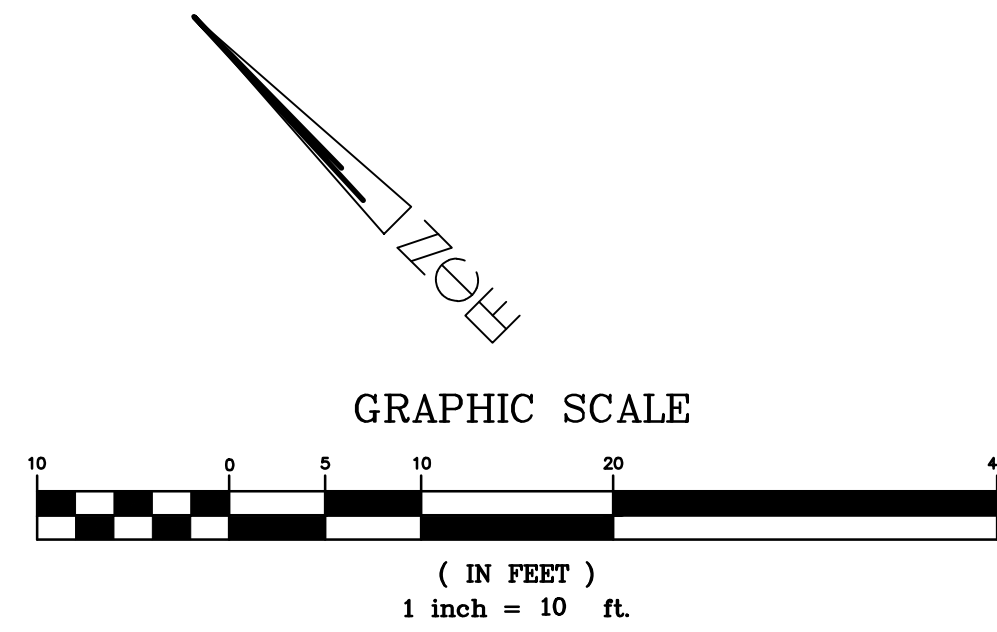


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PIEDMONT CORP YARD  
NEAR 898 RED ROCK ROAD  
PIEDMONT, CA 94611

DRAWN: JEB | DATE: 08/07/17  
JOB NO. 17-058-PIEDMONT  
SHEET NO.

C-1

**SITE DETAIL MAP**

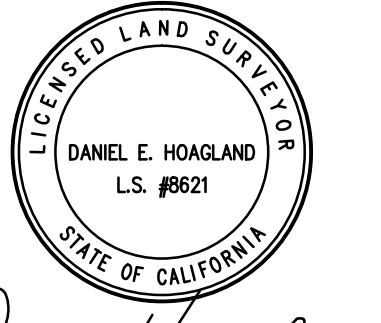


LATITUDE & LONGITUDE  
TAKEN HERE  
37°49'55.15" N (NAD 83)  
122°13'46.94" W (NAD 83)

**LEGEND**

	FENCE
	AC DIKE
	CONCRETE SLAB
	SPOT ELEVATION

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*Tom Hoagland*

**REVISIONS**

NO.	DATE	DESCRIPTION
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NEAR 898 RED ROCK ROAD  
PIEDMONT, CA 94611

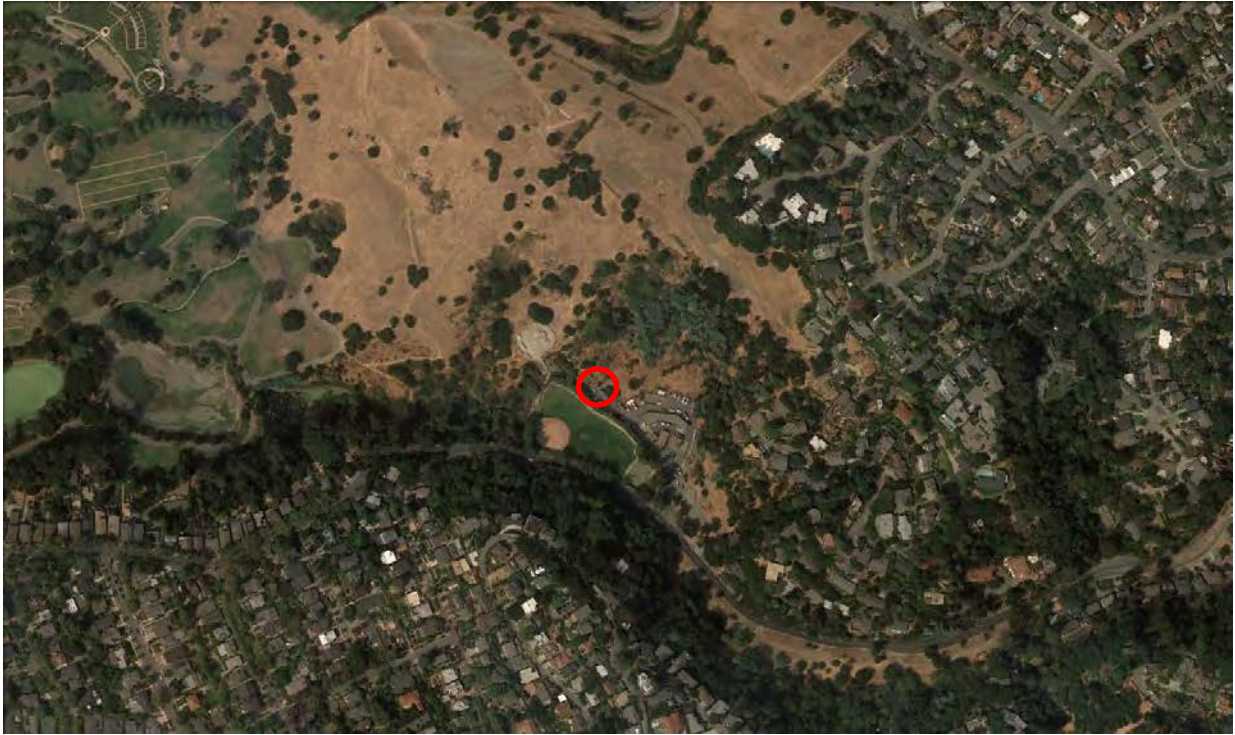
DRAWN: JEB | DATE: 08/07/17  
JOB NO. 17-058-PIEDMONT  
SHEET NO.

C-2

## **Appendix B**

### Site Maps





Site Location & Surrounding Properties



Site Location

**Aerial Photographs (2017)**

**GST Capital Partners, LLC – Piedmont Corp Yard**  
898 Red Rock Road  
Piedmont, California 94611



### Oakland East Quadrangle, California (2015)

Contour Interval = 20 Feet

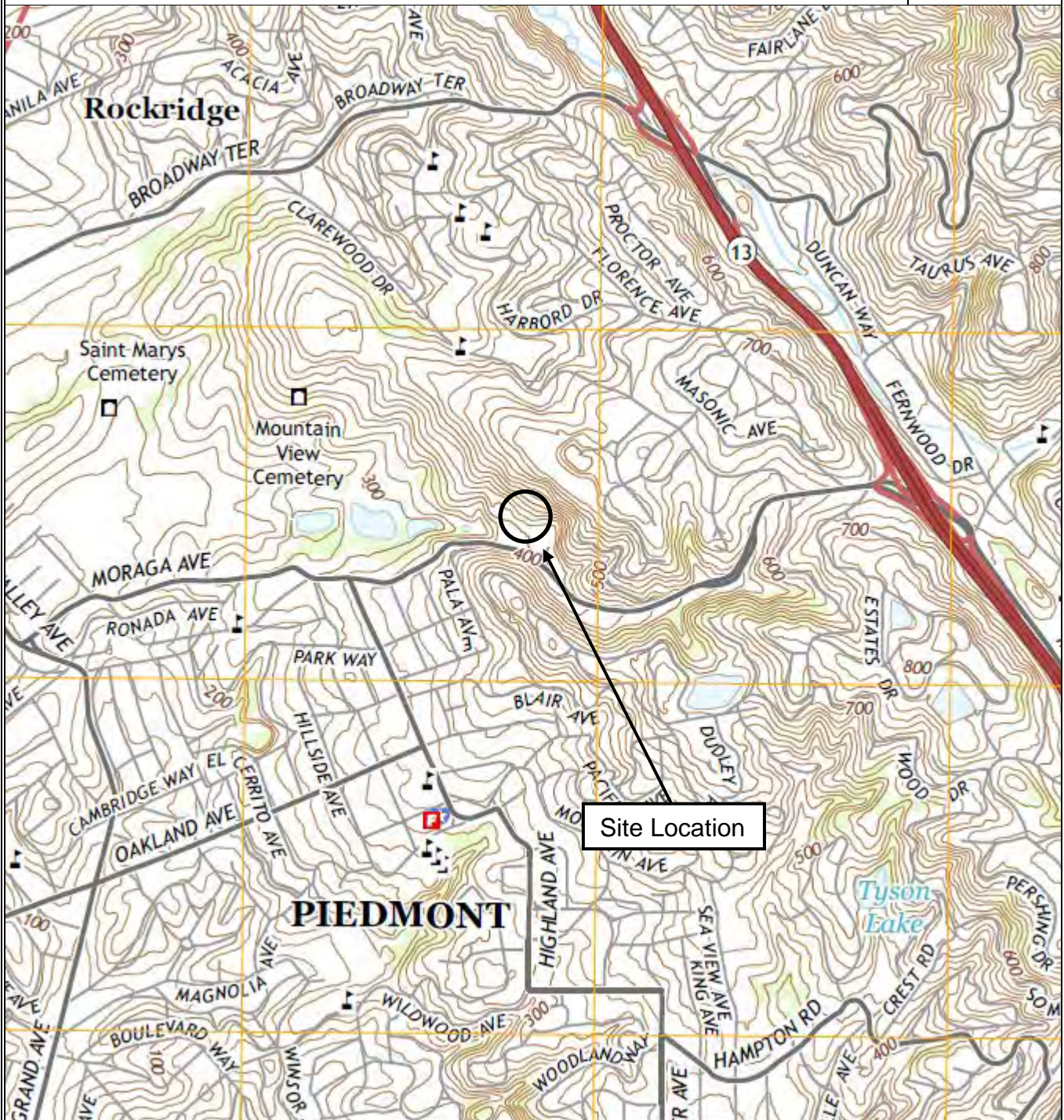
Scale 1 Inch = ~2,000 Feet

Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W

No Township Information Available



North



### Site Vicinity Map

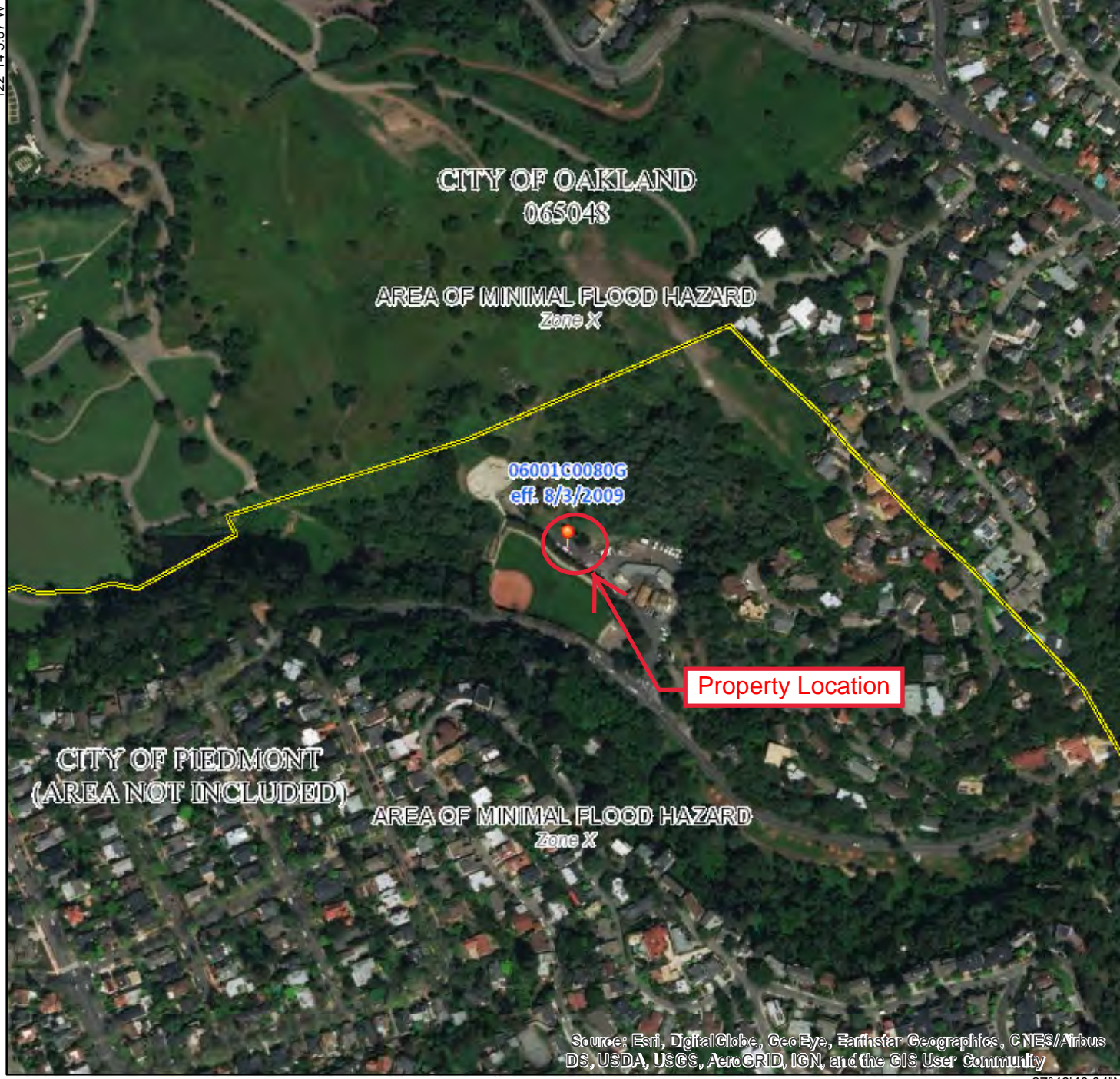
GST Capital Partners, LLC – Piedmont Corp Yard  
 898 Red Rock Road  
 Piedmont, California 94611



# National Flood Hazard Layer FIRMette ATTACHMENT D



37°50'9.36"N



### Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth
		Regulatory Floodway Zone AE, AO, AH, VE, AR
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
MAP PANELS		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
		No Digital Data Available
		Unmapped

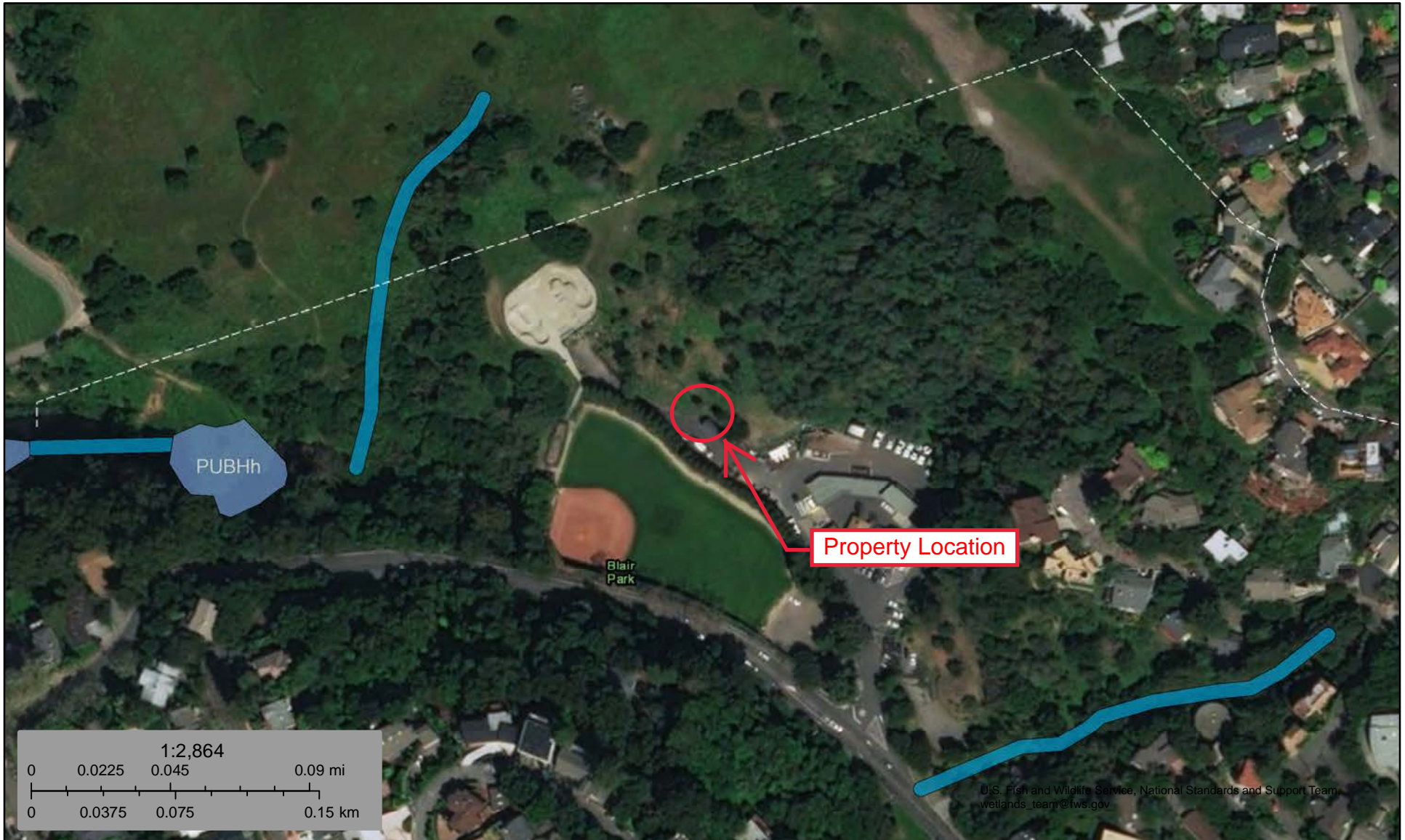
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The base map shown complies with FEMA's base map accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **4/13/2018 at 11:25:27 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: base map imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

122°14'5.67"W

122°13'28.21"W



U.S. Fish and Wildlife Service, National Standards and Support Team  
wetlands\_team@fws.gov

April 13, 2018

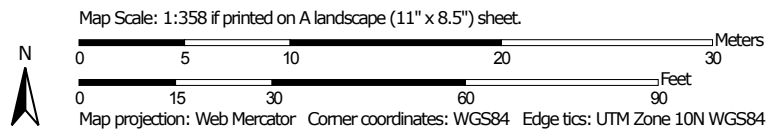
**Wetlands**

- |   |                                |   |                                   |   |          |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland       |  | Lake     |
|  | Estuarine and Marine Wetland   |  | Freshwater Forested/Shrub Wetland |  | Other    |
|   |                                |  | Freshwater Pond                   |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.




Soil Map may not be valid at this scale.





## MAP LEGEND

### Area of Interest (AOI)

 Area of Interest (AOI)

### Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

### Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

### Water Features



Streams and Canals

### Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

### Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

**Warning:** Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service  
Web Soil Survey URL:  
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Alameda County, California, Western Part  
Survey Area Data: Version 14, Oct 3, 2017

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Oct 7, 2013—Nov 1, 2013

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

## Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
126	Maymen loam, 30 to 75 percent slopes	0.6	100.0%
<b>Totals for Area of Interest</b>		<b>0.6</b>	<b>100.0%</b>

# U.S. Fish and Wildlife Service National Wildlife Refuge System Map



North



**USFWS – Wildlife Refuge Map**  
**GST Capital Partners, LLC – Piedmont Corp Yard**  
 898 Red Rock Road  
 Piedmont, California 94611





# North American Migration Flyways



North



## Migratory Bird Flyways – Location Map

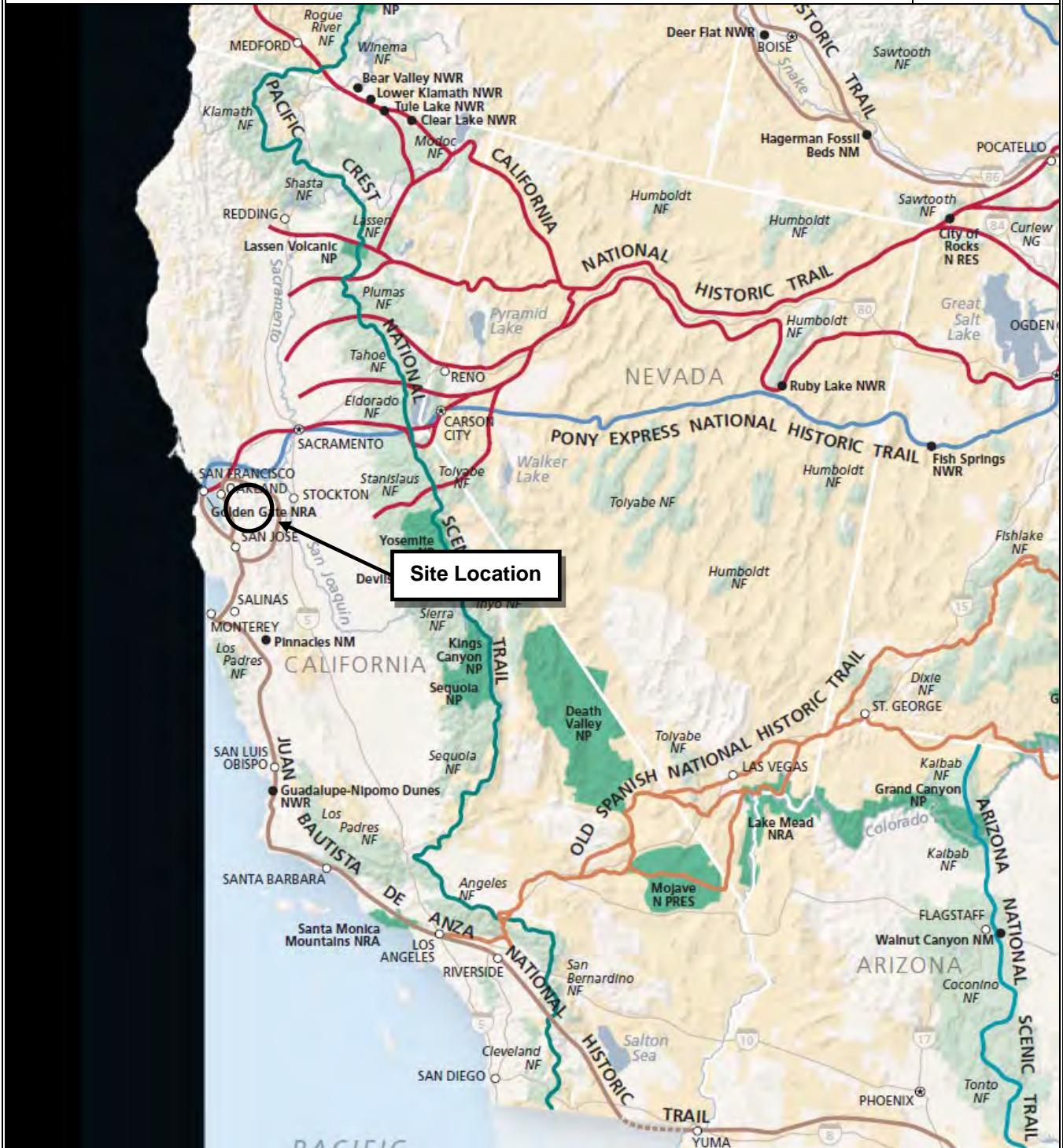
GST Capital Partners, LLC – Piedmont Corp Yard  
898 Red Rock Road  
Piedmont, California 94611



# National Park Service National Historic Trails and Scenic Routes



North



Site Location

## National Park Service – Trails and Routes Map

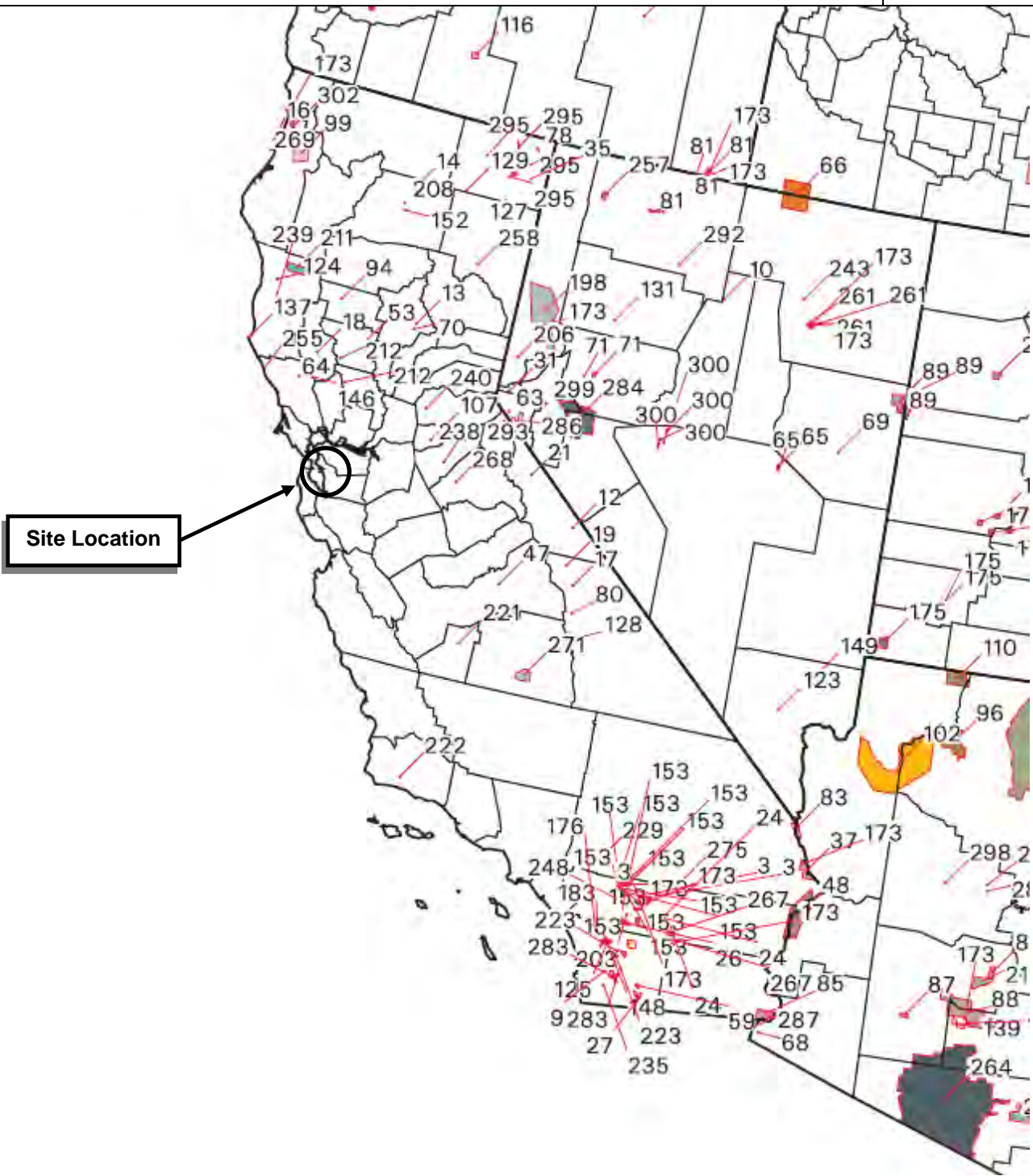
GST Capital Partners, LLC – Piedmont Corp Yard  
898 Red Rock Road  
Piedmont, California 94611



### Bureau of Indian Affairs Indian Reservation Map



North



### Bureau of Indian Affairs – Reservation Map

GST Capital Partners, LLC – Piedmont Corp Yard  
898 Red Rock Road  
Piedmont, California 94611



**Appendix C**  
Site Photographs



**Site Photograph 1** – Looking northwest at Property and pole to be removed



**Site Photograph 2** – Looking north at the Property and the tower to be removed

**Site Photographs**

**GST Capital Partners, LLC – Piedmont Corp Yard**  
898 Red Rock Road  
Piedmont, California 94611

Photographed:  
April 23, 2018



**Site Photograph 3** – Looking northwest at the Property



**Site Photograph 4** – Looking east away from the Property and east at the tower to be removed

**Site Photographs**

**GST Capital Partners, LLC – Piedmont Corp Yard**  
898 Red Rock Road  
Piedmont, California 94611

Photographed:  
April 23, 2018



**Site Photograph 5** – Looking north away from the Property



**Site Photograph 6** – Looking south away from the Property

**Site Photographs**

**GST Capital Partners, LLC – Piedmont Corp Yard**  
898 Red Rock Road  
Piedmont, California 94611

Photographed:  
April 23, 2018



**Site Photograph 7** – Looking east away from the Property



**Site Photograph 8** – Looking west away from the Property

**Site Photographs**

**GST Capital Partners, LLC – Piedmont Corp Yard**  
898 Red Rock Road  
Piedmont, California 94611

Photographed:  
April 23, 2018



## **Appendix D**

**Documentation of Officially Designated  
Wilderness Areas, Wildlife Preserves and  
Endangered Species**



ENVIRONMENTAL • ARCHITECTURE • ENGINEERING

1051 Winderley Place, Suite 201, Maitland, Florida 32751 - 407.660.7840 - www.trileaf.com

May 14, 2018

**U.S. FISH AND WILDLIFE SERVICE**  
**SACRAMENTO FISH AND WILDLIFE SERVICE**  
2800 Cottage Way  
Sacramento, California 95825  
Phone: (916) 414-6623

RE: **Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**  
898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W

To Whom It May Concern:

Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. A site location map, photos and biological assessment are enclosed to assist you in your review.

Our investigation includes determining if any of the following special resource areas are located at the site.

1. Is the site located in or on a wilderness area or wildlife preserve?
2. Is the site located within a principal migratory bird flyway?
3. Is the site located in or on a designated critical habitat?
4. Does the site sustain any species of plant or animal life that is designated or proposed as threatened or endangered?

As noted in the enclosed Informal Biological Assessment, neither the species nor their habitats have been observed within the action area. Therefore, based on the documents reviewed, no threatened/endangered species or designated critical habitat will be impacted by the proposed project.

Trileaf is requesting concurrence from the USFWS with the finding of “no effect” to threatened and endangered species, critical habitat, or other special resources. If you need additional information or have any questions you may reach me at (480) 850-0575 or k.grimwood@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Kimberly Grimwood  
Project Scientist II

## **Informal Biological Assessment**

**GST Capital Partners, LLC**

**Project Name: Piedmont Corp Yard / Client #CA2016003 - Trileaf #639072**

**Latitude: 37-49-55.15 N; Longitude: 112-13-46.94 W**

Trileaf performed an Informal Biological Assessment for the subject site. The purpose is to document whether the proposed undertaking will affect listed or proposed threatened or endangered species, designated critical habitats, wetlands, and migratory birds. A project description, site photographs and topographical site location maps are included in this report.

### **Proposed Project Description:**

The Site is located at 898 Red Rock Road, Piedmont, Alameda County, CA 94611, and consists of the construction of a 100-foot Monopole Communications Tower within a 1,000 square foot lease area. The Site is accessed via Red Rock Road located to the southeast of the proposed lease area. The proposed tower site is approximately 416.3 feet above mean sea level.

### **Site and Surrounding Habitat:**

The Site is currently located within an asphalt paved portion of parking area associated with a storage and maintenance yard for the City of Piedmont. During the area reconnaissance, no trees along the access road, and generally throughout the area were identified to be removed.

The surrounding habitat within a 0.5 mile radius of the proposed site consists predominantly of residential development. To the north and east is undeveloped land, followed by residential development. To the south is an athletic facility and the City of Piedmont storage and maintenance yard, followed by Moraga Avenue, followed by residential development. To the west is undeveloped land, followed by Mountain View Cemetery. The current habitat is not mapped as critical habitat, nor does it qualify as sufficient habitat for Federal listed species.

### **Wetlands:**

Trileaf has reviewed the topographic map, soil composition, as well as the National Wetlands Inventory Map to determine if the proposed lease area and easements would have an impact on any wetlands or require significant amounts of fill or grading. Trileaf determined that the site is not located in a recognized national wetland area.

Trileaf performed a field visit and identified surface water bodies. Using local maps in combination with an area reconnaissance the following water bodies have been identified in the table below:

Piedmont Corp Yard  
Trileaf# 639072

Water Body Type	Water Body Name	Direction from Tower	Distance from Tower
Seasonal Wash	Unnamed	NW	469 feet
Decorative Freshwater Pond	Mountain View Cemetery	W	566 feet
Seasonal wash	Unnamed	SE	577 feet
Decorative Freshwater Pond	Mountain View Cemetery	W	0.23 miles
Seasonal Wash	Unnamed	E	0.29 miles
Decorative Freshwater Pond	Mountain View Cemetery	W	0.33 miles

### **Migratory Birds:**

The proposed Site and design process for this project could not conform to all the USFWS recommendations to decrease potential effects on migratory birds. Therefore, it has included mitigating factors such as tower placement within minimally sensitive areas, avoiding placement near wetlands and large water bodies, limiting tower height to 110 feet, and eliminating the need for guy wires. Additionally, the proposed Site is not located within a principal migratory bird flyway. Upon our site investigation, it was determined that the project area is not located in an NWI mapped wetland, waterway, wildlife refuge, national wilderness area, native grassland or forest area, ridge-line, mountain top, coastline or area commonly known to have high incidences of fog or low clouds, where migratory birds may be found. Based upon the efforts undertaken during this IBA as well as the current data made available, we have concluded that this project will not have a significant effect on migratory birds; however, the presence of migratory birds cannot be ruled out.

### **Soils:**

According to the U.S. Soil Conservation Service Soil Survey of Alameda County, California, the Site is underlain by Maymen loam with 30 to 75 percent slopes. Maymen soils consist of somewhat excessively drained soils that are formed from residuum weathered from sedimentary rock and are found in hills. The depth to the most restrictive feature is 10 to 20 inches to lithic bedrock. The depth to the water table is more than 80 inches. A typical profile of Maymen soils consists of a surface layer of loam extending from 0 to 19 inches and a subsurface layer of unweathered bedrock extending from 19 to 23 inches. Maymen soils have no frequency of flooding or ponding. Maymen loam, 30 to 75 percent slopes, is not considered a hydric soil, and no hydrophytic vegetation or surface water was observed.

### **Threatened or Endangered Species:**

Trileaf has researched the listed or proposed threatened or endangered species and designated critical habitat for the project area. This includes any such species that have been reported to exist within the action area where the project is located. The list of federally threatened or endangered species was acquired through the U.S. Fish and Wildlife Service's Information, Planning, and Consultation system (IPaC). The lease area is not located within an aquatic environment; therefore, any obligate aquatic species should not be directly impacted by this project and are not included in the table below. In

Piedmont Corp Yard  
Trileaf# 639072

addition, due to the developmental disturbances at the Site, no native plant species are present and are therefore not included. A list of remaining species and site observations are summarized in the following table:

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
Alameda Whipsnake ( <i>Masticophis lateralis euryxanthus</i> )	Federal – Threatened	Chaparral – northern coastal sage scrub and coastal sage. Rock outcrops, rock crevices and mammal burrows	No effect	Habitat assessment indicated no potential habitat present
Bay Checkerspot Butterfly ( <i>Euphydryas editha bayensis</i> )	Federal – Threatened	Vegetation in shallow, serpentine-derived soil. Dwarf plantain and purple owl's clover necessary for larvae	No effect	Habitat assessment indicated no potential habitat present
California Clapper Rail ( <i>Rallus longirostris obsoletus</i> )	Federal – Endangered	Range of salt and brackish water marshes dominated by both pickleweed and Pacific cordgrass	No effect	Habitat assessment indicated no potential habitat present
California Least Tern ( <i>Sterna antillarum browni</i> )	Federal – Endangered	Along the coast, nest on open beaches kept free of vegetation by the tide	No effect	Habitat assessment indicated no potential habitat present
California Red-legged Frog ( <i>Rana draytonii</i> )	Federal – Threatened	Matrix of riparian and upland dispersal habitats. Breed in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds and lagoons	No effect	Habitat assessment indicated no potential habitat present

Piedmont Corp Yard  
Trileaf# 639072

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
California Tiger Salamander ( <i>Ambystoma californiense</i> )	Federal – Threatened	Grasslands and low foothills with pools or ponds (necessary for breeding). Utilizes burrows made by other burrowing animals	No effect	Habitat assessment indicated no potential habitat present
Callippe Silverspod Butterfly ( <i>Speyeria callippe callippe</i> )	Federal – Endangered	Viola plants	No effect	Habitat assessment indicated no potential habitat present
Salt Marsh Harvest Mouse ( <i>Reithrodontomys raviventris</i> )	Federal – Endangered	Salt marshes that support dense stands of pickleweed and are adjacent to upland, salt-tolerant vegetation	No effect	Habitat assessment indicated no potential habitat present
San Bruno Elfin Butterfly ( <i>Callophrys mossii bayensis</i> )	Federal – Endangered	Rocky outcrops and cliffs in coastal scrub on the San Francisco Peninsula	No effect	Habitat assessment indicated no potential habitat present

Piedmont Corp Yard  
Trileaf# 639072

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
Western Snowy Plover ( <i>Charadrius alexandrinus nivosus</i> )	Federal – Threatened	Barren to sparsely vegetated sand beaches, dry salt flats in lagoons, dredge spoils deposited on beach or dune habitat, levees and flats at salt- evaporation ponds, river bars, along alkaline or saline lakes, reservoirs, and ponds. Nests are a natural or scraped depression on dry ground usually lined with pebbles, shell fragments, fish bones, mud chips, vegetation fragments, or invertebrate skeletons	No effect	Habitat assessment indicated no potential habitat present

**Conclusions:**

Based on the efforts undertaken during our IBA, project specifications and the current data made available, we have concluded that there is no potential for the proposed project to have a significant effect on listed or proposed, threatened and endangered species, their designated critical habitat, or migratory birds.

*It should be noted that this informal biological assessment was conducted in accordance with the Scope of Work and does not constitute a Section 7 Biological Assessment under the Endangered Species Act (50 CFR Part 402.01).*



Kimberly Grimwood  
Natural Resource Specialist

*Please refer to Appendix B for Site Maps*



*Please refer to Appendix C for Site Photographs*



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Sacramento Fish And Wildlife Office  
Federal Building  
2800 Cottage Way, Room W-2605  
Sacramento, CA 95825-1846  
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To:

May 14, 2018

Consultation Code: 08ESMF00-2018-SLI-2105

Event Code: 08ESMF00-2018-E-06183

Project Name: 639072

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Please follow the link below to see if your proposed project has the potential to affect other species or their habitats under the jurisdiction of the National Marine Fisheries Service:

[http://www.nwr.noaa.gov/protected\\_species/species\\_list/species\\_lists.html](http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html)

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

---

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Sacramento Fish And Wildlife Office**

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

---

## Project Summary

Consultation Code: 08ESMF00-2018-SLI-2105

Event Code: 08ESMF00-2018-E-06183

Project Name: 639072

Project Type: COMMUNICATIONS TOWER

Project Description: Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area.

### Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/37.831362355434294N122.22895708809327W>



Counties: Alameda, CA

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## Endangered Species Act Species

There is a total of 16 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Mammals

NAME	STATUS
Salt Marsh Harvest Mouse <i>Reithrodontomys raviventris</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/613">https://ecos.fws.gov/ecp/species/613</a>	Endangered

### Birds

NAME	STATUS
California Clapper Rail <i>Rallus longirostris obsoletus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/4240">https://ecos.fws.gov/ecp/species/4240</a>	Endangered
California Least Tern <i>Sterna antillarum browni</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/8104">https://ecos.fws.gov/ecp/species/8104</a>	Endangered
Western Snowy Plover <i>Charadrius alexandrinus nivosus</i> Population: Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast) There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/8035">https://ecos.fws.gov/ecp/species/8035</a>	Threatened

---

## Reptiles

NAME	STATUS
Alameda Whipsnake (=striped Racer) <i>Masticophis lateralis euryxanthus</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5524">https://ecos.fws.gov/ecp/species/5524</a>	Threatened

## Amphibians

NAME	STATUS
California Red-legged Frog <i>Rana draytonii</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/2891">https://ecos.fws.gov/ecp/species/2891</a>	Threatened
California Tiger Salamander <i>Ambystoma californiense</i> Population: U.S.A. (Central CA DPS) There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/2076">https://ecos.fws.gov/ecp/species/2076</a>	Threatened

## Fishes

NAME	STATUS
Delta Smelt <i>Hypomesus transpacificus</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/321">https://ecos.fws.gov/ecp/species/321</a>	Threatened
Tidewater Goby <i>Eucyclogobius newberryi</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/57">https://ecos.fws.gov/ecp/species/57</a>	Endangered

## Insects

NAME	STATUS
Bay Checkerspot Butterfly <i>Euphydryas editha bayensis</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/2320">https://ecos.fws.gov/ecp/species/2320</a>	Threatened
Callippe Silverspot Butterfly <i>Speyeria callippe callippe</i> There is <b>proposed</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/3779">https://ecos.fws.gov/ecp/species/3779</a>	Endangered
San Bruno Elfin Butterfly <i>Callophrys mossii bayensis</i> There is <b>proposed</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/3394">https://ecos.fws.gov/ecp/species/3394</a>	Endangered



## Crustaceans

NAME	STATUS
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/498">https://ecos.fws.gov/ecp/species/498</a>	Threatened

## Flowering Plants

NAME	STATUS
Pallid Manzanita <i>Arctostaphylos pallida</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/8292">https://ecos.fws.gov/ecp/species/8292</a>	Threatened
Presidio Clarkia <i>Clarkia franciscana</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/3890">https://ecos.fws.gov/ecp/species/3890</a>	Endangered
Robust Spineflower <i>Chorizanthe robusta var. robusta</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/9287">https://ecos.fws.gov/ecp/species/9287</a>	Endangered

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Pacific Southwest Region  
2800 Cottage Way, Room W-2606  
Sacramento, California 95825-1846

In Reply Refer to:  
FWS/R8/AES

DEC 06 2013

## Memorandum

To: Ecological Services Project Leaders, Region 8

From: *Action* Assistant Regional Director, Ecological Services, Region 8

Subject: Regional Policy on "No Effect" Determinations

As you know, the implementing regulations for section 7 of the Endangered Species Act do not require a Federal action agency to obtain written concurrence from the Service if they determine that their proposed action will not affect listed species or critical habitat, nor do these regulations provide a legal mechanism for the Service to concur with such a determination. Recently, Region 8 has been involved in litigation related to actions for which the action agency requested our concurrence with their "no effect" determination. It is apparent that further clarification is needed on this issue.

Although periodic, interagency coordination on the proper analytical framework for effect determinations is important, given our budget and staffing constraints, it is also imperative that we prioritize our section 7 workload to focus our efforts on those activities that we are legally mandated to complete. If your staff review these requests, even though the section 7 handbook contemplates that the Service may concur on an action agency's "no effect" determination, as a matter of regional policy do not provide concurrence or non-concurrence in writing (including e-mail). You should acknowledge that we have no regulatory or statutory authority for concurring with "no effect" determinations and remind the requester that it is the action agency's responsibility to make effect determinations for compliance with section 7(a)(2).

If an action agency requests technical assistance on an effect determination, you are encouraged to assist insofar as your workload and staffing constraints allow consistent with our priorities. I encourage you to continue using innovative methods for communicating best available information to action agencies to assist them in making well-informed determinations, such as through the posting of species accounts and other guidance on your field office websites.

If you have any questions on this policy, please contact Jana Affonso at 916-414-6593.

cc:  
Region 8 ARDs

**Appendix E**  
Section 106 Review

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
SACRAMENTO, CA 95816-7100  
(916) 445-7000 Fax: (916) 445-7053  
calshpo@parks.ca.gov  
www.ohp.parks.ca.gov



Dear FCC Applicant:

Section 106 FCC submissions will not be accepted unless this cover sheet is completed and attached.

Project Name	<u>The Piedmont Corp Yard Tower Installation Project</u>
Project Address	<u>898 Red Rock Road, City of Piedmont, Alameda County, California</u>

Based on the information provided on the accompanying FCC Form 620 or Form 621 the following information applies to this project:

X	There are buildings or structures over 45 years of age within this project's direct/indirect area of potential effect (APE).
	There is an archeological site located within this project's direct APE.
	A qualified archeologist has determined that the proposed project area is considered moderately to highly sensitive for archeological resources.

If the above boxes are blank, there are no historic properties within the direct or indirect project area. Therefore, pursuant to Stipulation VII.B.2 of the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission* as quoted below, **your Section 106 responsibilities are complete:**

If the SHPO/THPO does not provide written notice to the Applicant that it agrees or disagrees with the Applicant's determination of No Historic Properties Affected within 30 days following receipt of a complete Submission Packet, it is deemed that no Historic Properties Exist within the APE or the Undertaking will have no effect on Historic Properties. The Section 106 process is then complete and the Applicant may proceed with the project, unless further processing for reasons other than Section 106 is required.

\_\_\_\_ Yes, this submission contains an eligibility determination requiring SHPO concurrence. \_\_\_\_ Yes, this submission contains tribal response.

This project will: Not \_\_\_\_ Not Adversely X Adversely \_\_\_\_ affect Historic Properties. The qualified project archeologist acknowledges that a pedestrian survey has been completed, a record search has been conducted at the appropriate California Historic Resources Information Center (IC) and that all submitted information is true.

Archeologist's signature Michelle Noble Date 5/3/2018

**Please note, this letter pertains only to FCC projects being submitted to the California SHPO for comment.**

Sincerely,

**Julianne Polanco**  
State Historic Preservation Officer

**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**

1051 Winderley Place, Suite 201, Maitland, Florida 32751 - 407.660.7840 - www.trileaf.com

May 22, 2018

**State of California Office of Historic Preservation  
Department of Parks and Recreation****Attn: Ms. Julianne Polanco, SHPO**1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816-7100  
(916) 445-7000

RE: **Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**  
898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W

Dear Ms. Polanco:

Trileaf Corporation is in the process of completing a Section 106 review for a NEPA at the referenced property. Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The antenna will be licensed by the Federal Communications Commission (FCC).

In accordance with the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission*, dated September 2004, a cultural resource investigation has been conducted. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Summary reports of this investigation, maps, photographs and other information are provided in the attached Form 620. As noted, no historic properties listed in or eligible for inclusion in the National Register of Historic Places are located within the direct or visual APE for this project. In addition, no archaeological sites or artifacts were encountered during the archaeological survey.

We really appreciate your co-operation in this regard and anticipate your concurrence with these findings. Please call me at (480) 850-0575 or email me, k.grimwood@trileaf.com, if you need any additional information or have any questions. Thank you for your assistance.

Sincerely,

Kimberly Grimwood  
Project Scientist

Notification Date: 7AM EST 07/10/2018

File Number: 0008220098

See instructions for  
 public burden estimates

**General Information**

1) (Select only one) ( <b>UA</b> ) <b>NE</b> – New <b>UA</b> – Update of Application <b>WD</b> – Withdrawal of Application	
2) If this application is for an Update or Withdrawal, enter the file number of the pending application currently on file.	File Number: <b>0008220098</b>

**Applicant Information**

3) FCC Registration Number (FRN): <b>0024990301</b>
4) Name: <b>GST Capital Partners, LLC/Delta Oaks Group, PLLC</b>

**Contact Name**

5) First Name: <b>John</b>	6) MI:	7) Last Name: <b>Bean</b>	8) Suffix:
9) Title:			

**Contact Information**

10) P.O. Box:	<b>And /Or</b>	11) Street Address: <b>330 Marshall Street, Suite 300</b>	
12) City: <b>Shreveport</b>		13) State: <b>LA</b>	14) Zip Code: <b>71101</b>
15) Telephone Number: <b>(318)302-4830</b>		16) Fax Number:	
17) E-mail Address: <b>towers@gulfsouthtowers.com</b>			

**Consultant Information**

18) FCC Registration Number (FRN): <b>0011724176</b>
19) Name: <b>NWB Environmental Consulting, LLC on behalf of Trileaf Corporation</b>

**Principal Investigator**

20) First Name: <b>Michelle</b>	21) MI:	22) Last Name: <b>Noble</b>	23) Suffix:
24) Title: <b>Archaeologist</b>			

**Principal Investigator Contact Information**

25) P.O. Box:	<b>And /Or</b>	26) Street Address: <b>3033 Fifth Avenue Suite 210</b>	
27) City: <b>San Diego</b>		28) State: <b>CA</b>	29) Zip Code: <b>92103</b>
30) Telephone Number: <b>(480)850-0575</b>		31) Fax Number:	
32) E-mail Address: <b>k.grimwood@trileaf.com</b>			

**Professional Qualification**

33) Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( ) <u>N</u> o
34) Areas of Professional Qualification: ( <input checked="" type="checkbox"/> ) Archaeologist ( ) Architectural Historian ( ) Historian ( ) Architect ( ) Other (Specify) _____	

**Additional Staff**

35) Are there other staff involved who meet the Professional Qualification Standards of the Secretary of the Interior?	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( ) <u>N</u> o
--	--

If "YES," complete the following:

36) First Name: <b>Susan</b>	37) MI:	38) Last Name: <b>Hector</b>	39) Suffix:
40) Title:			
41) Areas of Professional Qualification: ( <input checked="" type="checkbox"/> ) Archaeologist ( <input checked="" type="checkbox"/> ) Architectural Historian ( ) Historian ( ) Architect ( ) Other (Specify) _____			

36) First Name: <b>Paige</b>	37) MI:	38) Last Name: <b>Kohler</b>	39) Suffix:
40) Title:			
41) Areas of Professional Qualification: ( <input checked="" type="checkbox"/> ) Archaeologist ( ) Architectural Historian ( ) Historian ( ) Architect ( ) Other (Specify) _____			

**Tower Construction Notification System**

1) TCNS Notification Number: **170920**

**Site Information**

2) Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: (    ) <b><u>Y</u></b> es ( <b>X</b> ) <b><u>N</u></b> o		
3) Site Name: <b>Piedmont Corp Yard</b>		
4) Site Address: <b>898 Red Rock Road</b>		
5) Detailed Description of Project:		
6) City: <b>Piedmont</b>	7) State: <b>CA</b>	8) Zip Code: <b>94611</b>
9) County/Borough/Parish: <b>ALAMEDA</b>		
10) Nearest Crossroads: <b>Red Rock Road &amp; Moraga Avenue</b>		
11) <b>NAD 83</b> Latitude (DD-MM-SS.S): <b>37-49-55.2</b> ( <b>X</b> ) <b><u>N</u></b> or (    ) <b><u>S</u></b>		
12) <b>NAD 83</b> Longitude (DD-MM-SS.S): <b>122-13-46.9</b> (    ) <b><u>E</u></b> or ( <b>X</b> ) <b><u>W</u></b>		

**Tower Information**

13) Tower height above ground level (include top-mounted attachments such as lightning rods): <u>30.5</u> (    ) Feet ( <b>X</b> ) Meters	
14) Tower Type (Select One): <input type="checkbox"/> Guyed lattice tower <input type="checkbox"/> Self-supporting lattice <input checked="" type="checkbox"/> Monopole <input type="checkbox"/> Other (Describe):	

**Project Status**

15) Current Project Status (Select One):	
<input checked="" type="checkbox"/> Construction has not yet commenced	
<input type="checkbox"/> Construction has commenced, but is not completed	Construction commenced on: _____
<input type="checkbox"/> Construction has been completed	Construction commenced on: _____
Construction completed on: _____	



**Determination of Effect**

14) Direct Effects (Select One):

- No Historic Properties in Area of Potential Effects (APE)
- No Effect on Historic Properties in APE
- No Adverse Effect on Historic Properties in APE
- Adverse Effect on one or more Historic Properties in APE

15) Visual Effects (Select One):

- No Historic Properties in Area of Potential Effects (APE)
- No Effect on Historic Properties in APE
- No Adverse Effect on Historic Properties in APE
- Adverse Effect on one or more Historic Properties in APE

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	( <input checked="" type="checkbox"/> ) <u>Y</u> es (    ) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>170920</u> Number of Tribes/NHOs: <u>8</u>	
2b) Tribes/NHOs contacted through an alternate system:    Number of Tribes/NHOs: <u>0</u>	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>California Valley Miwok Tribe</b>

**Contact Name**

5) First Name: <b>Anjelica</b>	6) MI:	7) Last Name: <b>Paulk</b>	8) Suffix:
9) Title: <b>Vice Chairperson</b>			

**Dates & Response**

10) Date Contacted <u>04/18/2018</u>	11) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply	
(    ) Replied/No Interest	
(    ) Replied/Have Interest	
(    ) Replied/Other	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Eastern Shoshone Tribe</b>

**Contact Name**

5) First Name: <b>Josh</b>	6) MI:	7) Last Name: <b>Mann</b>	8) Suffix:
9) Title: <b>THPO</b>			

**Dates & Response**

10) Date Contacted <u>04/19/2018</u>	11) Date Replied <u>04/19/2018</u>
(    ) No Reply	
(    ) Replied/No Interest	
(    ) Replied/Have Interest	
( <input checked="" type="checkbox"/> ) Replied/Other	

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?		( <input checked="" type="checkbox"/> ) <u>Yes</u> ( <input type="checkbox"/> ) <u>No</u>
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>170920</u>	Number of Tribes/NHOs: <u>8</u>	
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: <u>0</u>	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Los Coyotes Reservation</b>

**Contact Name**

5) First Name: <b>Shane</b>	6) MI:	7) Last Name: <b>Chapparosa</b>	8) Suffix:
9) Title: <b>Chairman</b>			

**Dates & Response**

10) Date Contacted <u>04/19/2018</u>	11) Date Replied _____
<input checked="" type="checkbox"/> No Reply <input type="checkbox"/> Replied/No Interest <input type="checkbox"/> Replied/Have Interest <input type="checkbox"/> Replied/Other	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Northwestern Band of Shoshone Nation</b>

**Contact Name**

5) First Name: <b>Montana &amp; Associates</b>	6) MI:	7) Last Name: <b>LLC</b>	8) Suffix:
9) Title: <b>Attorney</b>			

**Dates & Response**

10) Date Contacted <u>04/18/2018</u>	11) Date Replied <u>04/18/2018</u>
<input type="checkbox"/> No Reply <input type="checkbox"/> Replied/No Interest <input checked="" type="checkbox"/> Replied/Have Interest <input type="checkbox"/> Replied/Other	

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	( <input checked="" type="checkbox"/> ) <u>Y</u> es (    ) <u>N</u> o
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>170920</u> Number of Tribes/NHOs: <u>8</u>	
2b) Tribes/NHOs contacted through an alternate system:    Number of Tribes/NHOs: <u>0</u>	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Santa Rosa Rancheria Tachi Yokut Tribe</b>

**Contact Name**

5) First Name: <b>Hector (Lalo)</b>	6) MI:	7) Last Name: <b>Franco</b>	8) Suffix:
9) Title: <b>Cultural Department Director</b>			

**Dates & Response**

10) Date Contacted <u>04/18/2018</u>	11) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply	
(    ) Replied/No Interest	
(    ) Replied/Have Interest	
(    ) Replied/Other	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Scotts Valley Rancheria</b>

**Contact Name**

5) First Name: <b>Shannon</b>	6) MI:	7) Last Name: <b>Ford</b>	8) Suffix:
9) Title: <b>Housing Manager</b>			

**Dates & Response**

10) Date Contacted <u>04/19/2018</u>	11) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply	
(    ) Replied/No Interest	
(    ) Replied/Have Interest	
(    ) Replied/Other	

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	( <input checked="" type="checkbox"/> ) <u>Yes</u> ( <input type="checkbox"/> ) <u>No</u>
2a) Tribes/NHOs contacted through TCNS Notification Number: <u>170920</u> Number of Tribes/NHOs: <u>8</u>	
2b) Tribes/NHOs contacted through an alternate system:      Number of Tribes/NHOs: <u>0</u>	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Skull Valley Band of Goshute Indians</b>

**Contact Name**

5) First Name: <b>Montana &amp; Associates</b>	6) MI:	7) Last Name: <b>LLC</b>	8) Suffix:
9) Title: <b>Attorney</b>			

**Dates & Response**

10) Date Contacted <u>04/19/2018</u>	11) Date Replied <u>04/18/2018</u>
( <input type="checkbox"/> ) No Reply	
( <input type="checkbox"/> ) Replied/No Interest	
( <input checked="" type="checkbox"/> ) Replied/Have Interest	
( <input type="checkbox"/> ) Replied/Other	

**Tribe/NHO Contacted Through TCNS**

3) Tribe/NHO FRN:
4) Tribe/NHO Name: <b>Wilton Rancheria</b>

**Contact Name**

5) First Name: <b>Antonio</b>	6) MI:	7) Last Name: <b>Ruiz</b>	8) Suffix:
9) Title: <b>Tribal Historic Preservation Officer</b>			

**Dates & Response**

10) Date Contacted <u>04/19/2018</u>	11) Date Replied _____
( <input checked="" type="checkbox"/> ) No Reply	
( <input type="checkbox"/> ) Replied/No Interest	
( <input type="checkbox"/> ) Replied/Have Interest	
( <input type="checkbox"/> ) Replied/Other	

**Tribe/NHO Information**

1) FCC Registration Number (FRN):
2) Name:

**Contact Name**

3) First Name:	4) MI:	5) Last Name:	6) Suffix:
7) Title:			

**Contact Information**

8) P.O. Box:	<b>And /Or</b>	9) Street Address:		
10) City:		11) State:	12) Zip Code:	
13) Telephone Number:		14) Fax Number:		
15) E-mail Address:				
16) Preferred means of communication:  <input type="checkbox"/> E-mail  <input type="checkbox"/> Letter  <input type="checkbox"/> Both				

**Dates & Response**

17) Date Contacted _____	18) Date Replied _____
<input type="checkbox"/> No Reply  <input type="checkbox"/> Replied/No Interest  <input type="checkbox"/> Replied/Have Interest  <input type="checkbox"/> Replied/Other	

**Historic Properties**

**Properties Identified**

1) Have any historic properties been identified within the APEs for direct and visual effect?	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( <input type="checkbox"/> ) <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

**Historic Property**

4) Property Name: <b>Piedmont Community Church</b>
5) SHPO Site Number: <b>P-01-010920</b>

**Property Address**

6) Street Address: <b>400 Highland Avenue</b>		
7) City: <b>Piedmont</b>	8) State: <b>CA</b>	9) Zip Code: <b>94611</b>
10) County/Borough/Parish: <b>ALAMEDA</b>		

**Status & Eligibility**

11) Is this property listed on the National Register? Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
12) Is this property eligible for listing on the National Register? Source: <b>NRHP Status Code of 3S and NWB Environmental Services, LLC</b>	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( <input type="checkbox"/> ) <u>N</u> o
13) Is this property a National Historic Landmark?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

14) Direct Effects (Select One): ( <input checked="" type="checkbox"/> ) No Effect on this Historic Property in APE ( <input type="checkbox"/> ) No Adverse Effect on this Historic Property in APE ( <input type="checkbox"/> ) Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One): ( <input checked="" type="checkbox"/> ) No Effect on this Historic Property in APE ( <input type="checkbox"/> ) No Adverse Effect on this Historic Property in APE ( <input type="checkbox"/> ) Adverse Effect on this Historic Property in APE

**Historic Properties**

**Properties Identified**

1) Have any historic properties been identified within the APEs for direct and visual effect?	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( <input type="checkbox"/> ) <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

**Historic Property**

4) Property Name: <b>Mountain View Cemetery District</b>
5) SHPO Site Number: <b>P-01-011355</b>

**Property Address**

6) Street Address: <b>Eastern extent of Piedmont Avenue</b>		
7) City: <b>Piedmont</b>	8) State: <b>CA</b>	9) Zip Code: <b>94611</b>
10) County/Borough/Parish: <b>ALAMEDA</b>		

**Status & Eligibility**

11) Is this property listed on the National Register?  Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
12) Is this property eligible for listing on the National Register?  Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
13) Is this property a National Historic Landmark?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

14) Direct Effects (Select One):  <input checked="" type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One):  <input checked="" type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE



**Historic Properties**

**Properties Identified**

1) Have any historic properties been identified within the APEs for direct and visual effect?	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( <input type="checkbox"/> ) <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

**Historic Property**

4) Property Name: <b>Martinez House and Studio</b>
5) SHPO Site Number: <b>P-01-003692</b>

**Property Address**

6) Street Address: <b>320 Scenic Avenue</b>		
7) City: <b>Oakland</b>	8) State: <b>CA</b>	9) Zip Code: <b>94611</b>
10) County/Borough/Parish: <b>ALAMEDA</b>		

**Status & Eligibility**

11) Is this property listed on the National Register?  Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
12) Is this property eligible for listing on the National Register?  Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
13) Is this property a National Historic Landmark?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

14) Direct Effects (Select One):  <input checked="" type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One):  <input checked="" type="checkbox"/> No Effect on this Historic Property in APE <input type="checkbox"/> No Adverse Effect on this Historic Property in APE <input type="checkbox"/> Adverse Effect on this Historic Property in APE

**Historic Properties**

**Properties Identified**

1) Have any historic properties been identified within the APEs for direct and visual effect?	( <input checked="" type="checkbox"/> ) <u>Y</u> es ( <input type="checkbox"/> ) <u>N</u> o
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

**Historic Property**

4) Property Name: <b>N/A</b>
5) SHPO Site Number: <b>P-01-006731</b>

**Property Address**

6) Street Address: <b>1900 Oakland Avenue</b>		
7) City: <b>Piedmont</b>	8) State: <b>CA</b>	9) Zip Code: <b>94611</b>
10) County/Borough/Parish: <b>ALAMEDA</b>		

**Status & Eligibility**

11) Is this property listed on the National Register? Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
12) Is this property eligible for listing on the National Register? Source: _____	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o
13) Is this property a National Historic Landmark?	( <input type="checkbox"/> ) <u>Y</u> es ( <input checked="" type="checkbox"/> ) <u>N</u> o

14) Direct Effects (Select One): ( <input checked="" type="checkbox"/> ) No Effect on this Historic Property in APE ( <input type="checkbox"/> ) No Adverse Effect on this Historic Property in APE ( <input type="checkbox"/> ) Adverse Effect on this Historic Property in APE
15) Visual Effects (Select One): ( <input checked="" type="checkbox"/> ) No Effect on this Historic Property in APE ( <input type="checkbox"/> ) No Adverse Effect on this Historic Property in APE ( <input type="checkbox"/> ) Adverse Effect on this Historic Property in APE

**Local Government Agency**

1) FCC Registration Number (FRN):
2) Name: <b>City of Piedmont Public Works Department</b>

**Contact Name**

3) First Name: <b>Pierce</b>	4) MI:	5) Last Name: <b>MacDonald-Powell</b>	6) Suffix:
7) Title: <b>Senior Planner</b>			

**Contact Information**

8) P.O. Box:	<b>And /Or</b>	9) Street Address: <b>120 Vista Avenue</b>
10) City: <b>Piedmont</b>	11) State: <b>CA</b>	12) Zip Code: <b>94611</b>
13) Telephone Number: <b>(510)420-3063</b>	14) Fax Number:	
15) E-mail Address: <b>pmacdonald@piedmont.ca.gov</b>		
16) Preferred means of communication:		
<input checked="" type="checkbox"/> E-mail <input type="checkbox"/> Letter <input type="checkbox"/> Both		

**Dates & Response**

17) Date Contacted <b>04/13/2018</b>	18) Date Replied <b>04/16/2018</b>
<input type="checkbox"/> No Reply <input type="checkbox"/> Replied/No Interest <input type="checkbox"/> Replied/Have Interest <input checked="" type="checkbox"/> Replied/Other	
<b>Noted that Mountain View Cemetery is located to the west of the project area. No other comments</b>	

**Additional Information**

19) Information on local government's role or interest (optional):
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**Other Consulting Parties Contacted**

1) Has any other agency been contacted and invited to become a consulting party?	(    ) <u>Y</u> es ( <b>X</b> ) <u>N</u> o
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**Consulting Party**

2) FCC Registration Number (FRN):
3) Name:

**Contact Name**

4) First Name:	5) MI:	6) Last Name:	7) Suffix:
8) Title:			

**Contact Information**

9) P.O. Box:	<b>And /Or</b>	10) Street Address:
11) City:	12) State:	13) Zip Code:
14) Telephone Number:	15) Fax Number:	
16) E-mail Address:		
17) Preferred means of communication:		
(    ) E-mail		
(    ) Letter		
(    ) Both		

**Dates & Response**

18) Date Contacted _____	19) Date Replied _____
(    ) No Reply	
(    ) Replied/No Interest	
(    ) Replied/Have Interest	
(    ) Replied/Other	

**Additional Information**

20) Information on other consulting parties' role or interest (optional):
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**Designation of SHPO/THPO**

1) Designate the Lead State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) based on the location of the tower.

**SHPO/THPO**

Name: <u>California Office of Historic Preservation</u>
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2) You may also designate up to three additional SHPOs/THPOs if the APEs include multiple states. If the APEs include other countries, enter the name of the National Historic Preservation Agency and any state and provincial Historic Preservation Agency.

SHPO/THPO Name: _____
SHPO/THPO Name: _____
SHPO/THPO Name: _____

**Certification**

I certify that all representations on this FCC Form 620 Submission Packet and the accompanying attachments are true, correct, and complete.

**Party Authorized to Sign**

First Name: <b>Kimberly</b>	MI:	Last Name: <b>Grimwood</b>	Suffix:
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Signature: <b>Kimberly Grimwood</b>	Date: <b>07/09/2018</b>
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**FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.**

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).**

**Attachments :**

Type	Description	Date Entered
Resumes/Vitae	<a href="#">Resumes</a>	05/22/2018
Map Documents	<a href="#">Maps</a>	05/22/2018
Area of Potential Effects	<a href="#">APE</a>	05/22/2018
Tribal/NHO Involvement	<a href="#">Tribal</a>	05/22/2018
Local Government Involvement	<a href="#">Local Govt</a>	05/22/2018
Public Involvement	<a href="#">Public Involvement</a>	05/22/2018
Historic Properties for Visual Effects	<a href="#">Historical Properties Visual</a>	05/22/2018
Historic Properties for Direct Effects	<a href="#">Historical Properties Direct</a>	05/22/2018
Photographs	<a href="#">Photos</a>	05/22/2018
Additional Site Information	<a href="#">Site Plans</a>	05/22/2018
State-Specific Forms	<a href="#">State-Specific</a>	05/22/2018

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 1. Consultant Information**

**Provide a current copy of the resume or curriculum vitae for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.**

A current copy of the resume for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

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**Susan M. Hector, Ph.D., RPA**  
**Principal Investigator, NWB Environmental Services**  
**Anthropologist**

**Total Years of Experience:** 40

**Employment History:**

2014- Principal Investigator, NWB Environmental Services  
2013-2014 Instructor, Anthropology Department, San Diego City College  
2012-2013 Manager, Environmental Programs, SDG&E  
2009-2012 Principal Environmental Specialist, Cultural Resources, SDG&E and SCG  
2005-2008 Principal/Senior Archaeologist, ASM Affiliates, Inc., Carlsbad, California  
2001-2005 Principal, Susan Hector Consulting, San Diego, California  
1999-2001 Director, County of San Diego Department of Parks and Recreation, San Diego, California  
1996-1999 Chief, County of San Diego Department of Parks and Recreation, San Diego, California  
1992-1996 Senior Project Manager, County of San Diego Department of Parks and Recreation, San Diego, California  
1989-1992 Project Manager, County of San Diego Department of Parks and Recreation, San Diego, California  
1980-1989 Director of Cultural Resources, RECON, San Diego, California  
1977-1980 Senior Museum Preparator, UCLA Museum of Cultural History (now the Fowler Museum), Los Angeles, California  
1974-1980 Research Collaborator, UCLA Institute of Archaeology, Los Angeles, California  
1973-1974 Archaeological Field Assistant, UCLA Archaeological Survey, Los Angeles, CA

**Education:**

Ph.D. 1984/Anthropology/University of California, Los Angeles  
M.A. 1978/Anthropology/University of California, Los Angeles  
B.A. 1975/Anthropology/University of California, Los Angeles (cum laude)

**Additional Training:**

2011 Fiber Preparation and Processing Workshop. Celia Quinn  
2010-2011 Spinning. Margaret Tyler, Grossmont Adult School  
2008 Section 106 Essentials. Advisory Council on Historic Preservation  
2006 Section 106: How to Negotiate and Write Agreements, National Preservation



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	Institute
2005	Kumeyaay Ethnobotany. Kumeyaay Community College, Sycuan Reservation
2005	Gourd Rattle Making and Usage. Agua Caliente Culture Museum
2004	Traditional Southern California Basketweaving Workshop. California Indian Basketweavers Association
2002	Identification and Management of Traditional Cultural Places, National Preservation Institute
2002	Section 106: A Review for Experienced Practitioners, National Preservation Institute

**Registrations:**

Register of Professional Archaeologists (RPA)  
Orange County  
County of Los Angeles  
County of San Diego  
City of San Diego  
Bureau of Land Management, Permit for Archaeological Investigations, SDG&E/SCG areas

**Professional Memberships:**

2008-	State Historic Resources Commission, Archaeology Subcommittee
2004-2006	Governor's Appointee/Governing Board, San Diego River Conservancy
2002-2005	Board of Directors/San Diego Archaeology Center
2002-2005	Board of Directors/Planning and Research Collaborative
2001-2005	Board of Directors/Save Our Heritage Organisation (SOHO)
2001-2003	Communications Committee Chairman/Altrusa International Service Club
2001-2005	Advisory Board/Volcan Mountain Preserve Foundation
2000-2004	Editorial Board/Archaeological Conservancy
1999-2004	Board of Directors/Presidio Park Council
1998-2000	ad hoc Member/City of Oceanside Historical Site Board
1987-1995	Member/City of San Diego Historical Site Board
1987-1989	Founder/Society for California Archaeology (SCA) Proceedings
1989-1995	Editor-in-chief/Society for California Archaeology (SCA) Proceedings
1995	Board of Advisors/Society for Amateur Scientists
1987-present	Member/Sigma Xi
1987-1991	Coordinator/South Coastal Information Center, San Diego State University
1987-1988	President/Society for California Archaeology (SCA)
1986-1987	Southern Vice President/Society for California Archaeology (SCA)

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**Awards/Commendations:**

2014	Lifetime Achievement Award, Society for California Archaeology
2012	Outstanding Achievement Award, Environmental Services, SDG&E
2012	Nomination for Governor's Award (Sempra Cultural Resources Screening Tool)
2011	Governor's Award (co-authoring SB 1034, Cal-ARPA)
2011	ACRA Award in the Private Sector (Sempra Cultural Resources Screening Tool)
2011	Special Recognition Award, Society for California Archaeology (SB 1034 – CalARPA)
2009	Presidential Commendation, Society for California Archaeology (SCA Proceedings founding and editorship)
2007	Outstanding Environmental Resource Document, Association of Environmental Professionals (SDG&E Cultural Resources Training Video)
2003	Award of Excellence for Historic Preservation, City of San Diego Historical Resources Board (San Dieguito River Valley Archaeology Project)
2002	San Diego County Department of Parks and Recreation, Departmental Recognition as Director
2000	California Preservation Foundation (CPF) Preservation Design Award (restoration of the Spring House at Los Peñasquitos Ranch House National Register District)
2000	People in Preservation (PIP) Award from Save Our Heritage Organisation (SOHO) for the restoration of the Spring House, Los Penasquitos
2000	Certificate of Appreciation from Assembly Member Susan Davis (restoration of the Spring House, Los Penasquitos)
1998	Governor's Award (restoration of Vallecito Stage Station)
1997	Governor's Award (restoration of Rancho Guajome Adobe)
1997	California Preservation Foundation (CPF) Preservation Design Award (restoration of Rancho Guajome Adobe)
1996	Orchid Award from the AIA (restoration of Rancho Guajome Adobe)
1996	Orchid Award from the AIA (restoration of Vallecito Stage Station)
1994	Park Project Manager of the Year, County of San Diego
1994	Outstanding Achievement, County of San Diego, for Los Peñasquitos Ranch House restoration and research (with Mary Ward)
1992	Park Project Manager of the Year, County of San Diego
1991	Park Project Manager of the Year, County of San Diego

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**Clearances:**

MCB Camp Pendleton

MCAS Miramar

Edwards AFB

Naval Base San Diego

**Professional Profile:**

Dr. Susan Hector has 40 years of experience with prehistoric, historic, and ethnographic cultural resources in southern California. In addition, she has substantial management experience beyond the cultural resources subject area. She served as the Director for San Diego County Department of Parks and Recreation, and the Environmental Programs Manager for San Diego Gas & Electric Company. Dr. Hector has taught classes in anthropology and archaeology at San Diego City College. She is currently the Principal Investigator for NWB Environmental Services, managing cultural resources projects for the company.

Dr. Hector has prepared more than 250 compliance technical reports for federal, state, and local agencies. She has authored many scientific articles and publications, and made technical and popular presentations on prehistoric and historic archaeology and has professional experience with the cultural resources of the Great Basin, American Southwest, and California. She has special expertise in the development of management plans for cultural resources located within undeveloped areas such as utility corridors, open space preserves, or parks. Dr. Hector worked for the County of San Diego Department of Parks and Recreation for 12 years, ending as the Director of the department. While working for the County of San Diego, Dr. Hector successfully obtained grants for historic preservation and natural resource conservation. She was directly responsible for the development of a cultural resources management program for the County. From 2009 – 2012, she was a Principal Environmental Specialist, Cultural Resources, and provided services for both San Diego Gas and Electric and Southern California Gas Company, where she developed their first cultural resource management program. A significant part of this program is its GIS capabilities to screen projects for impacts to archaeological sites. She developed the Arc Avoid GIS tool that is used to manage operations and maintenance work within the SDG&E service area, and the company received an ACRA award in 2011 for her work.

Dr. Hector has directed and completed archaeological and historical research projects, field surveys and inventories, test programs, and data recovery projects throughout the west. She has special expertise in ethnobotany, shellfish analysis, lithic tool analysis, historic artifacts, ethnography and ethnohistory, and hunter-gatherer special activity areas. Her diverse background also includes museum curation and project management. She has also taught classes in anthropology and archaeology at the college level in Los Angeles and San Diego.

Dr. Hector successfully completed five National Register nominations (resulting in listing in the National Register of Historic Places), and a sixth will be submitted in 2014. Four of the six include traditional cultural landscapes, and were prepared in collaboration with local Native American tribes.

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**Michelle D. Noble, M.A.**  
**NWB Senior Archaeologist**

**Total Years of Experience:** 15

**Employment History:**

2017- Senior Archaeologist, NWB Environmental Services, LLC  
2013- Archaeologist & Museum Property Specialist, US Bureau of Reclamation,  
Department of the Interior, Mid-Pacific Region, Sacramento, California  
2009 Field Technician, Post Buckley Schuh and Jernigan (Atkens), Sacramento,  
CA  
2003-2013 Staff Archaeologist, Collections Manager, Field Director, Archaeological  
Research Center, California State University, CA

**Education:**

M.A. 2011/Anthropology/ California State University, Sacramento  
B.A. 2003/English Literature/ California State University, Fresno  
2003/Anthropology/ California State University, Fresno  
(*Summa Cum Laude*)

**Additional Training:**

2017 Section 106 Consultations from the Department of the Interior  
2017 Working in Indian Country, from the Bureau of Reclamation  
2016 NAGPRA Training for Archaeologists from the National Center for Preservation  
Technology and Training and the National Park Service  
2016 GIS Training from Esri, Sacramento, CA  
2015 Museum Property Management from the Department of the Interior  
2015 GIS training from Esri, Sacramento, CA  
2015 Section 106 of the National Historic Preservation Act from the National Preservation  
Institute  
2014 NEPA Training, Bureau of Reclamation  
2003 Archaeology Field School, California State University, Fresno, CA  
2002 Archaeology Field School, California State University, Fresno, CA

**Professional Memberships:**

Society of American Archaeology  
Society for California Archaeology  
Great Basin Anthropological Association

**Professional Profile:**

Ms. Noble is an archaeologist who has 15 years of experience with prehistoric and historic cultural resources in California and Nevada. She has directed and completed archaeological and historical research projects, field surveys and inventories, test programs, and data recovery projects throughout California and Nevada. Locations of work include, the Central Coast, northern redwood country, along the Trinity River, Sacramento and the Delta, the Sierra Nevada foothills and mountains, the Central Valley, the Owens Valley and the whole of the Inyo/Mono region, Napa Valley, and Lahontan Basin.

She has directed graduate students and run laboratory work. She has special expertise in paleobotanical analysis, ground and battered stone analysis, artifact photography, and database creation and maintenance. Additionally, she has been trained and experienced in museum property management and NAGPRA compliance and consultations.

She has written numerous academic reports and compliance reports. She has written articles and presented at conferences and for the public. She has led field schools and taught classes to both fellow archaeologists at all levels, as well as members of the public.

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**Paige Kohler, M.A.**  
**NWB Associate Archaeologist**

**Total Years of Experience: 3**

**Employment History:**

2017- Associate Archaeologist, NWB Environmental Services, LLC  
2016-2017 Field Archaeologist, NWB Environmental Services, LLC  
2014 Archaeological Monitor, Dudek

**Education:**

M.A. 2016/Islamic & Middle Eastern Studies/ Hebrew University, Jerusalem, Israel  
B.A. 2012/Religion/ University of California, San Diego  
2012/Anthropology (focus: Archaeology)/ University of California, San Diego

**Additional Training:**

2014-2015 Archaeological Internship, W.F. Albright Institute for Archaeological Research, Jerusalem, Israel  
2011 Jordan Archaeology Field School, University of California, San Diego  
2009 Jordan Archaeology Field School, University of California, San Diego

**Professional Profile:**

Ms. Kohler is an archaeologist who has 3 years of experience with prehistoric and historic cultural resources in California. She has directed and completed archaeological and historical research projects, field surveys and inventories, test programs, and data recovery projects throughout California. Locations of work include San Diego County, Riverside County, Orange County, and Los Angeles County.

She has run laboratory work and has special expertise in ceramic analysis, ground and battered stone analysis, artifact photography, and database creation and maintenance. Additionally, she has written numerous academic reports and compliance reports.

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**Mark Abelon, M.A.**  
**NWB Archaeological Technician**

**Total Years of Experience: 8**

**Employment History:**

2013- Archaeological Technician, NWB Environmental Services, LLC  
2011-2012 History Intern, San Diego County Department of Parks and  
Recreation  
2008-2010 Instructional Assistant for Head of Department of Anthropology, San Diego  
City College

**Education:**

A.A.  
C.P.

**Additional Training:**

201-2015 Archaeological Internship, W.F. Albright Institute for Archaeological  
Research, Jerusalem, Israel  
2011 Jordan Archaeology Field School, University of California, San Diego  
2009 Jordan Archaeology Field School, University of California, San Diego

**Professional Profile:**

Ms. Kohler is an archaeologist who has 3 years of experience with prehistoric and historic cultural resources in California. She has directed and completed archaeological and historical research projects, field surveys and inventories, test programs, and data recovery projects throughout California. Locations of work include San Diego County, Riverside County, Orange County, and Los Angeles County.

She has run laboratory work and has special expertise in ceramic analysis, ground and battered stone analysis, artifact photography, and database creation and maintenance. Additionally, she has written numerous academic reports and compliance reports.



# KIMBERLY GRIMWOOD

## PROJECT SCIENTIST II

### Education

B.S. Environmental Science / Emphasis in Ecology  
The University of Arizona / Tucson, AZ

### Areas of Expertise

Ms. Grimwood has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM), as well as performing National Environmental Policy Act (NEPA) reviews for commercial real estate, lending, and wireless telecommunications projects.

Ms. Grimwood has experience executing environmental due diligence projects throughout various regions of the United States, and specializes in the Western Region.

Environmental service expertise includes the preparation and/or review of:

Phase I Environmental Site Assessments	Field Reconnaissance
Historical City Directories	Historical Topographic Maps and Aerial Imagery
Informal Section 7 Consultation	Land Use History
National Wetlands Inventory Maps	Section 106 Compliance
Flood Insurance Rate Maps	NEPA Environmental Assessments
Critical Habitat Maps	Form 620/621 Submittals
Soil Characterization	Local Government Consultation
Archaeological and Architectural Impacts	Native American Consultation

Additionally, Ms. Grimwood has experience in data collection, biological sampling, field work, and writing and proposing environmental remediation plans.

### Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person  
Adult Child Infant C.A.R.E. CPR & First Aid Certification  
Burrowing Owl Field Certification, U.S. Fish and Wild Life Service and Arizona Game and Fish  
Salt River Pima-Maricopa Indian Community Cultural Sensitivity Training



Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 2. Additional Site Information**

**Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site.**

The Piedmont Corp Yard project would involve construction of an unmanned telecommunications facility in the paved parking lot of 898 Red Rock Road, Piedmont, Alameda County, CA 94611.

The client proposes to install a 100' slimline pole by installing: (5) concrete-filled traffic bollards, (1) stepped CMU block retaining wall, (4) 8' wide double gates, one accessing each lease area, (1) 8' high chain-link fence on top of CMU block retaining wall, and underground coax/fiber lines running in a common trench adjacent to the lease areas. These installations, made of up four smaller lease areas of 216 square feet each, will take place within the greater 48' by 18' (864-square foot) equipment lease area.

The construction drawings provided by the client are included in this attachment.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

*Please refer to Appendix A for Site Plans*

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 3. Tribal and NHO Involvement**

**At an early stage in the planning process, the Nationwide Agreement requires the Applicant to gather information from appropriate Indian Tribes or Native Hawaiian Organizations (“NHOs”) to assist in the identification of Historic Properties of religious and cultural significance to them. Describe measures taken to identify Indian tribes and NHOs that may attach religious and cultural significance to Historic Properties that may be affected by the construction within the Areas of Potential Effects (“APE”) for direct and visual effects. If such Indian tribes or NHOs were identified, list them and provide a summary of contacts by either the FCC, the Applicant, or the Applicant’s representative. Provide copies of relevant documents, including correspondence. If no such Indian tribes or NHOs were identified, please explain.**

Trileaf Corporation completed the Tower Construction Notification System (TCNS) on April 17, 2018 and received the notification of interested tribes on April 20, 2018. The attached FCC Notification email lists the Tribes identified through the TCNS process. A second notice will be sent to all interested tribes/organizations, after a period of 30 days and the consultation process will continue per the FCC’s guidelines. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

Applicant’s Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

**From:** towernotifyinfo@fcc.gov  
**To:** [tribal](#)  
**Cc:** [tcnsweekly@fcc.gov](#)  
**Subject:** NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #5735068  
**Date:** Friday, April 20, 2018 2:05:00 AM

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Dear Sir or Madam:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the information you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the information that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The information you provided was forwarded to the following Tribal Nations and NHOs. If a Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Declaratory Ruling released on October 6, 2005 (FCC 05-176).

1. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY - [jmann@easternshoshone.org](mailto:jmann@easternshoshone.org); [falene.russette@iresponse106.com](mailto:falene.russette@iresponse106.com) - 307-438-0094  
Details: The Eastern Shoshone Tribe has established a new online procedure for FCC TCNS review/consultation. Online submissions can now be completed at <http://app.tribal106.com>. The data platform is currently being administered by a third party who are providing consultation servicing through the online system on behalf of the Eastern Shoshone Tribe. For questions, please call Shastelle Swan at 406-395-4700

Based on the location of the proposed project and the pole(s) that you will be constructing as part of the Section 106 process in our particular aboriginal homelands, we are REQUESTING TO BE CONSULTED on this proposed project.

Please utilize the Tribal 106 NHPA consultation processing system website. Online submissions can be completed at <http://app.tribal106.com>

The Eastern Shoshone Tribe through the Historic Preservation Department has established a fee of \$400.00 per consultation. We are only accepting checks at this time. All checks should be mailed to the following address:

I-Response LLC - EST  
PO Box 87  
Box Elder, MT 59521

If you have questions, please feel free to contact either Mr. Josh Mann, THPO, at [jmann@easternshoshone.org](mailto:jmann@easternshoshone.org) or Shastelle Swan, AR Clerk, at [shastelle.swan@iresponse106.com](mailto:shastelle.swan@iresponse106.com).

Sincerely,  
Josh Mann, THPO  
Eastern Shoshone Tribe

2. Attorney Montana & Associates LLC - Skull Valley Band of Goshute Indians - N12923 N Prairie Rd Osseo, WI - [skullvalleybandofgoshutefcctns@outlook.com](mailto:skullvalleybandofgoshutefcctns@outlook.com) - 605-881-1227  
Details: The Skull Valley Band of Goshutes as of September 1st 2017 have new review procedures and fees.

Please send a letter via email to [Skullvalleybandofgoshutefcctns@outlook.com](mailto:Skullvalleybandofgoshutefcctns@outlook.com) to initiate consultation.

The Skull Valley Band of Goshute has established fees for our review of proposed structures and or co-locations in areas within our exterior boundaries, treaty lands and aboriginal boundaries.

Working with the FCC in solving the serious issue of non compliant towers and creating a working relationship with Montana & Associates LLC we now require the following fees.

\$1500 for all new tower builds.

\$1000 for all Co-locations.

\$1500 for co-locations on non-compliant towers or antenna structures(if you have no past clearance letter from a SHPO or THPO to prove it went through the 106 process under NHPA it is a non compliant tower)

Surveys and or document retrieval done by our office will cost \$1000 inside the state of Utah. Surveys and or document retrieval done outside the state of Utah will be \$2000. It is important to include all the required information listed above to prevent any surveys/travel being done by our office.

3. Attorney Montana & Associates LLC - Northwestern Band of Shoshone Nation - N 12923 N. Prairie Rd Osseo, WI - [Northwesternbandshoshonetcnsfcc@outlook.com](mailto:Northwesternbandshoshonetcnsfcc@outlook.com) - 605-881-1227  
Details: The Northwestern Band of the Shoshone Nation has review procedures which includes fees.  
Please send a letter via email to [Northwesternbandshoshonetcnsfcc@outlook.com](mailto:Northwesternbandshoshonetcnsfcc@outlook.com) to initiate the 106 consultation process.

Thank you.

Montana & Associates LLC  
N12923 North Prairie Rd  
Osseo, WI 54758  
1-605-881-1227

4. Chairman Shane Chapparosa - Los Coyotes Reservation - (PO Box: 189) Warner Springs, CA - los\_coyotes@ymail.com; loscoyotes\_ta@yahoo.com - 760-782-0711

Details: If the Applicant receives no response from the Los Coyotes Reservation within 30 days after notification through TCNS, the Los Coyotes Band of Indians has no interest in participating in pre-construction review for the proposed site. The Applicant, however, must immediately notify the Los Coyotes Band of Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. Cultural Department Director Hector (Lalo) Franco - Santa Rosa Rancheria Tachi Yokut Tribe - 16825 Alkali Dr Lemoore, CA - HFranco@tachi-yokut-nsn.gov - 559-924-1278

6. Housing Manager Shannon Ford - Scotts Valley Rancheria - 1005 Parallel Drive Lakeport, CA - sford@svpomo.org - 707-263-4220

7. Vice Chairperson Anjelica Paulk - California Valley Miwok Tribe - 4620 Shippee Lane Stockton, CA - office@cvmt.net - 209-931-4567

Details: The California Valley Miwok Tribe REQUIRES a short project description for each proposed project. In the project description, please describe the extent of the work to be done, and please let us know if there will be any ground disturbance. If you are unable to attach the project description to your TCNS notification, please e-mail it to: office@cvmt.net. Please list the TCNS number on any e-mails. Thank you.

Sylvia Burley, Chairperson  
California Valley Miwok Tribe

8. Tribal Historic Preservation Officer Antonio Ruiz - Wilton Rancheria - 9728 Kent Street Elk Grove, CA - aruiz@wiltonrancheria-nsn.gov; tribaloffice@wiltonrancheria-nsn.gov - 916-683-6000 (ext: 2005)

Details: Wilton Rancheria utilizes the Cultural Resources Officer/ Tribal Historic Preservation Officer (THPO) to assist in the following process;

"Executive Order 13175- Consultation and Coordination with Indian Tribal Governments: Section 5 (b) To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implication, that imposes substantial direct compliance costs on Indian tribal governments, and that is not required by statute, unless: (1) funds necessary to pay the direct costs incurred by the Indian tribal government or the tribe in complying with the

regulation are provided by the federal government."

Fee Schedule updated January 12, 2018:

Please remit payment within 30 days following receipt of this notification.

2018 Mail or Web Based Document Assessment and Review- \$650.00.

2018 On Site Investigation- \$550.00 each visit plus travel expenses per Inspector.

2018 Monitoring Rates:

Native American Inspector, Project Manager, Antonio Ruiz Jr.-\$159.14 Per Hour

Native American Monitor, Staff, TBD- \$127.31 Per Hour

Archaeological Technician, TBD- \$127.31 Per Hour

Please send hard and electronic copies of all notifications, cultural resources reports as they are prepared, reviewed, and finalized. In addition, please include the Review Fee (\$650.00 usd) check.

For more information please contact Antonio Ruiz, Cultural Resources Officer/Tribal Historic Preservation Officer (THPO).

Phone: (916) 683-6000 ext. 2005

Fax: (916) 683-6015

Email: aruiz@wiltonrancheria-nsn.gov

Copy (Cc) email: esilva@wiltonrancheria-nsn.gov

Please make all requested payments out to Wilton Rancheria and mailed to the attention of the Cultural Preservation Department at 9728 Kent Street, Elk Grove, California 95624. Invoice/TCNS numbers must be included on the memo line of the check to assist with processing.

The information you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA.

9. Deputy SHPO William Collins - Arizona State Parks - 1300 West Washington Phoenix, AZ -  
wcollins@pr.state.az.us - 602-542-4174

"Exclusions" above set forth language provided by the Tribal Nation or SHPO. These exclusions may indicate types of PTC wayside pole notifications that the Tribal Nation or SHPO does not wish to review. TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. Exclusions may also set forth policies or procedures of a particular Tribal Nation or SHPO (for example, types of information that a Tribal Nation routinely requests, or a policy that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above opened and reviewed an electronic

or regular mail notification. If you learn any of the above contact information is no longer valid, please contact the FCC. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 04/17/2018  
Notification ID: 170920  
Tower Owner Individual or Entity Name: Delta Oaks Group, PLLC  
Consultant Name: Mindi L Okai  
Street Address: 10845 Olive Blvd.  
Suite 260  
City: St. Louis  
State: MISSOURI  
Zip Code: 63141  
Phone: 314-997-6111  
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole  
Latitude: 37 deg 49 min 55.2 sec N  
Longitude: 122 deg 13 min 46.9 sec W  
Location Description: 898 Red Rock Road  
City: Piedmont  
State: CALIFORNIA  
County: ALAMEDA  
Detailed Description of Project: Legal Description: No Township Found.  
Ground Elevation: 126.9 meters  
Support Structure: 30.5 meters above ground level  
Overall Structure: 30.5 meters above ground level  
Overall Height AMSL: 157.4 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic mail form located on the FCC's website at:

<http://wireless.fcc.gov/outreach/notification/contact-fcc.html>.

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8 a.m. to 7:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,  
Federal Communications Commission



Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 4. Local Government**

- a. If any local government has been contacted and invited to become a consulting party pursuant to Section V.A. of the Nationwide Programmatic Agreement, list the local government agencies contacted. Provide a summary of contacts and copies of any relevant documents (e.g., correspondence or notices).**

On April 13, 2018, Mr. Pierce Macdonald-Powell, Senior Planner for the City of Piedmont Public Works Department, was notified of the proposed project and has been invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. On April 16, 2018, Mr. Macdonald-Powell responded to Trileaf stating that the Mountain View Cemetery is a historic resource located near the site, and that Trileaf can reference Section 8 of the General Plan and Housing Element for the City of Piedmont. Trileaf reviewed Section 8 of the plan and determined that the proposed project area is not located within a historic district. A copy of Trileaf Corporation's correspondence with the local government's office is attached.

- b. If a local government agency will be contacted but has not been to date, explain why and when such contact will take place.**

N/A

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620



ENVIRONMENTAL • ARCHITECTURE • ENGINEERING

1051 Winderley Place, Suite 201, Maitland, Florida 32751 - 407.660.7840 - www.trileaf.com

April 13, 2018

**City of Piedmont Public Works Department**

Attn: Mr. Pierce Macdonald-Powell, Senior Planner  
120 Vista Avenue  
Piedmont, CA 94611  
Phone: (510) 420-3063  
Email: pmacdonald@piedmont.ca.gov

RE: **Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**  
898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W

Dear Mr. Macdonald-Powell:

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (480) 850-0575 or email [k.grimwood@trileaf.com](mailto:k.grimwood@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Kimberly Grimwood  
Project Scientist

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 5. Public Involvement**

Attached, please find a copy of a legal notice regarding the proposed telecommunications tower construction that was posted in the *Piedmonter* on April 20, 2018. As of the date of this submission packet, no comments regarding this notice have been received by Trileaf Corporation. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

**Piedmonter**

510-262-2740

2003193

CALIF. NEWSPAPER SVC.  
BILLING DEPT.  
PO BOX 60460  
LOS ANGELES, CA 90060

**PROOF OF PUBLICATION**

**FILE NO. 3121931**

In the matter of

**Piedmonter**

I am a citizen of the United States. I am over the age of eighteen years and I am not a party to or interested in the above entitled matter. I am the Legal Advertising Clerk of the printer and publisher of the Piedmonter, a newspaper published in the English language in the City of Piedmont, County of Alameda, State of California.

I declare that the Piedmonter is a newspaper of general circulation as defined by the laws of the State of California, as determined by the order of the Superior Court of the County of Alameda, dated July 8, 1936, in the action entitled "In the Matter of the Petition of the Piedmonter to Have the Standing of the Piedmonter as a Newspaper of General Circulation Ascertained and Established," Case Number 140711. Said order provides that: "Petitioner's prayer for an order ascertaining and establishing The Piedmonter as a newspaper of general circulation...within the City of Oakland, County of Alameda, State of California, is granted." Said order has not been revoked.

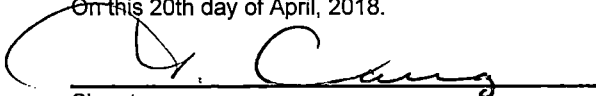
I declare that the notice, a printed copy of which is annexed hereto, has been published in each regular and entire issue of the Piedmonter and not in any supplement thereof on the following dates, to-wit:

**04/20/2018**

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Executed at Walnut Creek, California.

On this 20th day of April, 2018.



Signature

Legal No.

**0006139922**

Delta Oaks Group, PLLC proposes to build a 100-foot Slimline Communications Tower at the approx. vicinity of 898 Red Rock Road, Piedmont, Alameda County, CA 94611. Public comments regarding potential effects from this site on historic properties may be submitted within 30 days from the date of this publication to: Trileaf Corp, Kimberly Grimwood, k.grimwood@trileaf.com, 480-850-0575, or 2121 W. Chandler Blvd., Ste. 108, Chandler, AZ 85224.  
4/20/18  
CNS-3121931#  
THE PIEDMONTER  
PM 6139922  
Apr. 20, 2018



Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 6. Additional Consulting Parties**

**List additional consulting parties that were invited to participate by the Applicant, or independently requested to participate. Provide any relevant correspondence or other documents.**

N/A

**Native American Heritage Commission (NAHC) Involvement**

Trileaf Corporation requested a Sacred Lands File Search and a list of potentially interested Tribes on April 11, 2018 and received the information and list on April 24, 2018. Notifications to the Tribes were sent on May 8, 2018. The attached NAHC letter lists the Tribes identified. A second notice will be sent to all interested tribes/organizations, after a period of 14 days. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

STATE OF CALIFORNIAEdmund G. Brown, Jr., Governor**NATIVE AMERICAN HERITAGE COMMISSION**

Environmental and Cultural Department  
1550 Harbor Blvd., ROOM 100  
West SACRAMENTO, CA 95891  
(916) 373-3710  
Fax (916) 373-5471



April 17, 2018

Kimberly Grimwood  
Trileaf

Email to: [k.grimwood@trileaf.com](mailto:k.grimwood@trileaf.com)

RE: Piedmont Corp Yard, Alameda County

Dear Ms. Grimwood,

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not preclude the presence of cultural resources in any project area. Other sources for cultural resources should also be contacted for information regarding known and/or recorded sites.

Enclosed is a list of Native Americans tribes who may have knowledge of cultural resources in the project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at 916-573-1033 or [frank.lienert@nahc.ca.gov](mailto:frank.lienert@nahc.ca.gov).

Sincerely,

Frank Lienert  
Associate Governmental Program Analyst

Native American Contacts

4/17/2018

Coastanoan Rumsen Carmel Tribe

Tony Cerda, Chairperson  
244 E. 1st Street  
Pomona, CA 91766  
rumsen@aol.com

Ohlone/Costanoan

(909) 524-8041 Cell  
(909) 629-6081

Indian Canyon Mutsun Band of Costanoan

Ann Marie Savers, Chairperson  
P.O. Box 28  
Hollister, CA 95024  
ams@indiancanyon.org

Ohlone/Costanoan

(831) 637-4238

Amah Mutsun Tribal Band of Mission San Juan Bautista

Irene Zwieler, Chairperson  
789 Canada Road  
Woodside, CA 94062  
amahmutsuntribal@gmail.com

Ohlone/Costanoan

(650) 851-7489 Cell  
(650) 851-7747 Office  
(650) 332-1526 Fax

North Valley Yokuts Tribe

Katherine Erolinda Perez, Chairperson

P.O. Box 717  
Linden, CA 95236  
canutes@verizon.net

Ohlone/Costanoan  
Northern Valley Yokuts  
Bay Miwok

(209) 887-3415

Muwekma Ohlone Indian Tribe of the SF Bay Area

Rosemary Cambra, Chairperson

P.O. Box 360791  
Milpitas, CA 95036  
muwekma@muwekma.org

Ohlone / Costanoan

(408) 314-1898

(510) 581-5194

The Ohlone Indian Tribe

Andrew Galvan

P.O. Box 3152  
Fremont, CA 94539  
chochenyo@AOL.com

Ohlone/Costanoan  
Bay Miwok  
Plains Miwok  
Patwin

(510) 882-0527 Cell

(510) 687-9393 Fax

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed Piedmont Corp Yard, Alameda County

**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 [www.trileaf.com](http://www.trileaf.com)

May 8, 2018

**Amah Mutsun Tribal Band of Mission San Juan Bautista**

Ms. Irenne Zwierlein  
789 Canada Rd.  
Woodside, CA 94062

RE: **NAHC CONSULTATION**  
**Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project**  
**#639072**  
Alameda County, Oakland Quadrangle (USGS)  
Legal Description: *N/A*

Dear Ms. Zwierlein:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

The proposed project site is located at approximately 898 Red Rock Road, Piedmont, Alameda County, California 94611. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com). Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager



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May 8, 2018

**Coastanoan Rumsen Carmel Tribe**Mr. Tony Cerda  
244 E. 1st Street  
Pomona, CA 91766

RE: **NAHC CONSULTATION**  
**Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project**  
**#639072**  
Alameda County, Oakland Quadrangle (USGS)  
Legal Description: *N/A*

Dear Mr. Cerda:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

The proposed project site is located at approximately 898 Red Rock Road, Piedmont, Alameda County, California 94611. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com). Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 [www.trileaf.com](http://www.trileaf.com)

May 8, 2018

**Indian Canyon Mutsun Band of Costanoan**

Ms. Ann Marie Sayers

P.O. Box 28

Hollister, CA 95024

RE: **NAHC CONSULTATION****Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project  
#639072**

Alameda County, Oakland Quadrangle (USGS)

Legal Description: *N/A*

Dear Ms. Sayers:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

The proposed project site is located at approximately 898 Red Rock Road, Piedmont, Alameda County, California 94611. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com). Thank you for your assistance in this regard.

Sincerely,

Mindi Okai

Tribal Consultation Manager

**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 [www.trileaf.com](http://www.trileaf.com)

May 8, 2018

**Muwekma Ohlone Indian Tribe of the San Francisco Bay Area**

Ms. Rosemary Cambra  
P.O. Box 360791  
Milpitas, CA 95036

RE: **NAHC CONSULTATION**  
**Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project**  
**#639072**  
Alameda County, Oakland Quadrangle (USGS)  
Legal Description: *N/A*

Dear Ms. Cambra:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

The proposed project site is located at approximately 898 Red Rock Road, Piedmont, Alameda County, California 94611. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com). Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 [www.trileaf.com](http://www.trileaf.com)

May 8, 2018

**North Valley Yokuts Tribe**

Ms. Katherine Erolinda Perez

P.O. Box 717

Linden, CA 95236

RE: **NAHC CONSULTATION****Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project  
#639072**

Alameda County, Oakland Quadrangle (USGS)

Legal Description: *N/A*

Dear Ms. Perez:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

The proposed project site is located at approximately 898 Red Rock Road, Piedmont, Alameda County, California 94611. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com). Thank you for your assistance in this regard.

Sincerely,

Mindi Okai

Tribal Consultation Manager

**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 [www.trileaf.com](http://www.trileaf.com)

May 8, 2018

**The Ohlone Indian Tribe**Mr. Andrew Galvan  
P.O. Box 3152  
Fremont, CA 94539

RE: **NAHC CONSULTATION**  
**Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project**  
**#639072**  
Alameda County, Oakland Quadrangle (USGS)  
Legal Description: *N/A*

Dear Mr. Galvan:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

The proposed project site is located at approximately 898 Red Rock Road, Piedmont, Alameda County, California 94611. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com). Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 7. Area of Potential Effects**

You are required to provide two attachments regarding the Determination of Effect: Areas of Potential Effect and Mitigation of Effect (if applicable).

Areas of Potential Effect Guidelines:

**a. Describe the APE for direct effects and explain how this APE was determined.**

The project will include the tower and associated equipment, which will require a DE-APE of 864 square feet. As defined by the NPA, “the APE for direct effects is limited to the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the Undertaking.”

The Piedmont Corp Yard Project proposes to install a 100’ slimline pole by installing: (5) concentrate-filled traffic bollards, (1) stepped CMU block retaining wall, (4) 8’ wide double gates, one accessing each lease area, (1) 8’ high chain-link fence on top of CMU block retaining wall, and underground coax/fiber lines running in a common trench adjacent to the lease areas. These installations, made of up four smaller lease areas of 216 square feet each, will take place within the greater 48’ by 18’ (864-square foot) equipment lease area. The DE-APE for the proposed installation is a paved asphalt parking lot; the native ground surface is not visible. The DE-APE has been disturbed to depth by grading and paving of the area; and due to the previous disturbance, it is not considered sensitive for historic or prehistoric archaeological resources, and there is little potential to impact any unrecorded archaeological sites. There will be no visual impact to any historic properties, as the NRHP-eligible properties listed in the HRI are not within line of sight of the project location. Given these considerations, no further archaeological studies or monitoring are recommended.

**b. Describe the APE for visual effects and explain how this APE was determined.**

The APE for visual effects is the geographic area in which the Project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP). The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible. Due to the height of the proposed undertaking (100 feet), the presumed APE for visual effects for this project is a 0.5-mile radius from the tower site.

Applicant’s Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

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The Delta Oaks Group, PLLC. Piedmont Corp Yard Tower Project is located at 898 Red Rock Road, City of Piedmont, Alameda County, California (APN: 022-029-016). The current physical setting consists completely of a lightly developed industrial area. The location of the DE-APE (the physical location of the tower installation) consists of a concrete-paved parking lot of an industrial facility, surrounded by trees and grassy hills.

The project lies within the Piedmont city limit, which is located just east of the central portion of the Coast Ranges physiographic province. The Coast Ranges extend from the Oregon border south to Santa Barbara. The ranges rise abruptly from the Pacific Ocean to 6000 feet and descend into the Great Central Valley. The San Francisco Bay divides the ranges into northern and southern Coast Ranges. There are several rivers within the ranges; major rivers include the Eel River, the Salinas River, and the Russian River. These rivers tend to flow north and empty into the Pacific Ocean.

The coastal side of the Coast Ranges is characterized by a maritime climate with cold water from the ocean rising and turning into the frequent fogs. This fog drip is a significant contributor to the regions yearly precipitation and is responsible for the maintenance of the Coast Redwoods. The southern and eastern slopes are affected both by the rain-shadow effect and a Mediterranean climate pattern that often leave these portions of the ranges in drought. The Coast Ranges are home to a wide variety of biotic communities which include Coastal Terraces, Redwood Forest, Mixed Evergreen Forest, Foothill Woodland, Yellow Pine Forest, and Valley Grasslands in the northern ranges and Coastal Terraces, Coastal Sage Scrub, Chaparral, Foothill Woodlands, Yellow Pine Forest, and Valley Grasslands in the southern ranges (Schoenherr 1992).

The immediate project setting is a lightly developed rural industrial facility. No native ground surface was visible during the field investigation and no cultural resources were observed.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620


Approved by OMB  
 3060-1039

See instructions for  
 Public burden estimates

**Attachment 8. Historic Properties Visual Effects**

**Historic Properties Identified for Visual Effects Guidelines**

- a. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.I.a. of the Nationwide Agreement.

Primary Number	Historic Property Address	Resource Status	Effect Determination	Explanation of Effect Determination	Resource Photograph
P-01-010920	Piedmont Community Church, 400 Highland Avenue, Piedmont, California	3S- Appears Eligible	No Adverse Effect	No line-of-sight between the resource and the proposed project location	

- b. Provide the name and address (including U.S. Postal Service ZIP Code) of each Historic Property in the APE for visual effects, not listed in part “a”, identified through the comments of Indian Tribes, NHOs, local governments, or members of the public. Identify each individual or group whose comments led to the inclusion of a Historic Property in this attachment. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63).

N/A

- c. For any properties listed in the above Historic Properties list, that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.

N/A

Applicant’s Name: Delta Oaks Group, PLLC  
 Project Name: Piedmont Corp Yard  
 Project Number: 639072  
 FCC Form 620




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 3060-1039

See instructions for  
 Public burden estimates

**Attachment 9. Historic Properties Direct Effects**

**a. List all properties within the APE for direct effects.**

Primary Number	Historic Property Address	Resource Status	Effect Determination	Explanation of Effect Determination	Resource Photograph
P-01-011355	Mountain View Cemetery District, Eastern extent of Piedmont Avenue, Piedmont, California	3D- Appears Eligible	No Adverse Effect	Project area contains no elements that would contribute to the district; project location lacks integrity & setting; cemetery itself is not visible from project location	

**b. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for direct effects, not listed in part “a” (above), that the Applicant considers to be eligible for listing in the National Register as a result of the Applicant’s research. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63). For each property that was specifically considered and determined not to be eligible, describe why it does not satisfy the criteria of eligibility.**

N/A

Applicant’s Name: Delta Oaks Group, PLLC  
 Project Name: Piedmont Corp Yard  
 Project Number: 639072  
 FCC Form 620

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 9. Continued**

- c. **Describe the techniques and the methodology, including any field survey, used to identify Historic Properties within the APE for direct effects.<sup>1</sup> If no archeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.<sup>2</sup>**

NWB Environmental Services, LLC, conducted the archaeological field survey on April 23, 2018. The APE for direct effects was inspected via pedestrian survey. As part of this survey, the entire DE-APE was examined for the presence of cultural resources and historic properties. This included observing and noting the proposed locations of the tower and equipment lease areas. All of these project components are located in a paved parking lot. The current physical setting consists completely of a lightly developed industrial area. The location of the DE-APE consists of a concrete-paved parking lot of an industrial facility, surrounded by trees and grassy hills. No native ground surface was visible during the field investigation. The location is highly disturbed from modern development.

Given the level of disturbance within the graded and paved project area, the likelihood of uncovering subsurface cultural materials appears low. Based on field observations and available project information, the historic district located at/within the DE-APE, recorded as the Mountain View Cemetery Historic District (P-01-011355), will not suffer any adverse effects because the project location does not contain any elements identified as potential contributing features, objects, or structures in the site form. Additionally, the project location lacks both the integrity and setting necessary for inclusion in any proposed cemetery district. None of the features or structures of the cemetery are visible from the project location, which is a developed industrial facility.

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<sup>1</sup> Pursuant to Section VI.D.2.a. of the Nationwide Agreement, Applicants shall make a reasonable and good faith effort to identify above ground and archeological Historic Properties, including buildings, structures, and historic districts, that lie within the APE for direct effects. Such reasonable and good faith efforts may include a field survey where appropriate.

<sup>2</sup> Under Section VI.D.2.d. of the Nationwide Agreement, an archeological field survey is required even if none of these conditions applies, if an Indian tribe or NHO provides evidence that supports a high probability of the presence of intact archeological Historic Properties within the APE for direct effects.

Applicant's Name: Delta Oaks Group, PLLC

Project Name: Piedmont Corp Yard

Project Number: 639072

FCC Form 620

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3060-1039

See instructions for  
Public burden estimates

Based on the information gathered, no additional archaeological or historic resources are located within the DE-APE. No artifacts were recovered, nor any new archaeological resources within the APE for direct effects. Please refer to the Archaeological Resources Management Report (ARMR).

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 10. Effects on Identified Properties**

Mitigation of Effect Guidelines:

In the case of where an Adverse Visual Effect or Adverse Direct Effect has been determined you must provide the following:

- a. **Copies of any correspondence and summaries of any oral communication with the SHPO/THPO and any consulting parties.**

N/A

- b. **Describe any alternatives that have been considered that might avoid, minimize, or mitigate any adverse effects. Explain the Applicant's conclusion regarding the feasibility of each alternative.**

N/A

**For each property identified as a Historic Property in the online e-106 form:**

- a. **Indicate whether the Applicant believes the proposed undertaking would have a) no effect; b) no adverse effect; or, c) an adverse effect. Explain how each such assessment was made. Provide supporting documentation where necessary.**

Based on a review of the historic resources, one Historic Property has been previously recorded within the APE for direct effects. The Mountain View Cemetery District (P-01-011355), is located at the eastern extent of Piedmont Avenue, Piedmont, Alameda County, California. Although the project location is within the recorded boundaries of the potential district, the project location does not contain any elements identified as potential contributing features, objects, or structures on the site form. Additionally, the project location lacks both the integrity and setting necessary for inclusion in any proposed cemetery district. None of the features or structures of the cemetery are visible from the project location, which is a developed industrial facility. Therefore, the results of NWB's assessment indicate that no historic resources or Historic Properties will be adversely affected and the project may proceed without further archaeological review.

Applicant's Name: Delta Oaks Group, PLLC

Project Name: Piedmont Corp Yard

Project Number: 639072

FCC Form 620

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

Based on a review of the historic resources, one Historic Property has been previously recorded within 0.5 mile of the proposed cell tower area. One, The Piedmont Community Church (P-01-010920), is located at 400 Highland Avenue, Piedmont, Alameda County, California. No line of sight exists between this Historic Property and the proposed location of the tower, and therefore a recommendation of No Effect to Historical Properties within the Visual APE is recommended and the project may proceed without further archaeological review.

Please see the attached Archaeological Resource Management Report (ARMR).

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

## Cover Letter

### The Piedmont Corp Yard Tower Installation Project

NWB Environmental Services LLC  
3033 Fifth Ave. Ste. 210  
San Diego, California 92103

NWB Environmental Services, LLC (NWB) is under subcontract to Trileaf Corporation to provide a cultural assessment for the Delta Oaks Group, PLLC. Piedmont Corp Yard Tower Project (Piedmont Corp Yard project) located at 898 Red Rock Road, City of Piedmont, Alameda County, California (APN: 022-29-016). Delta Oaks Group, PLLC. proposes to install a 100' slimline pole by installing: (5) concentrate-filled traffic bollards, (1) stepped CMU block retaining wall, (4) 8' wide double gates, one accessing each lease area, (1) 8' high chain-link fence on top of CMU block retaining wall, and underground coax/fiber lines running in a common trench adjacent to the lease areas. These installations, made of up four smaller lease areas of 216 square feet each, will take place within the greater 48' by 18' (864-square foot) equipment lease area. This project includes two Areas of Potential Effect (APE). The Direct Effect Area of Potential Effects (DE-APE) is considered to be the location where ground-disturbing activities will occur, and the location of any supporting facilities or construction. The indirect APE, or visual APE, is considered to be extending out from the DE-APE to a limit of 0.5-mile in all directions. The project will include the tower and associated equipment, which will require a DE-APE of 864 square feet.

The Piedmont Corp Yard Project cultural resources study was conducted following the Federal Communications Commission (FCC) document FCC04-222 guidelines titled the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission, September 2004. Under these stipulations, this project has been conducted to conform with Section 106 of the National Historic Preservation Act of 1966, as amended ("NHPA") (codified at 16 U.S.C. §470f).

This project has been conducted as a Phase I investigation of potential adverse effects on archaeological resources and historic properties as a result of the proposed installation of the Piedmont Corp Yard tower. As a part of this investigation NWB Environmental Services, LLC (NWB), conducted a records search with the Northwest Information Center (NWIC), part of the California Historical Resources Information System (CHRIS). The records search was conducted by NWB Associate Archaeologist Paige Kohler, at the NWIC, on April 16, 2018. Trileaf will conduct correspondence with the Native American Heritage Commission (NAHC) and participate in local Public Notification procedures in efforts to thoroughly document and evaluate potential adverse effect to any archaeological and/or historical resources.

The NWIC records search for the Piedmont Corp Yard Project indicated that there is one known historic resource, recorded as the Mountain View Cemetery Historic District (P-01-011355), located at/within the DE-APE for this project. This district appears eligible for the National Register of Historic Places (NRHP) by survey evaluation and was given an NRHP status code of 3D (see Table 2).

The search of the California Historical Resources Information System (CHRIS) found a

total of three historic resources within the indirect APE, all with associated primary records. One (P-01-010920) is listed in the HRI and is assigned an NRHP code of 3S that categorizes it as appearing eligible as an individual property for the National Register by survey evaluation (see Table 3). The remaining two are listed in the HRI and have been assigned NRHP codes of 7R, or not evaluated for the National Register (P-01-003692), and 7W, or submitted to and then withdrawn from consideration (P-01-006731) (Table 4).

NWB has determined that no historic properties will suffer adverse effects from this undertaking and, therefore, there are no factors that have, or could potentially result in, an effect from the proposed undertaking.

Under the guidance set in place by the FCC, in conformance with Section 106 of the NHPA, there are no further actions recommended by NWB for the avoidance of adverse effects to cultural resources required for the Delta Oaks Group, PLLC. Trileaf Piedmont Corp Yard Tower Project.

The NWB contact for the Piedmont Corp Yard Tower Project is Michelle D. Noble, Senior Archaeologist, NWB Environmental Services, LLC (619) 546-5196.

[www.nwbenvironmental.com](http://www.nwbenvironmental.com)

3033 Fifth Ave. Ste. 210 • San Diego, California 92103 • Phone: 619.546.5196x102  
E-Mail: [pkohler@nwbenvironmental.com](mailto:pkohler@nwbenvironmental.com)

**Phase I Investigation for the Piedmont Corp Yard Tower Project, Piedmont,  
Alameda County, California.**

Prepared and Submitted by

Michelle D. Noble, M.A.

Reviewed by

Susan M. Hector, Ph.D., RPA

NWB Environmental Services, LLC  
3033 Fifth Ave. Ste. 210  
San Diego, California 92103

Prepared for, and submitted to

Kimberly Grimwood  
Trileaf Corporation  
2121 W. Chandler Blvd, Suite 203  
Chandler, AZ 85224

May 7, 2018

Oakland East California 7.5' United States Geological Services Quadrangle  
Map

This study included a 504-acre area.

NADB Keywords: Piedmont Corp Yard Tower Location, Oakland East,  
Oakland East USGS Quad Map, Alameda County, APN: 022-29-016



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## **MANAGEMENT SUMMARY/ABSTRACT**

NWB Environmental Services, LLC (NWB) is under subcontract to Trileaf Corporation to provide a cultural assessment for the Delta Oaks Group, PLLC. Piedmont Corp Yard Tower Installation Project (Piedmont Corp Yard Project) located at 898 Red Rock Road, City of Piedmont, Alameda County, California (APN: 022-29-016). Specifically, the project is located in Township 1 South, Range 3 West, Mount Diablo Baseline and Meridian, and is on the Oakland East United States Geological Survey (USGS) 7.5-minute topographic quadrangle map.

The Piedmont Corp Yard Project proposes to install a 100' slimline pole by installing: (5) concentrate-filled traffic bollards, (1) stepped CMU block retaining wall, (4) 8' wide double gates, one accessing each lease area, (1) 8' high chain-link fence on top of CMU block retaining wall, and underground coax/fiber lines running in a common trench adjacent to the lease areas. These installations, made of up four smaller lease areas of 216 square feet each, will take place within the greater 48' by 18' (864-square foot) equipment lease area. Under guidelines specified by the FCC, which conform to the standards set forth by Section 106 of the National Historic Preservation Act of 1966, as amended ("NHPA") (codified at 16 U.S.C. §470f), NWB conducted a cultural resources study of the potential for adverse effects to any known archaeological resources and historic properties within the area of direct impact, as well as within the half-mile records search area of the APE for the proposed Piedmont Corp Yard Project. An area of 504 acres was included as the APE for this study of the proposed Piedmont Corp Yard installation. The Direct Effect Area of Potential Effects (DE-APE) is considered to be the location where ground-disturbing activities will occur. The indirect APE, or visual APE, is considered to be extending out from the DE-APE to a limit of 0.5-mile in all directions. The preliminary records search was conducted by NWB Associate Archaeologist Paige Kohler with the Northwest Information Center (NWIC) on April 16, 2018. Trileaf will conduct correspondence with the Native American Heritage Commission (NAHC) and participate in local Public Notification procedures in efforts to thoroughly document and evaluate potential adverse effect to any archaeological and/or historical resources. NWB Archaeological Technician Mark Abelon conducted a field survey of the APE, under the direct supervision of Secretary of the Interior-qualified archaeologist, Michelle D. Noble. Ms. Noble subsequently evaluated the records search and drafted the following report following the Archaeological Resource Management Report (ARMR) guidelines.

The NWIC records search for the Piedmont Corp Yard Project indicated that there is one known historic resource, recorded as the Mountain View Cemetery Historic District (P-01-011355), located at/within the DE-APE for this project. This district appears eligible for the National Register of Historic Places (NRHP) by survey evaluation and was given an NRHP status code of 3D (see Table 2).

The search of the California Historical Resources Information System (CHRIS) found a total of three historic resources within the indirect APE, all with associated primary records. One (P-01-010920) is listed in the HRI and is assigned an NRHP code of 3S that categorizes it as appearing eligible as an individual property for the National Register by survey evaluation (see Table 3). The remaining two are listed in the HRI and have been assigned NRHP codes of 7R, or not evaluated for the National Register (P-01-003692), and 7W, or submitted to and then withdrawn from consideration (P-01-006731) (Table 4).

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NWB has determined that no significant archaeological resources or historic properties would suffer adverse effects due to the Piedmont Corp Yard Project, based on the results of the records search information and a field survey conducted by NWB.

The Piedmont Corp Yard Project cultural resources study was conducted following the FCC guidelines titled the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission, September 2004. Under these stipulations, this project has been conducted to conform with Section 106 of the NHPA. With the guidance set in place by the FCC, abiding by Section 106 of the NHPA, there are no further actions recommended by NWB for the avoidance of adverse effects to cultural resources required for the Piedmont Corp Yard Project.

## **INTRODUCTION**

The Piedmont Corp Yard Tower Project proposes to install a 100' slimline pole by installing: (5) concentrate-filled traffic bollards, (1) stepped CMU block retaining wall, (4) 8' wide double gates, one accessing each lease area, (1) 8' high chain-link fence on top of CMU block retaining wall, and underground coax/fiber lines running in a common trench adjacent to the lease areas. These installations, made of up four smaller lease areas of 216 square feet each, will take place within the greater 48' by 18' (864-square foot) equipment lease area. The above activities will take place at this site located at 898 Red Rock Road, City of Piedmont, Alameda County, California (APN: 022-29-016) (Figure 1). Under guidelines specified by the FCC, which conform to the standards set forth by Section 106 of the National Historic Preservation Act of 1966, as amended ("NHPA") (codified at 16 U.S.C. §470f), NWB conducted an evaluation of the potential for adverse effects to any known archaeological resources and historic properties within the Area of Potential Effect (APE) for the proposed Piedmont Corp Yard Project. This project includes two APEs; the Direct Effect Area of Potential Effects (DE-APE), considered to be the location where ground-disturbing activities will occur, and the indirect APE, or visual APE, considered to be extending out from the DE-APE to a limit of 0.5-mile in all directions. An area of 504 acres was included as the APE for this study of the proposed Piedmont Corp Yard Tower installation. NWB Associate Archaeologist Paige Kohler conducted the records search with the Northwest Information Center (NWIC), on April 16, 2018. Under the direct supervision of NWB Secretary of the Interior-qualified archaeologist Michelle D. Noble, NWB Archaeological Technician Mark Abelon performed a pedestrian survey of the APE on April 23, 2018. Ms. Noble subsequently evaluated the records search and drafted the following report adhering to the Archaeological Resource Management Report (ARMR) guidelines. Dr. Susan Hector reviewed the documents related to the project, and reviewed and revised the technical report. Trileaf Corporation will conduct correspondence with the NAHC, and participate in local Public Notification procedures.

## **BACKGROUND**

### **Natural Setting**

The project lies within the Piedmont city limit, which is located just east of the central portion of the Coast Ranges physiographic province. The Coast Ranges extend from the Oregon border south to Santa Barbara. The ranges rise abruptly from the Pacific Ocean to 6000 feet and descend into the Great Central Valley. The San Francisco Bay divides the ranges into northern and southern Coast Ranges. There are several rivers within the ranges; major rivers include the Eel River, the Salinas River, and the Russian River. These rivers tend to flow north and empty into the Pacific Ocean.

The coastal side of the Coast Ranges is characterized by a maritime climate with cold water from the ocean rising and turning into the frequent fogs. This fog drip is a significant contributor to the regions yearly precipitation and is responsible for the maintenance of the Coast Redwoods. The southern and eastern slopes are affected both by the rain-shadow effect and a Mediterranean climate pattern that often leave these portions of the ranges in drought. The Coast Ranges are home to a wide variety of biotic communities which include Coastal Terraces, Redwood Forest, Mixed Evergreen Forest, Foothill Woodland, Yellow Pine Forest, and Valley Grasslands in the northern ranges and Coastal Terraces, Coastal

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Sage Scrub, Chaparral, Foothill Woodlands, Yellow Pine Forest, and Valley Grasslands in the southern ranges (Schoenherr 1992).

The immediate project setting is a lightly developed rural industrial facility.

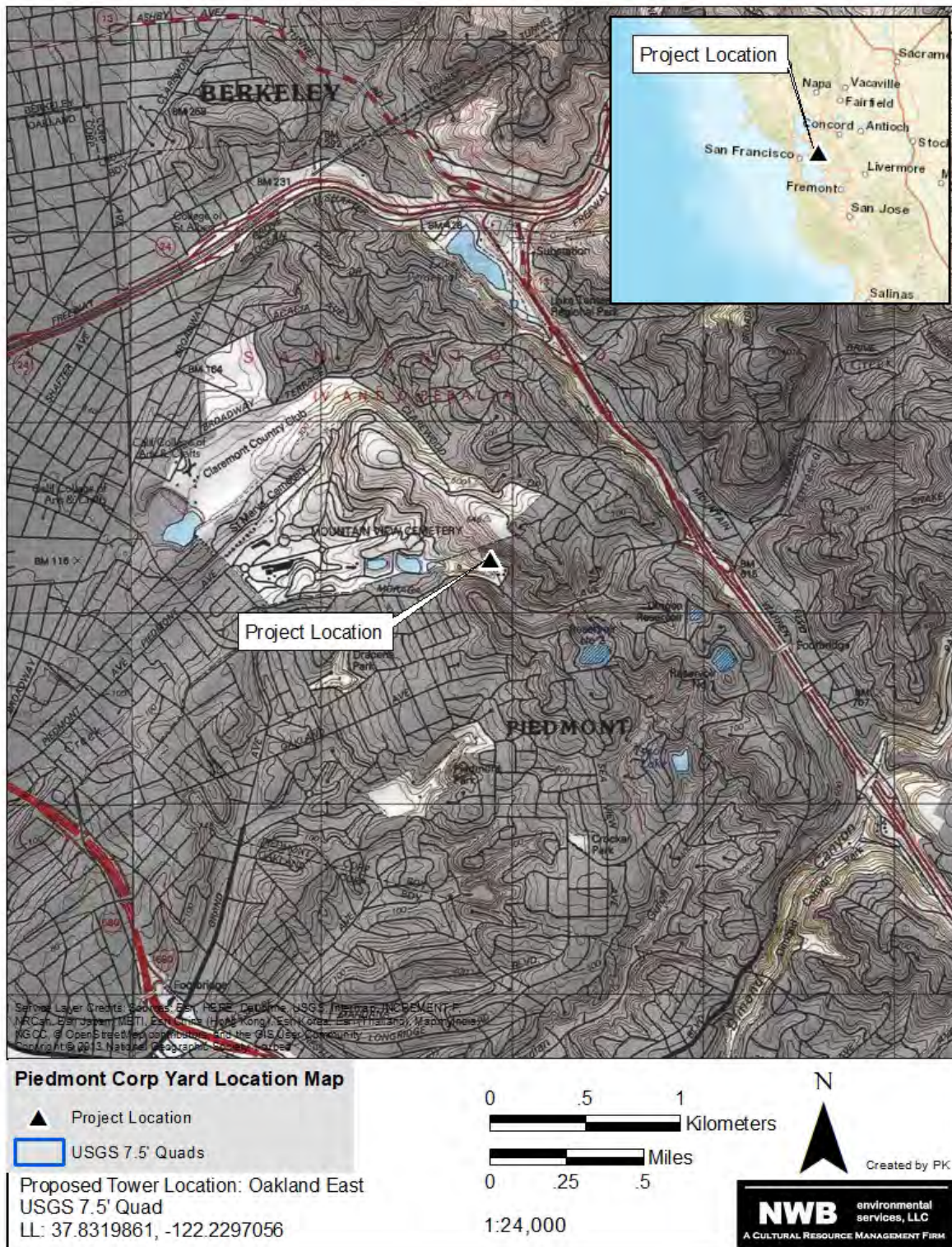


Figure 1. The Piedmont Corp Yard Tower Project Location Map



### Current Project Physical Setting

The Delta Oaks Group, PLLC. Piedmont Corp Yard Tower Project is located at 898 Red Rock Road, City of Piedmont, Alameda County, California (APN: 022-029-016). The current physical setting consists completely of a developed industrial area. The location of the DE-APE (the physical location of the tower installation) consists of a concrete-paved parking lot of an industrial facility, surrounded by trees and grassy hills. (Figures 2-7).



Figure 2. View to the south toward project location



Figure 3. View to the north from DE-APE



Figure 4. View to the east from DE-APE



Figure 5. View to the west from DE-APE



Figure 6. View to the south from DE-APE



Figure 7. View to the north toward project location

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## Cultural Setting

### Prehistoric Setting

Our understanding of the prehistoric occupation of the San Francisco Bay Area has been affected by the recent geologic history of the region. Archaeological evidence earlier than 8000 B.C. has not yet been discovered, potentially due to stream action, the formation of new alluvial deposits, or the deposits could be buried deeply under the continental shelf (Milliken et al. 2007). In addition, “microclimates and biotic communities along the edge of the Bay would have changed almost continuously during [the] early and middle Holocene” (Moratto 1984: 221).

The prehistoric occupation of the southernmost portions of the San Francisco Bay area is similar to that of the greater Central Coast region of California and can be divided chronologically into three distinct cultural periods (Moratto 1984) as briefly described below:

The **Millingstone Culture**, in this region, dates from approximately 8000 years ago to about 3500/3000 B.C. This period is characterized by large numbers of well-made handstones. The people of this time practiced broad-spectrum hunting and gathering, exploiting shellfish, fish, birds, and mammals, with shellfish understood to have been the dominant component of their diet. While Millingstone Culture sites have been documented as far as 25km away from the coast, most inland sites have had marine shell present, suggesting a maintained connection to the coast.

The **Hunting Culture**, dates from around 3500/3000 B.C. to 1000/1250 A.D. This period is characterized by large projectile points and large sites concentrated in valley oak savanna. A range of site types throughout the landscape have been identified; such as, middens, small sites containing flaked and ground stone artifacts, and lithic procurement or quarry sites. While coastal sites of this period reflect shellfish reliant diets, this resource decreased in importance in inland sites where vertebrates like deer and rabbit were most commonly found in midden deposits.

The **Late Period**, from 1250 A.D. to 1769 A.D. is easily distinguished from earlier periods by the appearance of new and abundant projectile points, bead-manufacturing drills, shell and stone beads, and bedrock mortars. The habitation sites during this period are overwhelmingly single component and inland; with almost complete abandonment of the coast. The increase in bedrock mortar sites and inland site locations suggests a shift to more labor-intensive nut crop exploitation that would support larger populations than marine resource based economies.

### Ethnographic Setting

The candidate area, Alameda County, lies within the region occupied at the time of historic contact by the Costanoans. At the time of Spanish contact in 1769, the Costanoans resided in the area extending from San Benito County in the south to Alameda County in the north. Though drawing definitive boundaries for their territory is difficult, it generally is thought to have included San Benito, Santa Cruz, Santa Clara, San Mateo, San Francisco, and Alameda Counties (Levy 1978; Kroeber 1925).

According to archaeological data, the Costanoan people, specifically the Rumsen and

Awaswas groups, chose to establish permanent villages away from the ocean shore on higher ground. (Levy 1978).

Common styles of structures in villages generally resembled domed, circular structures, thatched with tule, grass, wild alfalfa, fern, or carrizo. Sweathouses, or small semi-circular earth-covered buildings used for pleasure and as a clubhouse or meeting place for adult males, were another common structure, usually located along a stream bank near the villages. The last types of structures often found in Costanoan villages were assembly houses or dance plazas, which were circular or oval in shape and consisted of a woven fence of brush or laurel branches about four and one-half feet high. A single doorway and small opening was constructed opposite it. These types of structures tended to be located in the center of the village, with dwellings around their periphery (Levy 1978).

The Costanoan subsistence strategy of those along the coast, which would encompass our Alameda County communities, focused on coastal and adjacent inland resources, which included waterfowl, fish, deer, elk, antelope, bear, mountain lion, sea lion, as well as smaller animals such as rabbits and mice. Plant-food resources were also utilized, such as acorns and other nuts, berries, and roots.

Rich cultural traditions were typical of the Costanoan people. The best-known items of cultural significance are those made of cinnabar. This material was known over much of northern California, and parties from as far away as the Columbia River traveled to Costanoan territory to obtain it. Cinnabar itself was used by the Costanoan people to make red pigment for body paint. Other cultural traditions common to the Costanoan were tattooing and body piercing, as well as the weaving of baskets using the stems of plants such as rushes, willow, and tule, as well as shell and feathers. (Levy 1978).

The basic unit of political organization for the Costanoans was the tribelet. A tribelet was made up of one or more villages and had a number of camps within a tribelet territory. The boundaries of each tribelet's territory were defined by physiographic features. Chiefs of tribelets could be either men or women, but the office was usually passed patrilineally, unless no son existed, and then it was passed to the chief's sister or daughter. (Levy 1978).

## **Historic Setting**

### **Alameda County Area**

The history of the San Francisco Bay region, including the Alameda County coastline, can be divided into the Spanish Period (1769-1821), the Mexican period (1822-1848), and the American Period (1848-Present). The first foreign group to arrive in the San Francisco Peninsula were the Spanish. An expedition led by Gaspar de Portolá and Father Juan Crespí traveled from San Diego up the coast and arrived in what is now San Mateo County in 1769. During the Spanish Period, 21 missions were established along the California coast. Mission San Francisco de Asís (also known as Mission San Francisco Dolores) was established in 1776 north of the project area, Mission Santa Clara de Asís in 1777 to the east, and Mission Santa Cruz to the south in 1791. The current city of Piedmont fell under the jurisdiction of Mission Santa Cruz beginning in 1797.

Mexico gained independence from Spain in 1821, and gained control of Spanish colonial outposts. During this time, mission lands were granted to private individuals to be used for

ranching. Alameda County was largely occupied by ranchos granted in the San Antonio Grant of 1810 and the Valle de San Jose Grant of 1839 (ESA 2004).

Following the culmination of the Mexican-American War with the Treaty of Guadalupe Hidalgo in 1848, California officially became a state in 1850. With the discovery of gold in the Sierra Nevada also in 1848, Northern California experienced a major population increase. Alameda County was created in 1853, and increased settlement and the division of many of the large ranchos led to a change from a ranching economy to one focused on agriculture (Stanger 1963).

Due to its topography and location so proximal to the urban center of Oakland, the city of Piedmont remains a small, urban community dominated by agriculture and rural land-use. The 2010 United States Census reported a population of 643, and the town experiences regular tourism traffic concentrated during the weekends in summer months.

### **City of Piedmont**

The City of Piedmont has roots dating back to 1820, when Don Luis Peralta owned 14,330 acres of land located on the eastern side of San Francisco Bay. The modern-day areas of Piedmont, Berkeley, and Oakland all fell within his vast Rancho San Antonio holdings. Eventually, this rancho passed from Peralta's hands into majority ownership by Jose Domingo, and one section became the City of Berkeley later on, while most of the Vincente family's land became the City of Oakland. Modern-day Piedmont is made up a small section of both of these holdings.

A man named Walter Blair moved to the area in 1852, buying 600 acres from the Peraltas and building extensively across it. Then, in 1877, 350 acres of this land was sold to James Gamble, the President of Western Union Telegraph. His plan, after building himself a large house on it, was to sell the rest of the land using his new business called the "Piedmont Land Company." The meaning of Piedmont in Italian is "foot of the mountain," which Gamble saw as a good name for the new community.

In the 1880s there were only seven homes standing in what is now the City of Piedmont. Highland Avenue was named after the area called "The Highlands" which was property owned by Isaac and Sarah Requa. Another home, at the corner of Vista and Bonita Avenues, looks the same today as it did one hundred years ago and belonged to Jesse Wetmore.

Also during the 1880's, the first factory, a silk factory, was constructed in Piedmont. At the top of Oakland Avenue was a mulberry orchard boasting over 6,000 trees, as well as a two-story building known as the Ladies Silk Culture Society. During the height of its productivity, the factory had over one hundred women spinning thread from cocoons of silk worms that grew on the mulberry trees. Soon, however, the silk worms began to run out of mulberry trees to feed them, and the Ladies Silk Culture Society closed its doors in 1895.

The population of Piedmont multiplied by ten in just one year when the massive earthquake occurred in San Francisco on April 18, 1906, causing thousands to flee across the bay to safer areas.

On January 7, 1907, the State of California registered papers from Hugh Craig and James Ballentine for the incorporation of a new city measuring just 1.8 square miles, which they named Piedmont. Because the map being used for the boundaries of the town came from the Piedmont Sanitary Sewer District, and the sewer lines were already underneath houses, many homes that exist today are positioned on the boundary between the Piedmont and the City of Oakland.

In late January of 1907, elections were held to determine if Piedmont should become a city. Initially, 118 men who owned land in Piedmont voted to become a city, but some people were dissatisfied with this vote and rallied for another election, which was held in September of the same year. One-hundred and fifty-five men voted at that time, causing Piedmont to become a city with just ten votes being the deciding difference.

The first mayor of Piedmont, Varney Gaskill, only stayed in the position for three months. Hugh Craig became the second mayor of Piedmont in May of 1907 and is still considered to be the father of Piedmont.

Piedmont City Hall was constructed in 1908, and was designed by Albert Farr, a famed architect. Farr was also responsible for designing many civic center buildings, including the Piedmont Community Church and the Exedra arch.

Property located on Bonita Avenue donated by Frank C. Havens was transformed into the city's first school in 1911. In 1913, the Egbert Beach School was established and, in 1921, a section of Piedmont Park was used to construct the city's first high school.

Piedmont was known as the "City of Millionaires" during the Roaring Twenties because there were more millionaires per square mile than in any other city in the country.

On December 18, 1922, Piedmont became a charter city as defined under the laws of the State of California. The adoption of the charter by voters occurred on February 27, 1923, and can only be changed by another round of voting.

An initiative was put forth during the 1980's and 1990's focusing on restoring Piedmont's existing parks. In addition to park restoration, three new parks were also created; Linda Park, Dracena Park, and Coaches Playfield. More than \$350,000 was spent cleaning up Piedmont Park and building a new overlook behind the Community Hall. A gift for Crocker Park was received by the City of Piedmont as well, which was a large statue of a bear and her cubs, designed by Benny Bufano. The most recent park project is the Hampton Field Building, designed for use as a pre-school and for recreational purposes for Piedmont children.

The 1990's also saw major building projects related to the Piedmont Unified School District. One of these projects involved rebuilding Witter Field at Piedmont High School.

In modern times, Piedmont still has many names that hearken back to past notable figures in its history. For instance, Havens School is named after the man who rebuilt Piedmont Park, Blair Avenue is named after the farmer/businessman who first settled here, and Craig Avenue's name comes from the man who pushed for Piedmont to become a city. The street names of Highland Avenue and Requa Road also refer to one of the first seven families to settle in Piedmont (Mihm 2007).

## METHODS

### Research

A records search was conducted at the NWIC located at Sonoma State University. It included a review of all recorded historic and prehistoric archaeological sites, as well as a review of known cultural resources reports within a 0.5-mile radius of the proposed tower location. In addition, NWB examined the National Register, California Register of Historic Resources (CRHR), California Historical Landmarks (CHL), California Points of Historical Interest (CPHI), and the Historic Resources Inventory (HRI). The Historic Properties Directory was inspected for the address of the location of the proposed Piedmont Corp Yard Tower Project.

### Field Survey

After NWB Associate Archaeologist Paige Kohler reviewed available records held at the NWIC, NWB Archaeological Technician Mark Abelon completed an intensive field survey of the Subject Property on April 23, 2018 under the direct supervision of Secretary of the Interior-qualified archaeologist, Michelle D. Noble. The field survey took into account potential impacts to properties within the APE for direct and visual effects. The location is highly disturbed from modern development.

## RESULTS

The NWIC records search indicated that there have been a total of seven cultural resource reports completed within the 0.5-mile APE (Table 1).

**Table 1. NWIC Reports within the Piedmont Corp Yard Project 0.5-mile APE**

NWIC ID	Author	Date	Title
S-021370	S. Psota (Anthropological Studies Center, Sonoma State University)	1999	Review of the Historic Resources for Site PL-099-01, Telephone Mount Near 5636 Moraga Avenue, Piedmont, Alameda County, California (50001 19/99) (letter report)
S-022815	D. Chavez and J. Hupman (David Chavez & Associates)	2000	Archaeological Resources Investigations for The City of Piedmont, East Bay Infiltration/ Inflow Correction Program, Piedmont, California
S-032289	C. Losee (Archaeological	2006	Records Search Results and Site Visit for Cingular Wireless Project #12957: 120 Vista



	Resources Technology)		Avenue, Piedmont, CA (letter report)
S-035230	L. Billat and D. Supernowicz (Earth Touch, Inc.)	2008	Collocation ("CO") Submission Packet, FCC Form 621, Piedmont Community Church Highland, BA-12792
S-038243	L. Billat (Earth Touch, Inc.; Historic Resource Associates)	2011	Collocation Submission Packet, DT Piedmont, CNU3977, 120 Vista Avenue, Piedmont, Alameda County, CA 94611
S-038243a	Historic Resource Associates	2011	Cultural Resources Study of the DT Piedmont Project, AT&T Site No. CNU3977, 120 Vista Avenue, Piedmont, Alameda County, California 94611
S-046751	T. Bulger, T. Young, and N. Fino (Willam Self Associates, Inc.)	2014	Cultural Resources Assessment Report, Mountain View Cemetery Burial Expansion Project, Oakland, Alameda County, California

The NWIC records search for the Piedmont Corp Yard Project indicated that there is one known historic resource, the Mountain View Cemetery Historic District (P-01-011355) located at/within the DE-APE for this project. This site appears eligible for the National Register of Historic Places (NRHP) by survey evaluation and was given an NRHP status code of 3D (see Table 2).

The search of the California Historical Resources Information System (CHRIS) found a total of three historic resources within the indirect APE, all with associated primary records. One (P-01-010920) is listed in the HRI and is assigned an NRHP code of 3S that categorizes it as appearing eligible as an individual property for the National Register by survey evaluation (see Table 3). The remaining two are listed in the HRI and have been assigned NRHP codes of 7R, or not evaluated for the National Register (P-01-003692), and 7W, or submitted to and then withdrawn from consideration (P-01-006731) (Table 4).

There are no CHLs, and no CPHIs within the 0.5-mile Piedmont Corp Yard APE.

**Resources Located Within the Direct APE**

**Table 2. Resources Appearing Eligible by Survey Evaluation, Not Listed in the HRI, With Primary Numbers, in Direct APE**

Primary Number	Address	Name	Year Constructed	NRHP Status Code	Distance from DE-APE
P-01-011355	Eastern extent of Piedmont Avenue, Piedmont, California	Mountain View Cemetery District	1863	3D	0 mile (within DE-APE)



Figure 8. View to the northeast of Mountain View Cemetery Historic District (not visible from the project area).

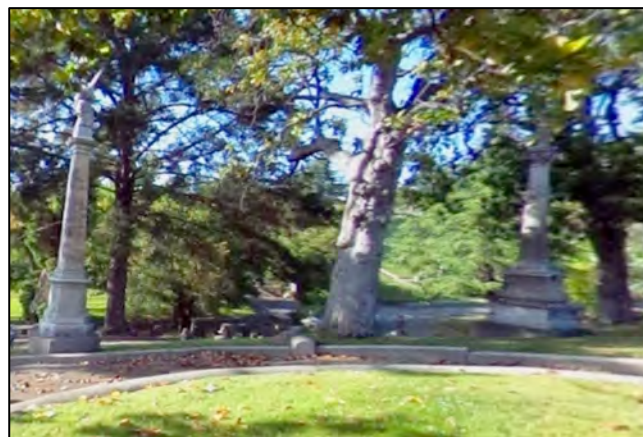


Figure 9. View to the east from the eastern extent of the Mountain View Cemetery Historic District toward proposed tower location (not visible from the project area)

**Table 3. Resources Appearing Eligible by Survey Evaluation, Listed in the HRI, With Primary Numbers, in Indirect APE**

Primary Number	Address	Name/Description	Year Constructed	NRHP Status Code	Distance from DE-APE
P-01-010920	400 Highland Avenue, Piedmont, California	Piedmont Community Church	1917	3S	0.47 mile S/SW



Figure 10. View to the west of Piedmont Community Church Historic Property (not visible from the project area)

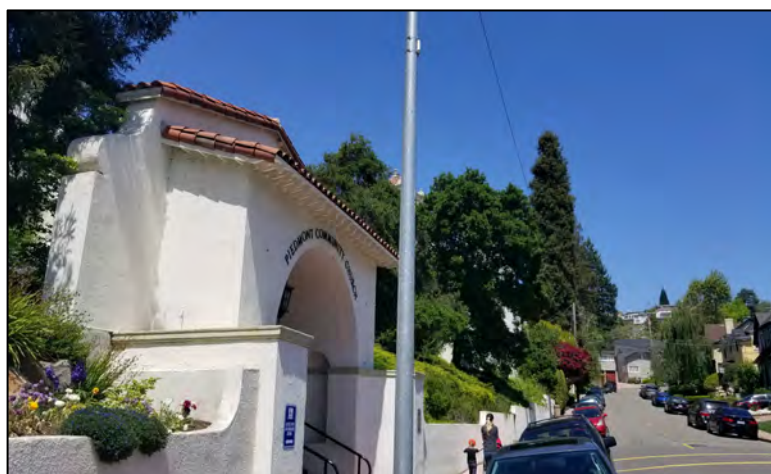


Figure 11. View to the north from Piedmont Community Church Historic Property toward project location (not visible from the project area)

**Table 4. Resources Not Yet Evaluated for NRHP Eligibility, Listed in the HRI, With Primary Numbers, in Indirect APE**

Primary Number	Address	Name	Year Constructed	NRHP Status Code	Distance from DE-APE
P-01-003692	320 Scenic Avenue, Oakland, California	Martinez House and Studio (Single-Family Residence)	1908	7R	0.20 mile S
P-01-006731	1900 Oakland Avenue, Piedmont, California	None (Single-Family Residence)	1894	7W	0.43 mile SW

**Field Survey Results**

As part of the pedestrian survey, the entire DE-APE was examined for the presence of cultural resources and historic properties. This included observing and noting the proposed locations of the tower and equipment lease areas. All of these project components are located in a paved parking lot. No native ground surface was visible during the field investigation.

Given the level of disturbance within the graded and paved project area, the likelihood of uncovering subsurface cultural materials appears low. Based on field observations and available project information, the historic district located at/within the DE-APE, recorded as the Mountain View Cemetery Historic District (P-01-011355), will not suffer any adverse effects because the project location does not contain any elements identified as potential contributing features, objects, or structures on the site form. Additionally, the project location lacks both the integrity and setting necessary for inclusion in any proposed cemetery district. None of the features or structures of the cemetery are visible from the project location, which is a developed industrial facility.

## MANAGEMENT CONSIDERATIONS

In accordance with the guidance set in place by the FCC, conforming with Section 106 of the NHPA, NWB has assessed the potential for adverse effects of the Piedmont Corp Yard Tower Installation Project on any archaeological sites and historic properties.

The NWIC records search for the Piedmont Corp Yard Project indicated that there is one known historic resource, the Mountain View Cemetery Historic District (P-01-011355) located at/within the DE-APE for this project. This site appears eligible for the National Register of Historic Places (NRHP) by survey evaluation through an NRHP status code of 3D (see Table 2).

The search of the California Historical Resources Information System (CHRIS) found a total of three historic resources within the indirect APE, all with associated primary records. One (P-01-010920) is listed in the HRI and is assigned an NRHP code of 3S that categorizes it as appearing eligible as an individual property for the National Register by survey evaluation (see Table 3). The remaining two are listed in the HRI and have been assigned NRHP codes of 7R, or not evaluated for the National Register (P-01-003692), and 7W, or submitted to and then withdrawn from consideration (P-01-006731) (Table 4).

Although the project location is within the recorded boundaries of the potential Mountain View Cemetery Historic District, the site has not been determined eligible for listing in the National Register, nor does the project location contain any elements identified as potential contributing features, objects, or structures on the site form. Additionally, the project location lacks both the integrity and setting necessary for inclusion in any proposed cemetery district. None of the features or structures of the cemetery are visible from the project location, which is a developed industrial facility. Therefore, the results of NWB's assessment indicate that no historic resources or Historic Properties will be adversely affected by the installation of the Delta Oaks Group, PLLC. Piedmont Corp Tower Project.

The DE-APE for the proposed installation is a paved asphalt parking lot; the native ground surface is not visible. The DE-APE has been disturbed to depth by grading and paving of the area; and due to the previous disturbance, it is not considered sensitive for historic or prehistoric archaeological resources, and there is little potential to impact any unrecorded archaeological sites. There will be no visual impact to any historic properties, as the NRHP-eligible properties listed in the HRI are not within line of sight of the project location. Given these considerations, no further archaeological studies or monitoring are recommended.

If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the descendant may inspect the site of the discovery. The descendant shall complete the inspection within 48 hours of being granted access to the site. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. If cultural materials are discovered during any excavation, a qualified archaeologist should be notified to assess the significance of such materials.

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**Appendix A:**

**Project Personnel Resumes**

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**Susan M. Hector, Ph.D., RPA**  
**Principal Investigator, NWB Environmental Services**  
**Anthropologist**

**Total Years of Experience:** 40

**Employment History:**

2014- Principal Investigator, NWB Environmental Services  
2013-2014 Instructor, Anthropology Department, San Diego City College  
2012-2013 Manager, Environmental Programs, SDG&E  
2009-2012 Principal Environmental Specialist, Cultural Resources, SDG&E and SCG  
2005-2008 Principal/Senior Archaeologist, ASM Affiliates, Inc., Carlsbad, California  
2001-2005 Principal, Susan Hector Consulting, San Diego, California  
1999-2001 Director, County of San Diego Department of Parks and Recreation, San Diego, California  
1996-1999 Chief, County of San Diego Department of Parks and Recreation, San Diego, California  
1992-1996 Senior Project Manager, County of San Diego Department of Parks and Recreation, San Diego, California  
1989-1992 Project Manager, County of San Diego Department of Parks and Recreation, San Diego, California  
1980-1989 Director of Cultural Resources, RECON, San Diego, California  
1977-1980 Senior Museum Preparator, UCLA Museum of Cultural History (now the Fowler Museum), Los Angeles, California  
1974-1980 Research Collaborator, UCLA Institute of Archaeology, Los Angeles, California  
1973-1974 Archaeological Field Assistant, UCLA Archaeological Survey, Los Angeles, CA

**Education:**

Ph.D. 1984/Anthropology/University of California, Los Angeles  
M.A. 1978/Anthropology/University of California, Los Angeles  
B.A. 1975/Anthropology/University of California, Los Angeles (cum laude)

**Additional Training:**

2011 Fiber Preparation and Processing Workshop. Celia Quinn  
2010-2011 Spinning. Margaret Tyler, Grossmont Adult School  
2008 Section 106 Essentials. Advisory Council on Historic Preservation  
2006 Section 106: How to Negotiate and Write Agreements, National Preservation



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	Institute
2005	Kumeyaay Ethnobotany. Kumeyaay Community College, Sycuan Reservation
2005	Gourd Rattle Making and Usage. Agua Caliente Culture Museum
2004	Traditional Southern California Basketweaving Workshop. California Indian Basketweavers Association
2002	Identification and Management of Traditional Cultural Places, National Preservation Institute
2002	Section 106: A Review for Experienced Practitioners, National Preservation Institute

**Registrations:**

Register of Professional Archaeologists (RPA)  
Orange County  
County of Los Angeles  
County of San Diego  
City of San Diego  
Bureau of Land Management, Permit for Archaeological Investigations, SDG&E/SCG areas

**Professional Memberships:**

2008-	State Historic Resources Commission, Archaeology Subcommittee
2004-2006	Governor's Appointee/Governing Board, San Diego River Conservancy
2002-2005	Board of Directors/San Diego Archaeology Center
2002-2005	Board of Directors/Planning and Research Collaborative
2001-2005	Board of Directors/Save Our Heritage Organisation (SOHO)
2001-2003	Communications Committee Chairman/Altrusa International Service Club
2001-2005	Advisory Board/Volcan Mountain Preserve Foundation
2000-2004	Editorial Board/Archaeological Conservancy
1999-2004	Board of Directors/Presidio Park Council
1998-2000	ad hoc Member/City of Oceanside Historical Site Board
1987-1995	Member/City of San Diego Historical Site Board
1987-1989	Founder/Society for California Archaeology (SCA) Proceedings
1989-1995	Editor-in-chief/Society for California Archaeology (SCA) Proceedings
1995	Board of Advisors/Society for Amateur Scientists
1987-present	Member/Sigma Xi
1987-1991	Coordinator/South Coastal Information Center, San Diego State University
1987-1988	President/Society for California Archaeology (SCA)
1986-1987	Southern Vice President/Society for California Archaeology (SCA)

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**Awards/Commendations:**

2014	Lifetime Achievement Award, Society for California Archaeology
2012	Outstanding Achievement Award, Environmental Services, SDG&E
2012	Nomination for Governor's Award (Sempra Cultural Resources Screening Tool)
2011	Governor's Award (co-authoring SB 1034, Cal-ARPA)
2011	ACRA Award in the Private Sector (Sempra Cultural Resources Screening Tool)
2011	Special Recognition Award, Society for California Archaeology (SB 1034 – CalARPA)
2009	Presidential Commendation, Society for California Archaeology (SCA Proceedings founding and editorship)
2007	Outstanding Environmental Resource Document, Association of Environmental Professionals (SDG&E Cultural Resources Training Video)
2003	Award of Excellence for Historic Preservation, City of San Diego Historical Resources Board (San Dieguito River Valley Archaeology Project)
2002	San Diego County Department of Parks and Recreation, Departmental Recognition as Director
2000	California Preservation Foundation (CPF) Preservation Design Award (restoration of the Spring House at Los Peñasquitos Ranch House National Register District)
2000	People in Preservation (PIP) Award from Save Our Heritage Organisation (SOHO) for the restoration of the Spring House, Los Penasquitos
2000	Certificate of Appreciation from Assembly Member Susan Davis (restoration of the Spring House, Los Penasquitos)
1998	Governor's Award (restoration of Vallecito Stage Station)
1997	Governor's Award (restoration of Rancho Guajome Adobe)
1997	California Preservation Foundation (CPF) Preservation Design Award (restoration of Rancho Guajome Adobe)
1996	Orchid Award from the AIA (restoration of Rancho Guajome Adobe)
1996	Orchid Award from the AIA (restoration of Vallecito Stage Station)
1994	Park Project Manager of the Year, County of San Diego
1994	Outstanding Achievement, County of San Diego, for Los Peñasquitos Ranch House restoration and research (with Mary Ward)
1992	Park Project Manager of the Year, County of San Diego
1991	Park Project Manager of the Year, County of San Diego

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**Clearances:**

MCB Camp Pendleton

MCAS Miramar

Edwards AFB

Naval Base San Diego

**Professional Profile:**

Dr. Susan Hector has 40 years of experience with prehistoric, historic, and ethnographic cultural resources in southern California. In addition, she has substantial management experience beyond the cultural resources subject area. She served as the Director for San Diego County Department of Parks and Recreation, and the Environmental Programs Manager for San Diego Gas & Electric Company. Dr. Hector has taught classes in anthropology and archaeology at San Diego City College. She is currently the Principal Investigator for NWB Environmental Services, managing cultural resources projects for the company.

Dr. Hector has prepared more than 250 compliance technical reports for federal, state, and local agencies. She has authored many scientific articles and publications, and made technical and popular presentations on prehistoric and historic archaeology and has professional experience with the cultural resources of the Great Basin, American Southwest, and California. She has special expertise in the development of management plans for cultural resources located within undeveloped areas such as utility corridors, open space preserves, or parks. Dr. Hector worked for the County of San Diego Department of Parks and Recreation for 12 years, ending as the Director of the department. While working for the County of San Diego, Dr. Hector successfully obtained grants for historic preservation and natural resource conservation. She was directly responsible for the development of a cultural resources management program for the County. From 2009 – 2012, she was a Principal Environmental Specialist, Cultural Resources, and provided services for both San Diego Gas and Electric and Southern California Gas Company, where she developed their first cultural resource management program. A significant part of this program is its GIS capabilities to screen projects for impacts to archaeological sites. She developed the Arc Avoid GIS tool that is used to manage operations and maintenance work within the SDG&E service area, and the company received an ACRA award in 2011 for her work.

Dr. Hector has directed and completed archaeological and historical research projects, field surveys and inventories, test programs, and data recovery projects throughout the west. She has special expertise in ethnobotany, shellfish analysis, lithic tool analysis, historic artifacts, ethnography and ethnohistory, and hunter-gatherer special activity areas. Her diverse background also includes museum curation and project management. She has also taught classes in anthropology and archaeology at the college level in Los Angeles and San Diego.

Dr. Hector successfully completed five National Register nominations (resulting in listing in the National Register of Historic Places), and a sixth will be submitted in 2014. Four of the six include traditional cultural landscapes, and were prepared in collaboration with local Native American tribes.

---

**Michelle D. Noble, M.A.**  
**NWB Senior Archaeologist**

**Total Years of Experience:** 15

**Employment History:**

2017- Senior Archaeologist, NWB Environmental Services, LLC  
2013- Archaeologist & Museum Property Specialist, US Bureau of Reclamation,  
Department of the Interior, Mid-Pacific Region, Sacramento, California  
2009 Field Technician, Post Buckley Schuh and Jernigan (Atkens), Sacramento,  
CA  
2003-2013 Staff Archaeologist, Collections Manager, Field Director, Archaeological  
Research Center, California State University, CA

**Education:**

M.A. 2011/Anthropology/ California State University, Sacramento  
B.A. 2003/English Literature/ California State University, Fresno  
2003/Anthropology/ California State University, Fresno  
(*Summa Cum Laude*)

**Additional Training:**

2017 Section 106 Consultations from the Department of the Interior  
2017 Working in Indian Country, from the Bureau of Reclamation  
2016 NAGPRA Training for Archaeologists from the National Center for Preservation  
Technology and Training and the National Park Service  
2016 GIS Training from Esri, Sacramento, CA  
2015 Museum Property Management from the Department of the Interior  
2015 GIS training from Esri, Sacramento, CA  
2015 Section 106 of the National Historic Preservation Act from the National Preservation  
Institute  
2014 NEPA Training, Bureau of Reclamation  
2003 Archaeology Field School, California State University, Fresno, CA  
2002 Archaeology Field School, California State University, Fresno, CA

**Professional Memberships:**

Society of American Archaeology  
Society for California Archaeology  
Great Basin Anthropological Association

**Professional Profile:**

Ms. Noble is an archaeologist who has 15 years of experience with prehistoric and historic cultural resources in California and Nevada. She has directed and completed archaeological and historical research projects, field surveys and inventories, test programs, and data recovery projects throughout California and Nevada. Locations of work include, the Central Coast, northern redwood country, along the Trinity River, Sacramento and the Delta, the Sierra Nevada foothills and mountains, the Central Valley, the Owens Valley and the whole of the Inyo/Mono region, Napa Valley, and Lahontan Basin.

She has directed graduate students and run laboratory work. She has special expertise in paleobotanical analysis, ground and battered stone analysis, artifact photography, and database creation and maintenance. Additionally, she has been trained and experienced in museum property management and NAGPRA compliance and consultations.

She has written numerous academic reports and compliance reports. She has written articles and presented at conferences and for the public. She has led field schools and taught classes to both fellow archaeologists at all levels, as well as members of the public.

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 11. Site Information – Photographs**

You are required to provide photographs and maps as part of this filing. Additional site information can be provided in an optional attachment.

**Photograph Requirements:**

Except in cases where no Historic Properties were identified within the Areas of Potential Effects, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map or text, and dated; the focal length of the lens and the height of the camera should be noted. The source of any photograph included but not taken by the Applicant or its consultant (including copies of historic images) should be identified on the photograph.

- a. Photographs taken from the site should show views from the proposed location in all directions. The direction (e.g., north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed site.**

Please see attached Photographs and the Archaeological Resources Management Report with photographs, which were taken by NWB Environmental Services, LLC on April 23, 2018, unless otherwise noted.

- a. Photographs of all listed in and eligible properties within the Areas of Potential Effects.**

N/A

- b. If any listed or eligible properties are visible from the proposed site, photographs looking at the site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included. If any listed or eligible properties are within the APE, photos looking at each historic property should be included.**

N/A

Aerial photographs were obtained using Google Earth and are dated August, 2017.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

### Piedmont Corp Yard Site Photos



1. View away from proposed tower location, South.



2. View away from proposed tower location, Southwest.



3. View away from proposed tower location, West.



4. View away from proposed tower location, Northwest.



5. View away from proposed tower location, North.



6. View away from proposed tower location, Northeast.



7. View away from proposed tower location, East.



8. View away from proposed tower location, Southeast.



9. View toward proposed tower location, Northeast.



10. View toward proposed tower location, East.



11. View toward proposed tower location, Southeast.



12. View toward proposed tower location, South.





13. View toward proposed tower location, Southwest.



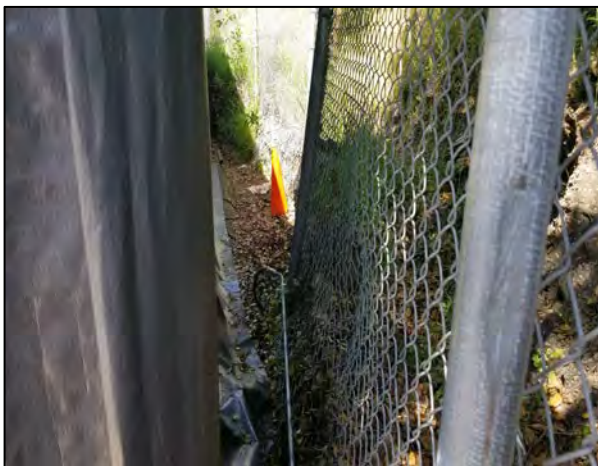
14. View toward proposed tower location, West.



15. View toward proposed tower location, Northwest.



16. View toward proposed tower location, North.



17. Overview of underground coax route, Northwest.



18. Overview of access driveway away from proposed tower location, Southeast.



19. Overview of access driveway toward proposed tower location, Northwest.



20. View of overhead power lines toward proposed tower location, East.



21. Overview of access driveway away from proposed tower location, Southeast.



22. Overview of access entrance toward proposed tower location, Northwest.



23. View toward Power Line (1) toward proposed tower location, East.



24. Overview of access driveway away from proposed tower location, East.



25. Overview of access driveway toward proposed tower location, West.



26. View toward Piedmont Community Church Historic Property, West.



27. View from Piedmont Community Church Historic Property toward proposed tower location, North/Northeast.



28. View toward Mountain View Cemetery Historic District, Northeast.



29. View from eastern extent of Mountain View Cemetery Historic District toward proposed tower location, East.

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 11. SHPO Specific Forms**

The cover sheet it is attached.

Applicant's Name: Delta Oaks Group, PLLC  
Project Name: Piedmont Corp Yard  
Project Number: 639072  
FCC Form 620

Approved by OMB  
3060-1039

See instructions for  
Public burden estimates

**Attachment 12. Maps**

**Include one or more 7.5-minute quad USGS topographical maps that:**

- a. Identify the Areas of Potential Effects for both Direct and Visual Effects. If a map is copied from the original, include a key with the name of quad and date.**
- b. Show the location of the proposed site and any access roads or other easements including excavations.**
- c. Show the locations of each property listed.**
- d. Include keys for any symbols, colors, or other identifiers.**
- e. Submit color maps whenever possible.**

The following map has been attached to this report:

7.5-minute Topographic Map




0.5-Mile Area of Potential Effect Map

*Please refer to Appendix B for Site Maps*




Service Layer Credits Copyright © 2013 National Geographic Society, Esri

### Piedmont Corp Yard RS Map

-  Project Location
-  1/2 Mile APE
-  USGS 7.5' Quads

0 .25 .5 1  
 Kilometers

0 .25 .5 1  
 Miles

Proposed Tower Location: Oakland East  
 USGS 7.5' Quad  
 LL: 37.831986, -122.229706



1:24,000



Created by PK

**Kimberly Grimwood**

---

**From:** towernotifyinfo@fcc.gov  
**Sent:** Tuesday, May 22, 2018 10:45 AM  
**To:** Kimberly Grimwood  
**Subject:** Section 106 New Filing Submitted- Email ID #2911808

The following new Section 106 filing has been submitted:

File Number: 0008220098  
TCNS Number: 170920  
Purpose: New Tower Submission Packet  
Notification Date: 7AM EST 05/23/2018  
Applicant: GST Capital Partners, LLC/Delta Oaks Group, PLLC  
Consultant: NWB Environmental Consulting, LLC on behalf of Trileaf Corporation  
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No  
Site Name: Piedmont Corp Yard  
Site Address: 898 Red Rock Road  
Detailed Description of Project: Legal Description: No Township Found.  
Site Coordinates: 37-49-55.2 N, 122-13-46.9 W  
City: Piedmont  
County: ALAMEDA  
State:CA  
Lead SHPO/THPO: California Office of Historic Preservation

Consultant Contact Information:

Name: NWB Environmental Consulting, LLC on behalf of Trileaf Corporation  
Title: Archaeologist  
PO Box:  
Address: 3033 Fifth Avenue  
Suite 210  
City: San Diego  
State: CA  
Zip: 92103  
Phone: 480-850-0575  
Fax:  
Email: k.grimwood@trileaf.com

**NOTICE OF FRAUDULENT USE OF SYSTEM, ABUSE OF PASSWORD AND RELATED MISUSE**

Use of the Section 106 system is intended to facilitate consultation under Section 106 of the National Historic Preservation Act and may contain information that is confidential, privileged or otherwise protected from disclosure under applicable laws. Any person having access to Section 106 information shall use it only for its intended purpose. Appropriate action will be taken with respect to any misuse of the system.



**DEPARTMENT OF PARKS AND RECREATION  
OFFICE OF HISTORIC PRESERVATION**Lisa Ann L. Mangat, *Director*

Julianne Polanco, State Historic Preservation Officer  
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100  
Telephone: (916) 445-7000 FAX: (916) 445-7053  
[calshpo.ohp@parks.ca.gov](mailto:calshpo.ohp@parks.ca.gov) [www.ohp.parks.ca.gov](http://www.ohp.parks.ca.gov)

June 29, 2018

Reply In Reference To: FCC\_2018\_0529\_006

Michelle Noble  
Trileaf Environmental & Property Consultants  
10845 Olive Blvd., Suite 260  
St. Louis, MO 63141

RE: The Piedmont Corp Yard Tower Installation Project, 898 Red Rock Road,  
Piedmont, Alameda County, New Tower

Dear Ms. Noble:

The Office of Historic Preservation (OHP) received your submittal initiating consultation on behalf of the Federal Communications Commission (FCC) regarding compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800. The consultation has been submitted pursuant to the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission, September 2004 (PA)*. The applicant is requesting OHP to concur that the above referenced undertaking will not affect historic properties.

The FCC licensee or tower company (applicant) proposes to construct and operate an unmanned cellular communications facility at the above-referenced address. The applicant has submitted a description of the project (including design drawings); maps; photographs; and, evidence of having completed a regional Information Center (IC) record search of the California Historical Resources Information System (CHRIS), Native American (NA) consultation, and public notification.

Having reviewed submitted information, OHP concurs that the proposed undertaking as described will not affect historic properties. In the advent of ground disturbing work expose cultural artifacts, please halt all such work at the location of the exposure until an archaeologist who meets the Secretary of the Interior's (SOI) Professional Standards and Qualifications can be consulted to determine the nature and significance of the find.

Please note that under certain circumstances, such as an unanticipated discovery or a change in the project description, there may be additional future responsibilities for this

Ms. Michelle Noble  
29 June 2018  
Page 2 of 2

ATTACHMENT D

Agenda Report Page 202 of 231  
FCC\_2018\_0529\_006

undertaking under 36 CFR Part 800. Please direct questions to Michelle C. Messinger, State Historian II at (916) 445-7005 or [Michelle.Messinger@parks.ca.gov](mailto:Michelle.Messinger@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by a horizontal line extending to the right.

Julianne Polanco  
State Historic Preservation Officer

**Appendix F**  
Native American Correspondence

## Tribal Summary Table

Site: SUNNYSIDE

Site ID: BU #880304

TCNS Number: 167065

TCNS Initial Notification Date: 2/9/2018

Tribe	TCNS auto-reply	Follow Up Request from Tribe		Follow Up(s) to Tribe		Final Reply		FCC Referral	Standing Agreements & Comments	GFP Utilized?
		Date	Requested Information	Date	Sent	Date	Comments			
California Valley Miwok Tribe	Please send information packet			5/29/2018	Sent Letter & project documentation	5/30/2018	No interest. Requests inadvertent discovery notification.			No
Eastern Shoshone Tribe	Please send information packet Please send SHPO reply Please send fee Interested in Consultation Other: Form 620/621	4/19/2018	SHPO Reply Consultation fee Cultural Report Photos Maps Other: Site plans, Form 620/621, project coordinates	5/29/2018	Sent Letter, fee, & project documentation	6/29/2018	FINDING OF NO CULTURAL PROPERTIES - The potential for cultural resources to be present within or near your proposed project is low and should not result in an adverse effect. Requests inadvertent discovery notification.			No
Los Coyotes Reservation	30 days no interest Notify of inadvertent discovery					5/20/2018	Cleared Per NOO			No
Northwestern Band of Shoshone Nation	Please send fee	4/18/2018	Other: We have an interest in this site and would like the applicant to contact us.	5/29/2018	Sent Letter & project documentation	6/21/2018	We have no issues with any historic properties within the APE that we have affiliation to. Requests scope change and inadvertent discovery notification.			No
Santa Rosa Rancheria Tachi Yokut Tribe				5/29/2018	Sent Letter & project documentation	7/4/2018	Cleared by Referral	6/14/2018		No
Scotts Valley Rancheria/Scotts Valley Band of Pomo Indians				5/29/2018	Sent Letter & project documentation	7/4/2018	Cleared by Referral	6/14/2018		No
Skull Valley Band of Goshute Indians	Please send fee Other: Previous SHPO/THPO response on collocations	4/18/2018	Other: We have an interest in this site and would like the applicant to contact us.	5/29/2018	Sent Letter, Fee, & project documentation	6/6/2018	We have no issues with any historic properties within the APE that we have affiliation to. Requests scope change and inadvertent discovery notification.			No
Wilton Rancheria	Please send information packet Please send fee Other: Additional fees will apply if monitor is requested.			5/29/2018	Sent Letter, fee, & project documentation	6/7/2018	Project may proceed. Requests inadvertent discovery notification.			No



10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 [www.trileaf.com](http://www.trileaf.com)

May 29, 2018

**California Valley Miwok Tribe**

Ms. Anjelica Paulk  
4620 Shippee Lane  
Stockton, CA 95212

RE: **Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**

898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W  
UTM Zone: 51S 432215mE 4187453mN  
Survey area: 0.023 acres  
**TCNS# 170920**; Legal Description: *No Township Found*

Dear Ms. Paulk:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The archeological report is enclosed for your reference. The SHPO response will be sent as soon as it is available. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**From:** towernotifyinfo@fcc.gov  
**To:** [tribal](mailto:tribal@trileaf.com)  
**Cc:** [tcns.fccarchive@fcc.gov](mailto:tcns.fccarchive@fcc.gov); [office@cvmt.net](mailto:office@cvmt.net)  
**Subject:** Reply to Proposed Tower Structure (Notification ID: 170920) - Email ID #5814843  
**Date:** Wednesday, May 30, 2018 11:52:21 PM

---

Dear Mindi L Okai,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Vice Chairperson Anjelica Paulk of the California Valley Miwok Tribe in reference to Notification ID #170920:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 04/17/2018  
Notification ID: 170920  
Tower Owner Individual or Entity Name: Delta Oaks Group, PLLC  
Consultant Name: Mindi L Okai  
Street Address: 10845 Olive Blvd.  
Suite 260  
City: St. Louis  
State: MISSOURI  
Zip Code: 63141  
Phone: 314-997-6111  
Email: [tribal@trileaf.com](mailto:tribal@trileaf.com)

Structure Type: MTOWER - Monopole  
Latitude: 37 deg 49 min 55.2 sec N  
Longitude: 122 deg 13 min 46.9 sec W  
Location Description: 898 Red Rock Road  
City: Piedmont  
State: CALIFORNIA  
County: ALAMEDA

Detailed Description of Project: Legal Description: No Township Found.  
Ground Elevation: 126.9 meters  
Support Structure: 30.5 meters above ground level  
Overall Structure: 30.5 meters above ground level  
Overall Height AMSL: 157.4 meters above mean sea level

**From:** towernotifyinfo@fcc.gov  
**To:** [tribal](#)  
**Cc:** [tcns.fccarchive@fcc.gov](#)  
**Subject:** Reply to Proposed Tower Structure (Notification ID: 170920) - Email ID #5744617  
**Date:** Thursday, April 19, 2018 6:33:55 PM

---

Dear Mindi L Okai,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from THPO Josh Mann of the Eastern Shoshone Tribe in reference to Notification ID #170920:

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, New Mexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands. Please utilize the online Tribal 106 processing system to submit your project details, at <http://iresponse106.com>.

Your submission should include:

- Appropriate SHPO determination or response letter
- Cultural Resource report and/or Archaeological Survey Report
- Photographic project site documentation
- Topographic or Quadrangle Maps
- Site Plans/Construction Drawings
- FCC Forms 620 and 621
- Latitudinal and longitudinal coordinates for the proposed project
- Project coordinator contact information

The Eastern Shoshone Tribe has established a processing fee of \$500.00 per consultation, which facilitates review of each project online in a timely manner.

The Eastern Shoshone Tribe has established a 5G, DAS, Small Cell Support processing fee of \$100 per consultation with ground disturbance. A \$350 per consultation Batch up to 10 nodes and an additional \$30 for each additional node up to 20 nodes per single submitted review. Cultural resource report and proposed location map. All network nodes (5G, DAS/Small cell) within a 1 mile radius, in the same county

We are only able to accept checks at this time; no online payment method is currently available. Our 30-day review period will commence once all project details have been submitted to the Tribal 106 processing database. If you have any questions, please feel free to contact the Eastern Shoshone THPO, Josh Mann, [jmann@easternshoshone.org](mailto:jmann@easternshoshone.org) or by phone (307) 335-2081. Consultation Research Officer, Falene Russette [falene.russette@iresponse106.com](mailto:falene.russette@iresponse106.com) or by phone (406) 395-4215. Thank you for consulting with the Eastern Shoshone Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 04/17/2018  
Notification ID: 170920  
Tower Owner Individual or Entity Name: Delta Oaks Group, PLLC  
Consultant Name: Mindi L Okai  
Street Address: 10845 Olive Blvd.  
Suite 260  
City: St. Louis  
State: MISSOURI  
Zip Code: 63141  
Phone: 314-997-6111  
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole  
Latitude: 37 deg 49 min 55.2 sec N  
Longitude: 122 deg 13 min 46.9 sec W  
Location Description: 898 Red Rock Road  
City: Piedmont  
State: CALIFORNIA  
County: ALAMEDA

Detailed Description of Project: Legal Description: No Township Found.  
Ground Elevation: 126.9 meters  
Support Structure: 30.5 meters above ground level  
Overall Structure: 30.5 meters above ground level  
Overall Height AMSL: 157.4 meters above mean sea level



**ENVIRONMENTAL • ARCHITECTURE • ENGINEERING**

10845 Olive Boulevard, Suite 260, Saint Louis, Missouri 63141 • 314.997.6111 www.trileaf.com

May 29, 2018

**Eastern Shoshone Tribe**Mr. Josh Mann  
P.O. Box 538  
Ft. Washakie, WY 82514**RE: Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W  
UTM Zone: 51S 432215mE 4187453mN  
Survey area: 0.023 acres  
**TCNS# 170920**; Legal Description: *No Township Found*

Dear Mr. Mann:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The Form 620/621, site maps, construction drawings and photos are enclosed for your reference. The review fee is in the mail. The SHPO response will be sent as soon as it is available. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager



Shoshone Finance  
 P.O. Box 538  
 Fort Washakie, WY 82514  
 (307) 332-6804/3043  
 Fax: (307) 332-0429

To: Trileaf Corporation  
 Date: Jun 29, 2018  
 Project: Piedmont Corp Yard  
 TCNS Number: 170920

X	<p><b>FINDING OF NO CULTURAL PROPERTIES</b> - The potential for cultural resources to be present within or near your proposed project is low and should not result in an adverse effect. However, if cultural materials are discovered during construction please notify the Eastern Shoshone Tribal Historic Preservation Office.</p>
---	--

After reviewing the materials you provided on the above referenced project, the Eastern Shoshone Tribal Historic Preservation Department finds that there may be a low potential for historic/cultural materials to be present during the proposed undertaking.

The Eastern Shoshone Tribe has a long and storied history throughout a very large swath of the present day United States that we consider our aboriginal home lands. No further cultural resource work is necessary for this project as long as the areas outlined are adhered to. If additional work is necessary outside the areas designated, please notify our department to make the necessary arrangements.

If potential cultural resources are located during construction, please notify our office immediately. Thank you for consulting with the Eastern Shoshone Tribal Historic Preservation Office. If you have any questions or concerns, please feel free to contact me at (307) 335-2081 or (307) 349-6406 or email me at [wferris.eshoshone@gmail.com](mailto:wferris.eshoshone@gmail.com) Thank you.

---

Wilfred Ferris, III  
 Tribal Historic Preservation Officer

**From:** towernotifyinfo@fcc.gov  
**To:** [tribal](mailto:tribal@trileaf.com)  
**Subject:** Reply to Proposed Tower Structure (Notification ID: 170920) - Email ID #5739171  
**Date:** Wednesday, April 18, 2018 9:02:45 AM

---

Dear Mindi L Okai,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Attorney Montana & Associates LLC of the Northwestern Band of Shoshone Nation in reference to Notification ID #170920:

We have an interest in this site and would like the applicant to contact us.  
Montana & Associates LLC  
605-881-1227

Please email [Northwesternbandshoshonetcnsfcc@outlook.com](mailto:Northwesternbandshoshonetcnsfcc@outlook.com) for our review procedures which includes fees.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 04/17/2018  
Notification ID: 170920  
Tower Owner Individual or Entity Name: Delta Oaks Group, PLLC  
Consultant Name: Mindi L Okai  
Street Address: 10845 Olive Blvd.  
Suite 260  
City: St. Louis  
State: MISSOURI  
Zip Code: 63141  
Phone: 314-997-6111  
Email: [tribal@trileaf.com](mailto:tribal@trileaf.com)

Structure Type: MTOWER - Monopole  
Latitude: 37 deg 49 min 55.2 sec N  
Longitude: 122 deg 13 min 46.9 sec W  
Location Description: 898 Red Rock Road  
City: Piedmont  
State: CALIFORNIA  
County: ALAMEDA

Detailed Description of Project: Legal Description: No Township Found.  
Ground Elevation: 126.9 meters  
Support Structure: 30.5 meters above ground level  
Overall Structure: 30.5 meters above ground level  
Overall Height AMSL: 157.4 meters above mean sea level

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May 29, 2018

**Northwestern Band of Shoshone Nation**

Mr. George Gover  
707 N. Main Street  
Bringham City, UT 84302

RE: **Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**

898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W  
UTM Zone: 51S 432215mE 4187453mN  
Survey area: 0.023 acres  
**TCNS# 170920**; Legal Description: *No Township Found*

Dear Mr. Gover:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The site location maps are enclosed for your reference. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**From:** [Northwestern Band Of The Shoshone Nation](#)  
**To:** [Mindi Okaj](#)  
**Subject:** TCNS Reviews Northwestern Band Shoshone Nation  
**Date:** Thursday, June 21, 2018 12:28:44 PM

---

The Northwestern Band of Shoshone Nation has reviewed TCNS 169187 170649 172956  
171331 171330 171921 170656 170920 171326 171373 171551 171318 171374  
171333 171385 171327 170871

Thank-you for the necessary documentation for us to review your proposed projects. We have no issues with any historic properties within the APE that we have affiliation to. Please contact us in the event the ground disturbance inadvertently uncovers human remains and or archaeological/cultural material. Should any changes in the project be made please notify this office of the changes before further project planning continues.

Thank-you.

Montana & Associates LLC For  
Northwestern Band Of The Shoshone Nation  
N 12923 N Prairie Rd  
Osseo, WI 54758

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May 29, 2018

**Santa Rosa Rancheria Tachi Yokut Tribe**

Mr. Hector (Lalo) Franco

16835 Alkali Dr.

Lemoore, CA 93245

**RE: Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**

898 Red Rock Road, Piedmont, California 94611

Alameda County, Oakland Quadrangle (USGS)

Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W

UTM Zone: 51S 432215mE 4187453mN

Survey area: 0.023 acres

**TCNS# 170920**; Legal Description: *No Township Found*

Dear Mr. Franco:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The site location maps are enclosed for your reference. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai

Tribal Consultation Manager

**From:** towernotifyinfo@fcc.gov  
**To:** [tribal](#)  
**Cc:** [tcnsweekly@fcc.gov](#)  
**Subject:** Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #22061  
**Date:** Thursday, June 14, 2018 8:00:50 AM

---

Verizon Wireless  
Mindi L Okai  
10845 Olive Blvd.  
Suite 260  
St. Louis, MO 63141

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's recent Declaratory Ruling (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 06/07/2018 and 06/14/2018. Our contact with these Tribal Nations or NHOs was sent on 06/14/2018.

Thus, as described in the Declaratory Ruling (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 20 calendar days of 06/14/2018, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete(3). If a Tribal Nation or NHO responds that it is interested in participating within the 20 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

You are reminded that Section IX of the NPA imposes independent obligations on an Applicant when a previously unidentified site that may be a historic property, including an archeological property, is discovered during construction or after the completion of review(4). In such instances, the Applicant must cease construction and promptly notify, among others, any potentially affected Tribal Nation or NHO. A Tribal Nation's or NHO's failure to express interest in participating in pre-construction review of an undertaking does not necessarily mean it is not interested in archeological properties or human remains that may inadvertently be discovered during construction. Hence, an Applicant is still required to notify any potentially affected Tribal Nation or NHO of any such finds pursuant to Section IX or other applicable law.

Sincerely,  
Jill Springer  
Acting Federal Preservation Officer  
Federal Communications Commission  
[jill.springer@fcc.gov](mailto:jill.springer@fcc.gov)

---

1) See Clarification of Procedures for Participation of Federally Recognized Indian Tribes and Native Hawaiian Organizations Under the Nationwide Programmatic Agreement, Declaratory Ruling, FCC 05-176 (released October 6, 2005) (Declaratory Ruling).

2) Id S 8-10.

3) We note that, under the Declaratory Ruling, an expression of interest by an Indian Tribe or NHO addressed solely to the Commission staff during the 20-day period is sufficient even if it does not contact the Applicant.

4) Id at S 11.

#### LIST OF PROPOSED COMMUNICATIONS TOWERS

TCNS# 165224 Referred Date: 06/13/2018 Location: 2660 Peck Avenue, Riverton, WY

TCNS# 170660 Referred Date: 06/13/2018 Location: 12054 Lake Branch Rd, Franklin, TX  
Detailed Description of Project: Legal Description: No Township Found.  
Tribe Name: Tonkawa Tribe  
Tribe Name: Apache Tribe of Oklahoma

TCNS# 168654 Referred Date: 06/13/2018 Location: 3700 Cedar Point Rd, Raleigh, IL  
Detailed Description of Project: Legal Description: S3 T8S R6E  
Tribe Name: Fort Belknap Indian Community  
Tribe Name: Quapaw Tribe of Oklahoma  
Tribe Name: Cherokee Nation  
Tribe Name: Kaw Nation  
Tribe Name: Wyandotte Nation  
Tribe Name: Peoria Tribe of Indians of Oklahoma  
Tribe Name: Iowa Tribe of Oklahoma

TCNS# 170207 Referred Date: 06/13/2018 Location: 111 S. Garland Ave, Garland, TX  
Detailed Description of Project: Legal Description: No Township Found.  
Tribe Name: Coshatta Indian Tribe  
Tribe Name: Cherokee Nation  
Tribe Name: Comanche Nation  
Tribe Name: Alabama Quassarte Tribal Town  
Tribe Name: Tonkawa Tribe  
Tribe Name: Apache Tribe of Oklahoma

TCNS# 170654 Referred Date: 06/13/2018 Location: 720 East Wild Rose Lane, Washington, UT  
Detailed Description of Project: Legal Description: S2 T43S R15W  
Tribe Name: Crow Tribe  
Tribe Name: Shoshone-Bannock Tribes, Cultural Resources

TCNS# 170689 Referred Date: 06/13/2018 Location: 103 East Piccadilly, Winchester, VA  
Detailed Description of Project: Legal Description: No Township Found.  
Project Description: Project is a collocation with NO Ground disturbance.  
Tribe Name: Cherokee Nation

TCNS# 170690 Referred Date: 06/13/2018 Location: 5201 Ocean Avenue, Wildwood, NJ  
Detailed Description of Project: Legal Description: No Township Found.  
Project Description: Project is a collocation with NO Ground disturbance.  
Tribe Name: Wyandotte Nation

TCNS# 170659 Referred Date: 06/13/2018 Location: 2207 Lawrenceville Road, Lawrenceville, NJ  
Detailed Description of Project: Legal Description: No Township Found.  
Project Description: Project is a collocation with less than 500 square feet of ground disturbance in already disturbed ground.  
Tribe Name: Wyandotte Nation

TCNS# 170920 Referred Date: 06/13/2018 Location: 898 Red Rock Road, Piedmont, CA  
Detailed Description of Project: Legal Description: No Township Found.  
Tribe Name: Scotts Valley Rancheria  
Tribe Name: Santa Rosa Rancheria Tachi Yokut Tribe

TCNS# 171385 Referred Date: 06/13/2018 Location: 714 S. College Ave., Fort Collins, CO  
Detailed Description of Project: Legal Description: S13 T7N R69W  
Project Description: Project is a collocation with less than 500 square feet of ground disturbance in already disturbed ground.  
Tribe Name: Ute Indian Tribe



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May 29, 2018

**Scotts Valley Rancheria/Scotts Valley Band of Pomo Indians**Mr. Shannon Ford  
81 Parr Boulevard  
Richmond, CA 94802**RE: Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W  
UTM Zone: 51S 432215mE 4187453mN  
Survey area: 0.023 acres  
**TCNS# 170920**; Legal Description: *No Township Found*

Dear Mr. Ford:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The site location maps are enclosed for your reference. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**From:** towernotifyinfo@fcc.gov  
**To:** [tribal](#)  
**Subject:** Reply to Proposed Tower Structure (Notification ID: 170920) - Email ID #5738820  
**Date:** Wednesday, April 18, 2018 8:16:20 AM

---

Dear Mindi L Okai,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Attorney Montana & Associates LLC of the Skull Valley Band of Goshute Indians in reference to Notification ID #170920:

We have an interest in this site and would like the applicant to contact us.  
Montana & Associates LLC  
605-881-1227

The Skull Valley Band of Goshute has review procedures which includes fees.  
Please send a letter via email to [skullvalleybandgoshutefcctcns@outlook.com](mailto:skullvalleybandgoshutefcctcns@outlook.com) to initiate the 106 consultation process.

Thank you.

Montana & Associates LLC  
N12923 North Prairie Rd  
Osseo, WI 54758  
1-605-881-1227

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 04/17/2018  
Notification ID: 170920  
Tower Owner Individual or Entity Name: Delta Oaks Group, PLLC  
Consultant Name: Mindi L Okai  
Street Address: 10845 Olive Blvd.  
Suite 260  
City: St. Louis  
State: MISSOURI  
Zip Code: 63141  
Phone: 314-997-6111  
Email: [tribal@trileaf.com](mailto:tribal@trileaf.com)

Structure Type: MTOWER - Monopole  
Latitude: 37 deg 49 min 55.2 sec N  
Longitude: 122 deg 13 min 46.9 sec W  
Location Description: 898 Red Rock Road  
City: Piedmont  
State: CALIFORNIA  
County: ALAMEDA

Detailed Description of Project: Legal Description: No Township Found.  
Ground Elevation: 126.9 meters  
Support Structure: 30.5 meters above ground level  
Overall Structure: 30.5 meters above ground level  
Overall Height AMSL: 157.4 meters above mean sea level



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May 29, 2018

**Skull Valley Band of Goshute Indians**

Ms. Candace Bear  
P.O. Box 448  
Grantsville, UT 84029

RE: **Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**

898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W  
UTM Zone: 51S 432215mE 4187453mN  
Survey area: 0.023 acres  
**TCNS# 170920**; Legal Description: *No Township Found*

Dear Ms. Bear:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The site location maps, construction drawings and photos are enclosed for your reference. The review fee is in the mail. The SHPO response will be sent as soon as it is available. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**From:** [Montana Associates LLC Skull Valley Band of Goshute](#)  
**To:** [Mindi Okaj](#)  
**Subject:** TCNS Reviews Skull Valley Band of Goshute  
**Date:** Wednesday, June 06, 2018 3:35:30 PM

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The Skull Valley Band of Goshute has reviewed TCNS 170871 171385 170656 170920  
171551

Thank-you for the necessary documentation for us to review your proposed projects. We have no issues with any historic properties within the APE that we have affiliation to. Please contact us in the event the ground disturbance inadvertently uncovers human remains and or archaeological/cultural material. Should any changes in the project be made please notify this office of the changes before further project planning continues.

Thank-you.

---

**MONTANA & ASSOCIATES, LLC**  
N 12923 N Prairie Rd.  
Osseo, WI 54758

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May 29, 2018

**Wilton Rancheria**Mr. Antonio Ruiz  
9728 Kent Street  
Elk Grove, CA 95624**RE: Delta Oaks Group, PLLC – Piedmont Corp Yard / Client #CA2016003 – Trileaf Project #639072**898 Red Rock Road, Piedmont, California 94611  
Alameda County, Oakland Quadrangle (USGS)  
Latitude: 37° 49' 55.15" N, Longitude: 122° 13' 46.94" W  
UTM Zone: 51S 432215mE 4187453mN  
Survey area: 0.023 acres  
**TCNS# 170920**; Legal Description: *No Township Found*

Dear Mr. Ruiz:

This project was originally submitted to your tribe via TCNS on April 20, 2018; TCNS #170920. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a 100-foot Slimline Monopole Communications Tower and associated equipment within an approximately 1,000 square foot lease area. The proposed project area would be accessed via an existing asphalt paved driveway connected to Red Rock Road. The proposed project is currently located in an asphalt paved parking area. The site location maps and photos are enclosed for your reference. The review fee is in the mail. Please let us know if you have any objections or comments on this project as soon as possible.

Please call me at (314) 997-6111 or email [m.okai@trileaf.com](mailto:m.okai@trileaf.com) or [tribal@trileaf.com](mailto:tribal@trileaf.com) if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Mindi Okai  
Tribal Consultation Manager

**From:** [Antonio Ruiz](#)  
**To:** [Mindi Okai](#)  
**Cc:** [Ed Silva](#)  
**Subject:** FW: TCNS # 170920 - Wilton Rancheria - For Review (Alameda County)  
**Date:** Thursday, June 07, 2018 1:03:10 PM  
**Attachments:** [TCNS # 170920 Wilton Rancheria.pdf](#)

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Hello Mindi,

After review, the only concern that the Tribe has with the above projects is that when ground disturbance occurs, there is a possibility that Native American artifacts and/or human remains may be uncovered. Therefore, the Applicant should immediately stop construction and notify Wilton Rancheria and the appropriate Federal and State Agencies. Such provisions are stated in the; Archaeological Resources Protection Act (ARPA) [16 USC 469], Native American Graves Protection and Repatriation Act (NAGPRA) [25 U.S.C. 3001-30013], Health and Safety Code section 7050.5, and Public Resources Code section 5097.9 et al.

If you have any additional questions, please do not hesitate to contact me.

In addition, I am confirming I am in receipt of Check #86839 (\$650.00) Review Fee.

Thank you,  
Antonio



Antonio Ruiz  
Cultural Resources Officer  
Department of Environmental Resources | Wilton Rancheria  
Tel: 916.683.6000 Ext. 2005 | Fax: 916.683.6015  
9728 Kent Street | Elk Grove | CA | 95624  
[aruiz@wiltonrancheria-nsn.gov](mailto:aruiz@wiltonrancheria-nsn.gov)  
[www.wiltonrancheria-nsn.gov](http://www.wiltonrancheria-nsn.gov)

Customer Service Hours: M-F 8:00am-3:00pm.

Please be aware phone calls and emails will be answered only during these hours.

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**From:** Mindi Okai <[m.okai@trileaf.com](mailto:m.okai@trileaf.com)>  
**Sent:** Friday, June 1, 2018 7:51 AM  
**To:** Antonio Ruiz <[aruiz@wiltonrancheria-nsn.gov](mailto:aruiz@wiltonrancheria-nsn.gov)>  
**Subject:** TCNS # 170920 - Wilton Rancheria - For Review

Hello,

Please find attached the project information, archeology report, site maps, and photos describing the subject project.

**Appendix G**  
Resumes





# JESSICA RUSSELL

## SENIOR PROJECT SCIENTIST

### Education

B.S. Geology  
California State University Northridge / Northridge, CA

### Areas of Expertise

Ms. Russell has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM) for commercial real estate and lending projects.

Ms. Russell has experience executing environmental due diligence projects throughout various regions of the United States, and specializes in California and the Southwestern Region.

Environmental service expertise includes the preparation and/or review of:

Phase I Environmental Site Assessments	Historical Topographic Maps and Aerial Imagery
Phase II Environmental Site Assessments	Land Use History
Historical City Directories	Soil and Groundwater Management Plans
Indoor Air Quality Assessments	Local Government Consultation
Field Reconnaissance	National Wetlands Inventory Maps
Groundwater Well Installation and Monitoring	Flood Insurance Rate Maps
Soil Vapor Sampling and Well Installation	Migratory Bird Evaluations
Soil Characterization	Environmental Evaluation Summaries
Underground Storage Tank Assessment/Removal	Subcontractor Management

Ms. Russell has experience performing Phase I and Phase II Environmental Site Assessments for various property types including commercial, industrial, agricultural and residential properties.

Additionally, Ms. Russell has conducted gamma radiation surveying for the characterization of the Santa Susana Field Laboratory Area IV Radiological Study for USEPA Region 9 Federal Facilities project; studied the effects of soil moisture on gamma radiation measurements; and has worked closely with biological, cultural, and Native American monitors to protect sensitive species and areas.

### Certifications/Affiliations

OSHA 40-Hour HAZWOPER  
ANSI/FCC RF Radiation Safety Competent Person  
American Red Cross First Aid, CPR, and AED Certification  
Environmental Professional (EP) as defined by ASTM Standard E1527-13 (AAI)



# KIMBERLY GRIMWOOD

## PROJECT SCIENTIST II

### Education

B.S. Environmental Science / Emphasis in Ecology  
The University of Arizona / Tucson, AZ

### Areas of Expertise

Ms. Grimwood has experience performing site inspections and conducting environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM), as well as performing National Environmental Policy Act (NEPA) reviews for commercial real estate, lending, and wireless telecommunications projects.

Ms. Grimwood has experience executing environmental due diligence projects throughout various regions of the United States, and specializes in the Western Region.

Environmental service expertise includes the preparation and/or review of:

Phase I Environmental Site Assessments	Field Reconnaissance
Historical City Directories	Historical Topographic Maps and Aerial Imagery
Informal Section 7 Consultation	Land Use History
National Wetlands Inventory Maps	Section 106 Compliance
Flood Insurance Rate Maps	NEPA Environmental Assessments
Critical Habitat Maps	Form 620/621 Submittals
Soil Characterization	Local Government Consultation
Archaeological and Architectural Impacts	Native American Consultation

Additionally, Ms. Grimwood has experience in data collection, biological sampling, field work, and writing and proposing environmental remediation plans.

### Certifications/Affiliations

ANSI/FCC RF Radiation Safety Competent Person  
Adult Child Infant C.A.R.E. CPR & First Aid Certification  
Burrowing Owl Field Certification, U.S. Fish and Wild Life Service and Arizona Game and Fish  
Salt River Pima-Maricopa Indian Community Cultural Sensitivity Training



# PATRICK MARCHINA

## PROJECT MANAGER

### Education

B.S. Biology  
Purdue University / West Lafayette, IN

### Areas of Expertise

Mr. Marchina has experience with the investigation and management of environmental due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM), as well as National Environmental Policy Act (NEPA) and environmental permitting projects. Mr. Marchina operates as the primary point-of-contact for clients over a large geography, specializing within the Southeast Region of the United States.

Environmental service expertise includes:

Environmental Site Assessments	Vendor Management
Environmental Evaluation Summaries	Critical Habitat and Species Review
Indoor Air Quality Assessments	Migratory Bird Evaluations
CERCLA Liability	Nationwide Programmatic Agreement Review
FCC Regulatory Compliance	Soil Characterization
NEPA Environmental Assessments	DAS In-Building Limited Site Inspections
FAA Aeronautical Studies	Local Government/Agency Coordination
Environmental Permitting	Lead and Asbestos Analysis

### Certifications/Affiliations

Environmental Professional (EP) as defined by ASTM Standard E1527-13 (AAI)  
Licensed Environmental Professional  
OSHA 40-Hour HAZWOPER  
ANSI/FCC RF Radiation Safety Competent Person  
Certified Florida Mold Assessor – License #MRSA685  
Florida Association of Environmental Professionals  
Central Florida Association of Environmental Professionals

**PIEDMONT PLANNING COMMISSION**

Regular Meeting Minutes for Monday, March 8, 2021 - EXCERPT

A Regular Session of the Piedmont Planning Commission was held March 8, 2021, via ZOOM teleconference consistent with Executive Order Nos. N-25-20 and N-29-20 and the Alameda County Health Official's Order #20-04. In accordance with Government Code Section 54954.2(a), the agenda for this meeting was posted for public inspection on February 22, 2021.

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**CALL TO ORDER**

Chair Alessio called the meeting to order at 6:15 p.m.

**ROLL CALL**

Present: Commissioners Allison Alessio, Rani Batra, Yildiz Duransoy, Tom Ramsey, Alternate Commissioner Doug Strout

Absent: Commissioner Jonathan Levine

Staff: Planning & Building Director Kevin Jackson, Senior Planner Pierce Macdonald-Powell, Associate Planner Gopika Nair, Assistant Planner Steven Lizzarago, Planning Technician Suzanne Hartman, Administrative Assistant Mark Enea

**PUBLIC FORUM**

There were no speakers for the public forum.

**ANNOUNCEMENTS**

Planning & Building Director Kevin Jackson introduced Suzanne Hartman, who has joined staff as a planning technician.

Planning Technician Suzanne Hartman shared her work experience and thanked everyone for a warm welcome.

**REGULAR SESSION**

The Commission considered the following items of regular business:

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**Wireless  
Communication  
Facility Permit  
898 Red Rock Road**

Gulf South Towers/GST Capital Partners, LLC, proposes to construct a 95-foot-tall telecommunications tower and associated site improvements. The proposed tower and base station include space for up to four wireless service providers on land located in the City of Piedmont Public Works corporation yard. The proposed tower will replace an existing 31-foot-tall tower (T-Mobile) in generally the same location. The project includes an approximately 6-foot-tall retaining wall along the north edge of the installation, 8-foot-tall fencing surrounding the base station equipment, and an 8-foot-tall ice bridge conduit to conceal cabling running from the base station enclosures to the proposed tower.

**Public testimony** was received from:

Richard Hirsch, Applicant representative, reported the project is a 95-foot-tall monopole telecommunications tower located in the City of Piedmont corporation yard. The tower can be painted in a color that minimizes its visibility. The location is fairly ideal for a new telecommunications tower facility. There are no residential properties immediately adjacent to the site. Also proposed is a 76-foot-wide by 20-foot-deep equipment enclosure at the base of the tower. The facility will accommodate the four major carriers and provide sufficient capacity and coverage for the northern half of Piedmont.

Without this facility, the four carriers are likely to submit individual applications for multiple smaller or similar facilities. Designing the facility as a realistic-looking water tower would reduce the height to 30-40 feet, which would not provide sufficient coverage. GST has no opinion as to whether 5G technology is incompatible with stealth tower design. A shroud is a cover that hides the appearance of antennas or equipment. A shroud is not a component of the proposed facility. The fencing around the equipment could be chain-link with green vinyl slats or an 8-foot-tall wood privacy fence. A good number of coaxial and cables will run up the center of the monopole and attach to the antennas, which will extend no more than 12 inches from the pole and will hide the cable connections. According to best practices and standards, the number of visible cables will be reduced as much as possible. The four sets of antennas will be mounted 5 feet apart as measured top to bottom. Each carrier will have its own equipment area, and each area will have a pad for a temporary backup generator to supply power in the event of an outage. Generators will be brought to the site as needed but will not be stored onsite. The noise study found that noise levels will comply with the City's noise ordinance when equipment for all four carriers is operating and when all equipment and emergency generators are operating.

Jack Vosney, Applicant consultant, shared simulated ground and aerial views of the project.

Matt Huffty, Gulf South Towers representative, provided coverage maps prepared by T-Mobile and AT&T. The tower will provide additional telephone and data capabilities, allow carriers to deploy 5G equipment, and improve 911 emergency services. The existing installation cannot accommodate additional carriers or new equipment. Planning Department staff recommended that GST use a monopole rather than a stealth installation such as an artificial tree. Coaxial cables have been painted to match the pole in other installations. The equipment cabinets will have interior lighting, but there will be no exterior lighting at the facility.

Planning Director Jackson clarified that the Code sets preferences that new facilities be available for collocation of multiple carriers so as to limit the number of wireless facilities in the City. An artificial tree installation would have more bulk and be harder to maintain than a monopole installation. The favored location for facilities is City property because the City, as the landlord, has more authority to control the construction and design of facilities. Residents notify staff frequently regarding inadequate coverage around Moraga Canyon. Staff believes additional coverage from a facility in the area will benefit residents.

Senior Planner Pierce Macdonald-Powell explained that the Wireless Communications Facility (WCF) permit contains conditions of approval for all future building permit submittals. A condition of approval will require a cabling plan that shows how cabling will be concealed and controlled and will reiterate the restrictions against exposed cables and spooling. The applicant has removed the large area labeled as reserved for backup generators from the site plans and replaced it with a smaller area in each carrier's space.

Deepti Sethi, Vincent Fisher, Eric Eric Eisemon, Daphney Albert, and Richard Saykally expressed concerns about the height of the pole and its impact on property values, views, and quality of life; requested installation of a story pole, more detailed plans, and a coverage map for Piedmont alone; and inquired about

insurance coverage for the equipment causing a brushfire, radio frequency (RF) emissions, and additional technical matters.

Mr. Hirsch and Mr. Huffty responded to questions from the public with the following statements. The Section B cross section shows the tower will be approximately 20 feet below and approximately 300 feet away from the homes along Abbot Way. The RF emissions report indicates that the maximum public exposure would be 15.3% of the maximum exposure limit. The pole height could be reduced, but it would not accommodate collocation for the four carriers.

Director Jackson responded to questions from the public with the following statements. The City is sufficiently covered by the insurance requirements contained in the lease agreement. Installing a 95-foot story pole would be dangerous.

Mark Wessell, Applicant consultant, explained the methodology he used in preparing the RF emissions report.

Generally, the Commission appreciated the slim and compact design of the tower, the location at the corporation yard, the omission of stealth design that would add to the bulk of the facility, and compliance with the City's noise ordinance. Commissioners suggested the tower and cabling be painted a neutral matte color to reduce its visibility. Commissioner Ramsey recommended staff require additional detail regarding cable management, remove the reference to a shroud in the report, and require cable management and antenna mounting to be consistent across carriers.

**Resolution 07-PL-21**

RESOLVED, that the Planning Commission recommends that the City Council determine the wireless communications facility (WCF) permit application to be categorically exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15303 of the CEQA Guidelines because the proposed wireless communication facility is a small utility structure located in a developed setting which replaces an existing telecommunications tower. No exceptions to the exemption have been identified that would make the proposal ineligible for the categorical exemption because the project's setting is not environmentally sensitive, the surrounding area is developed and urbanized, existing utilities are located at or near the proposed telecommunications tower installation, there are no unusual circumstances relating to the proposed installation, and no scenic highways, hazardous waste sites, or historical resources could be affected by the project.

FURTHER RESOLVED, that the Planning Commission recommends the City Council approve the WCF permit, as conditioned, based on the findings and associated conditions of approval as presented in the revised draft resolution attached to the March 8, 2021 staff report as Attachment F and with the Planning Commission's recommended revisions to the conditions of approval to: 1) clarify that the structure, cabling and pole-mounted equipment be painted a neutral non-reflective color; and 2) help minimize the visual bulk of pole-mounted equipment through cable management, color, consistency among the four carriers, and the avoidance of shrouds if the antennas and other equipment can directly receive paint.

Moved by Batra, Seconded by Strout

Ayes: Batra, Duransoy, Ramsey, Strout, Alessio  
Noes: None  
Abstaining: None  
Absent: Levine

The Commission recessed at 8:57 p.m. and reconvened at 9:10 p.m.

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**ADJOURNMENT**

...Chair Alessio adjourned the meeting at 10:50 p.m.

**Item #6 – Consideration of a Wireless Comms. Facility Permit at 898 Red Rock Road  
Correspondence Received before 12:00 Noon on Monday, April 19<sup>th</sup>**

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The request for input is a baseline courtesy that should be extended to all Piedmont residents. However, there is a difference between a request for meaningful/actionable input and checking off a box. I do hope the efforts of myself and my neighbors are given adequate consideration. There is a valid concern regarding the potential impact on property value (as Piedmont should know given the objection to other cell phone tower plans throughout the city) and the quality of life/enjoyment of one's property. What impact does the City itself think the WCF will have on property values and perception of this side of Piedmont? Please know, I am not debating the scientific basis of radiation exposure or validity of concern regarding adverse health impacts, the question is how does the presence of a WCF tower impact decision making in the general home buying population and the impact on property values? It appears that the City would have already considered this due to City Code [17.68.040](#) which has one item concerns property values.

**17.68.040 Findings.**

The Planning Commission may recommend and the City Council may approve a conditional use permit only after making the following findings:

The use will not have a material adverse effect on the health, safety or welfare of persons residing or working in the vicinity. Considerations for this finding include: no substantial increase in traffic, parking, or noise; no adverse effect on the character of the neighborhood; no tendency to adversely affect surrounding property values.

Here is some information on cell towers' impact on property values:

1. <https://www.parealtors.org/cell-towers-impact-property-values/#:~:text=The%20Impact%20of%20Cell%20Phone,to%20a%20sales%20price%20analysis.>
2. <https://ehtrust.org/cell-phone-towers-lower-property-values-documentation-research/>

Search for “kilometers” and “feet” you will find related data.

Other questions and considerations for the City Council and Planning Commission are that the FCC has 2 sets of rules/laws in favor of carriers that require a city to approve:

- a. small cell and distributed antenna system (DAS) wireless communication facilities
- b. the applicant demonstrates that the project meets federal safety requirements.

Here, the applicant has met the safety requirement. However, the requirement for “small” has not been met or justified. We know these rules helped Crown Castle in getting 17 wireless facilities approved in Piedmont. Among the 17, the following 5 are above 35ft (the height limit of the City Code 17.46.070.A.2)

150 Highland Ave (41'4")

303 Hillside Ave (46'4")

428 El Cerrito Ave (46'10")



355 Jerome Ave (48'4")  
1166 Winsor Ave (36'4")

Were these exceptions approved by the local community?

Is there a redundancy in having a 95 foot proposed tower when superimposed on the coverage afforded by the 17 other towers that have been approved? Specifically, why does the tower have to be 95ft high? How big an area will it cover in terms of reception, i.e. who will benefit from it? It does not appear to increase cell reception for the area of Moraga canyon and up the hillside where reception is completely absent/spotty based on the location justification exhibit, however it does seem logical that reception would be much better. Can you please clarify? Do the "increased" reception maps reflect coverage after the other 17 towers are in place?

What is the counterbalance to these concerns? Is there a meaningful gain for the city of Piedmont? What is the role of the city? Who is paying the City? The GST or the carriers directly? Is this tower shared among 4 carriers...is this the last tower proposed in the area?

Abbott Way is not included in the plans. There is no city support for us to determine the impacts outside of our own research and asking for more clarity because the plans completely mislabel or disregard our existence. We need to make sure we have a clear indication of what the impact will potentially be for our street. We need updated plans and photographs, including imposed views of the Abbott Way hillside and the view of the tower from the cul-de-sac. The most accurate means of gauging visual impact would be story poles. Related to this aspect, what is the design plan?

Per the City Code "17.46.070 Standards"

Visual impact. Wireless communication facilities must be designed to minimize visual impacts. When feasible, the facilities must be concealed or camouflaged. The facilities must have a non-reflective finish and be painted or otherwise treated to minimize visibility and the obstruction of views.

The residents of Abbott Way and those with a direct view need to have input into this process and the appearance of the tower itself. The feasibility of concealment and camouflage from street level is different from the view looking down upon this. The current plans/impact are focused on the view from Moraga and do not take the view from the Abbott Way hillside into account.

In the City Planner's review/report, the application complies 17.46.070.A.2 Height limit pursuant to Section 17.22.030, which points back to 17.46. Please answer the following question as it is unclear on the face of the review itself.

**17.22.030 Conditional uses.**

The following are allowed as conditional uses in Zone B:

- A. City building used by a for-profit commercial entity.
- B. Wireless communication facility, subject to a wireless communication facility permit (rather than a use permit) under division 17.46.

**17.22.040 Regulations.**

B. In Zone B, for residential use:

Lot area; frontage; coverage; height; front, rear and side yards; floor area ratio. All as set forth for Zone A. See section 17.20.040.

17.22.040 doesn't mention non-residential use. "Pursuant to Section 17.22.040, there are no limits on lot area, frontage, coverage, height, setbacks, and floor area ratio, in Zone B for non-residential uses. **Complies.**" Question: Does that make this verdict in the review report correct?

There is a substantiated suspicion of the City when it comes to consideration of the impact on Piedmont residents in our particular neighborhood. The credibility of the City in regard to living up to its own assurances has been compromised (this is a direct reference to the City's backpedaling on lights in Coaches Field). For this reason (as well as being subject to piecemeal plans regarding lights, discussions of housing developments, and now inadequate information regarding the impact of the cell phone tower on the road that directly overlooks it) we ask for the overall development plan for Corporation Yard, Coaches Field and Blair Park. A clear potential for impacts from different development projects resulting in a significant decrease in property value exists for residents of Abbott Way, among others. We deserve and need information on all projects aggregated. This is necessary for any property owner to determine the impact on view, property value, and enjoyment of the unique personality of this particular street/neighborhood/property.

Thank you,  
Deepti Sethi  
Rabin Nabizad

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To the members of the City Council and Planning Commission.

We are residents of Abbott Way and were dismayed to learn of plans for a new 95 foot tall cell phone tower in the Corporation Yard which sits right below our street. Apparently, only some of the residents on the street received notification of the plans and tonight's planning meeting to discuss the proposal.

We have multiple concerns, but of primary concern, is our ability to protect the value of our homes. While there may be scientific data regarding the safety of 5G cell towers, there is a public perception that these towers are unsafe. As we are all painfully aware living through a pandemic, science and data do not trump perception in the current times in which we live. Social media is not governed and misinformation, more often than not, gets amplified. As such, it is a legitimate concern that the placement of the cell tower will directly negatively impact the value of the homes on our street.

The impact on property values is a real concern as documented by the following articles:

1. <https://www.parealtors.org/cell-towers-impact-property-values/#:~:text=The%20Impact%20of%20Cell%20Phone,to%20a%20sales%20price%20analysis>.
2. <https://ehtrust.org/cell-phone-towers-lower-property-values-documentation-research/>

From the plans that I saw, Abbott way was not even included. The City therefore seems eager to bypass their citizens' input based on current intentions. Can we have updated plans and photographs that include (correct) views of Abbott Way, which is the street that is closest to the proposed cell tower?

Our understanding is that 17 other cell towers have been approved in Piedmont. Given the number of cell towers in Piedmont, what will the coverage be in terms of reception? In one document that I viewed, it appeared that cell coverage will improve for those in the center of Piedmont but not for those of us in the Moraga canyon area.

Why is the height of this cell phone tower so much taller (up to 3x in height) than all of the other ones in town? What is the justification for a 95ft high cell tower? Is there a plan for a story pole, so that residents can understand the visual impact to our views from such a very tall cell tower?

Ultimately, this neighborhood feels that the City of Piedmont has consistently disregarded the residents' input on issues that directly impact our distinctive neighborhood, especially since we don't have the density of most of Piedmont. We have been subject to renege promises (and actual legal agreements) regarding lights on Coaches field and the development of Blair Park. The proposed cell tower is yet another data point for the frustration felt in our neighborhood.

I would like more information regarding the proposed cell tower. Additionally, I hope that this committee will consider the request to engage residents in the discussion of any project proposals before "dumping" them on us as a forgone conclusion.

Rami and Daphne Albert

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Dear Council,

I am the property owner of 8 Abbott Way. Regarding to the "PROPOSED 95-FT MONOPOLE TOWER by GST", I have two questions, pertinent to the City Code 17.68.040 and 17.22.030.

I. City Code [17.68.040](#), which concerns property values.

**17.68.040 Findings.**

The Planning Commission may recommend and the City Council may approve a conditional use permit only after making the following findings:

3. The use will not have a material adverse effect on the health, safety or welfare of persons residing or working in the vicinity. Considerations for this finding include: no substantial increase in traffic, parking, or noise; no adverse effect on the character of the neighborhood; no tendency to adversely affect surrounding property values.

**17.68.040.3 is NOT satisfied**, because numerous reports (a few samples listed below) saying that cell towers affect property values negatively.

1. <https://www.parealtors.org/cell-towers-impact-property-values> from Pennsylvania Association of Realtors. It says “A recent survey by the National Institute for Science, Law & Public Policy (NISLAPP) found that 94 percent of homebuyers are “less interested and would pay less” for a property located near a cell tower or antenna.”
2. <https://ehtrust.org/cell-phone-towers-lower-property-values-documentation-research>

[Wireless Towers and Home Values: An Alternative Valuation Approach Using a Spatial Econometric Analysis](#) (*Journal of Real Estate Finance & Economics*, May 1, 2018)

For properties located within 0.72 kilometers of the closest tower, results reveal significant social welfare costs with values declining 2.46% on average, and up to 9.78% for homes within tower visibility range compared to homes outside tower visibility range; in aggregate, properties within the 0.72-kilometer band lose over \$24 million dollars.

[The Cost of Convenience: Estimating the Impact of Communication Antennas on Residential Property Values](#) (*Land Economics*, Feb. 2016)

“Re a study on property in Kentucky- “The best estimate of the impact is that a property with a visible antenna located 1,000 feet away sells for 1.82% (\$3,342) less than a similar property located 4,500 feet away. The aggregate impact is \$10.0 million for properties located within 1,000 feet”

## II. City Code 17.46.070 Standards

A. Development Standards. The following development standards apply.

2. Height limits; Screening. No wireless communication facility may exceed 35 feet in height, measured from the ground to the highest point of the wireless communication facility, unless the zoning district in which the wireless communication facility is located expressly provides a higher height limit. Ground mounted wireless communication equipment, base station, antenna, pole, or tower must be the minimum functional height, unless a variance is granted. Roof mounted equipment and antennas must be located to minimize visibility.

The staff report approves that the application complies 17.46.070.A.2 Height limit pursuant to Section 17.22.030, which points back to 17.46.

### ***Zone B Development Regulations Division 17.22***

The City corporation yard is located in Zone B, the public facilities zone. Pursuant to Section 17.22.030, a wireless communication facility is permitted as a conditional use in Zone B.

Pursuant

to Section 17.22.040, there are no limits on lot area, frontage, coverage, height, setbacks, and floor

area ratio, in Zone B for non-residential uses. ***Complies.***

### **Height Limit**

The application proposes a WCF installation with a maximum height of 95 feet, excluding the

additional height of the lightning rod. The height limit for wireless communication facilities in the City Code (section 17.46.070.A.2) is 35 feet, unless the zoning district in which the wireless communication facility is located expressly provides a higher height limit. Pursuant to Section 17.22.030, a non-residential use is expressly excluded from the development standards for lot area, frontage, coverage, height, setbacks, and floor area ratio. A wireless communication facility is a non-residential use allowed in Zone B.

Section 17.22.040 does NOT say “there are no limits on lot area, frontage, coverage, height, setbacks, and floor area ratio, in Zone B for non-residential uses.”

**17.46 and 17.22 are looping to one another without satisfying either.**

III. Is a 95-foot tower what we the Piedmont residents want?

The application listed numerous benefits. But who decided those are what we want? For years we have been living with the poor cell signal. With data communication Apps and broadband connections, we don't want a 95 feet tower.

For the communities that want the benefits, they can get SMALL cell and distributed antenna system (DAS) wireless communication facilities, as deployed by Verizon in central Piedmont.

Even if we consider collocations, why do we need to accommodate 4 carriers, instead of 2 carriers? It will be shorter and less visible and more acceptable. The tower has got only one tenant now.

Thank you,  
Qiu Yuan Liu

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As the City of Piedmont embarks on a challenging Housing Element process that will require it to leave no stone unturned in the search for potential housing sites, we hope the city will ensure that the new cell tower does not interfere with the Corporation Yard's viability as a possible housing site.

Irene Cheng and Sarah Karlinsky  
Co-Chairs, Piedmont Racial Equity Campaign Housing Committee