

# ATTACHMENT H

## Agency Comments Received

1	Central Valley Regional Water Quality Control Board	July 29, 2025
2	Caltrans District 3	July 9, 2025
3	Yocha Dehe Cultural Resources Dept	February 27, 2025
4	Public Works Division	December 23, 2024
5	Environmental Health Division	December 19, 2024
6	Northwest Information Center	December 19, 2024
7	PG&E Plan Review Team	December 3, 2024

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## Central Valley Regional Water Quality Control Board

29 July 2025

Aaron Brown  
Yolo County  
292 West Beamer Street  
Woodland, CA 95695  
[aaron.brown@yolocounty.gov](mailto:aaron.brown@yolocounty.gov)

### **COMMENTS TO REQUEST FOR REVIEW FOR THE NEGATIVE DECLARATION, HARLAN RANCH CELL TOWER MAJOR USE PERMIT (ZF#2024-036) PROJECT, SCH#2025070236, YOLO COUNTY**

Pursuant to the State Clearinghouse's 3 July 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Negative Declaration* for the Harlan Ranch Cell Tower Major Use Permit (ZF#2024-036) Project, located in Yolo County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

#### **I. Regulatory Setting**

##### **Basin Plan**

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_2018\\_05.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.



Peter G. Minkel  
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento

Carl Jones AT&T Mobility  
[carl.jones@epicwireless.net](mailto:carl.jones@epicwireless.net)

**From:** [Gross, Morgan@DOT](mailto:Gross.Morgan@DOT) on behalf of [D3 Local Development@DOT](mailto:D3_Local_Development@DOT)  
**To:** [Aaron Brown](mailto:Aaron.Brown)  
**Subject:** RE: Notice of Intent - Harlan Ranch Cell Tower Major Use Permit (ZF2024-036)  
**Date:** Wednesday, July 9, 2025 3:21:20 PM

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**CAUTION: External Sender. Please do not click on links or open attachments from senders you do not trust.**

Good afternoon

Thank you for including the California Department of Transportation (Caltrans) in the review process of the proposed Harlan Ranch Cell Tower. We wanted to reach out and let you know we have no comments at this time.

Please provide our office with copies of any further actions regarding this project as we would appreciate the opportunity to review and comment on any changes related to this project.

Should you have questions regarding these comments or require additional information, please contact me by phone (530) 720-2778 or via email at [D3.local.development@dot.ca.gov](mailto:D3.local.development@dot.ca.gov).

Thank you!

**Morgan Gross**

Transportation Planner | Local Development Review and Complete Streets  
Division of Planning, Local Assistance, and Sustainability  
Caltrans, District 3  
Phone: (530) 720-2778  
Email: [morgan.gross@dot.ca.gov](mailto:morgan.gross@dot.ca.gov)

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**From:** Aaron Brown <[Aaron.Brown@yolocounty.gov](mailto:Aaron.Brown@yolocounty.gov)>  
**Sent:** Tuesday, July 8, 2025 9:01 AM  
**Subject:** Notice of Intent - Harlan Ranch Cell Tower Major Use Permit (ZF2024-036)

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Good Morning,

Please see the attached Notice of Intent (NOI) for the **Harlan Ranch Cell Tower Major Use Permit** (ZF#2024-036).

A 30-day public review period of the Initial Study/Negative Declaration (IS/ND) commenced on **Wednesday, July 2, 2025, and will end on Friday, August 1, 2025**, during which interested individuals and public agencies may submit written comments on the document.

Any written comments on the IS/ND must be received within the public review period. Additional details regarding how to submit comments and access the materials online can be found within the attached NOI.

Thank you,

*Aaron Brown*

**Assistant Planner**

Department of Community Services

292 W Beamer Street

Woodland, CA 95695

**Phone:** (530)406-4717

**OFFICE HOURS: Mon - Thurs 8AM-4:00PM (Closed 12-1PM)/ Fri 8AM-12PM**



YOCHA DEHE  
CULTURAL RESOURCES

February 27, 2025

Yolo County  
Attn: Aaron Brown, Assistant Planner  
292 W Beamer Street  
Woodland, CA 95695

RE: ZF2024-036 MUP Harlan Ranch Cell Tower YD-12102024-02

Dear Mr. Brown:

Thank you for your project notification letter dated Monday, January 13, 2025, regarding cultural information on or near the proposed ZF2024-036 MUP Harlan Ranch Cell Tower. We appreciate your effort to contact us and wish to respond.

The Cultural Resources Department has reviewed the project and concluded that it is within the aboriginal territories of the Yocha Dehe Wintun Nation. Therefore, we have a cultural interest and authority in the proposed project area.

Based on the information provided, Yocha Dehe Wintun Nation is not aware of any known cultural resources near this project site and a cultural monitor is not needed. However, if any new information is available or cultural items are found, please contact the Cultural Resources Department.

Should you have any questions, please contact:

Yocha Dehe Wintun Nation  
Cultural Resources Department  
Office: (530) 796-3400  
Email: [THPO@yochadehe.gov](mailto:THPO@yochadehe.gov)

Please refer to identification number YD-12102024-02 in correspondence concerning this project.

Thank you for providing us the opportunity to comment.

Sincerely,

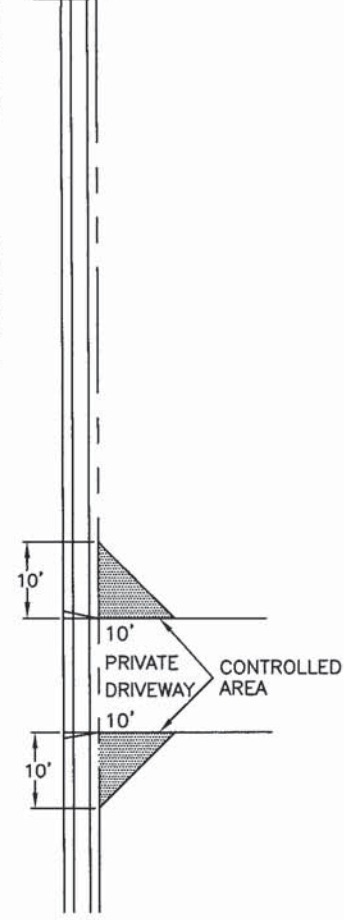
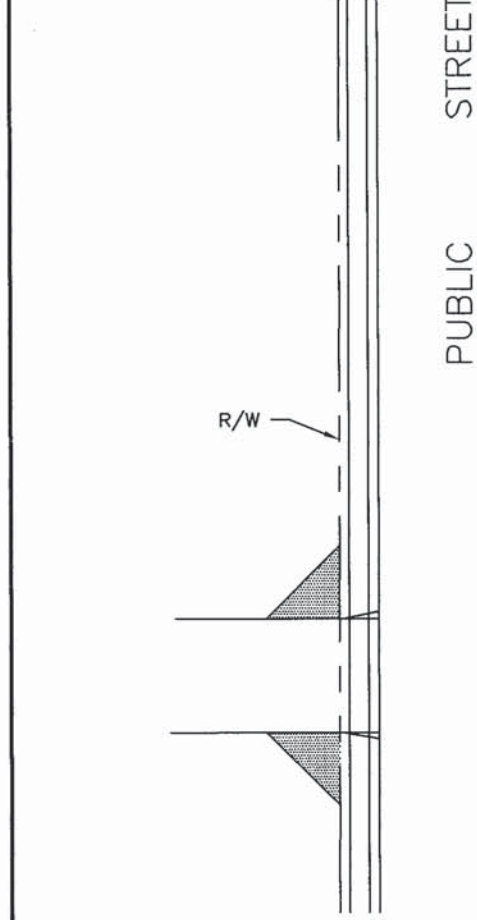
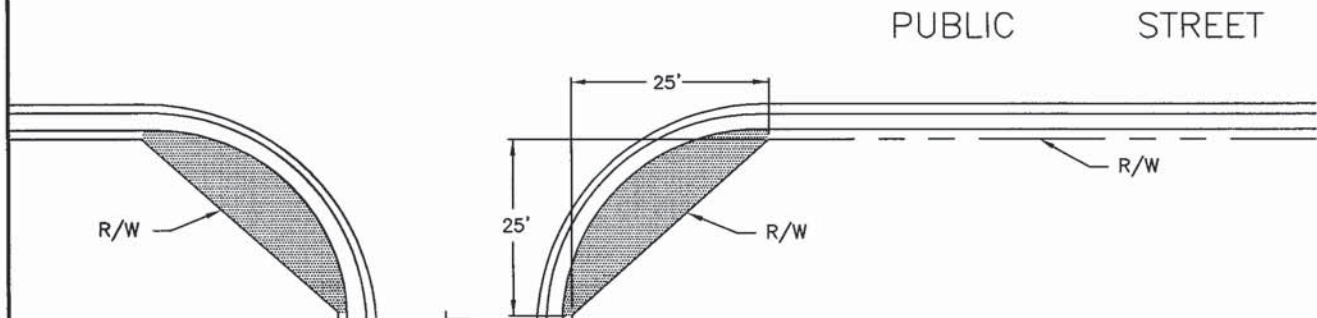
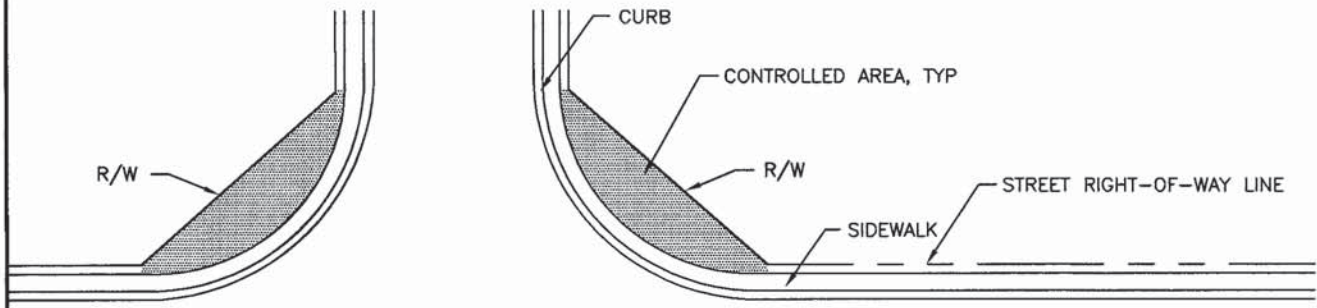
Signed by:  
  
8DD0BD089ED6438...  
Tribal Historic Preservation Officer

**PUBLIC WORKS DIVISION CONDITIONS OF APPROVAL  
ZF2024-036, Harlan Ranch Cell Tower**

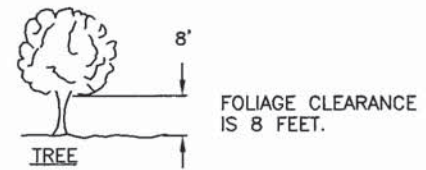
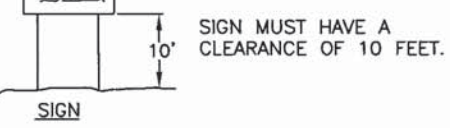
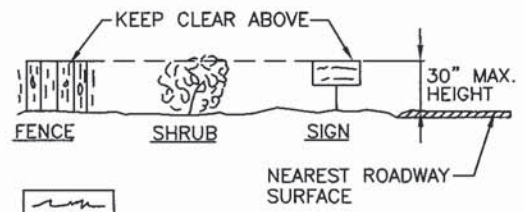
1. The applicant shall apply for a County encroachment permit for any proposed work within the county right-of-way, which includes County Road (CR) 99, or any activity that might impact traffic. Contact [ppw@yolocounty.org](mailto:ppw@yolocounty.org) for encroachment permit inquiries.
2. Driveway visibility shall be maintained per Yolo County Improvement Standards Drawing # 4-13 at a minimum. Landowners are responsible for tree maintenance along the property frontage to County roads.
3. Signs associated with the business are not permitted in county road right-of-way.
4. Any damages to CR 99 due to applicant's activities are to be repaired to County Standards at applicant's expense.
5. Provide ongoing maintenance of gravel parking areas and access roads, including but not limited to, stabilizing any areas that have eroded, preventing the downstream conveyance of sediment, and providing dust control.
6. County right-of-way shall not be used for event/business/operations parking.
7. The applicant shall file a Record of Survey, prepared by a licensed surveyor in the State of California, whenever any of the following instances occur:
  - a. A legal description has been prepared that is based upon a new field survey disclosing data that does not appear on any previously filed Subdivision Map, Parcel Map, Record of Survey, or other official map.
  - b. Permanent monuments have been set marking any boundary.
  - c. Additional right-of-way was dedicated to the County.

The applicant shall reimburse the County for all activities associated with County Surveyor review (County Zone File No. ZF2024-036).

8. If the development disturbs one acre or more of land, the developer must obtain coverage under California's "National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (State General Permit)" for controlling construction activities that may adversely affect water quality. State General Permit coverage requires preparation of a Storm Water Pollution Prevention Plan (SWPPP). The developer shall provide Yolo County its State-issued Waste Discharge Identification Number (WDID #), and pay associated fees, prior to issuance of a County building or grading permit.



**CLEARANCE REQUIRED  
WITHIN CONTROLLED AREA**



<b>COUNTY OF YOLO</b> PLANNING AND PUBLIC WORKS DEPARTMENT		DATE: 08/05/08
<b>VISIBILITY REQUIREMENTS AT          INTERSECTIONS AND DRIVEWAYS</b>		SHEET # 1 OF 1
<i>Paros Kallas</i> COUNTY ENGINEER No. C42401	28 AUG 08 APPROVAL DATE	DRAWING #: <b>4-13</b> NOT TO SCALE



# County of Yolo

DEPARTMENT OF COMMUNITY SERVICES  
PUBLIC WORKS DIVISION

Taro Echiburú  
DIRECTOR

292 West Beamer Street, Woodland, CA; 95695-2598; (530) 666-8775; FAX (530) 666-8156; [www.yolocounty.org](http://www.yolocounty.org)

**Date:** May 17, 2021

**Subject:** Foliage/Tree Maintenance Required By Landowners Along County Roads

**Dear LANDOWNER:**

As a landowner in Yolo County you are required to trim the foliage/trees along the frontage of your property. If not properly cared for, foliage/trees can become a potential safety hazard to the traveling public. Attaining a safe distance between traffic and the foliage/trees adjacent to roads and sidewalks will maintain safe roadways by increasing visibility both for vehicle clearance and access. In addition, regular maintenance of foliage keeps trees healthy, subsequently providing cleaner air, cooler temperatures, natural insect and pest control, and a pleasing landscape in our county. As a landowner, you are responsible for the maintenance of foliage/trees on your property and along the frontage to public and private roads.

The maintenance guidelines for foliage and tree trimming adjacent to county roads are as follows:

- *Trim foliage/trees to maintain: a minimum **twenty-foot (20)** vertical clearance from the vehicle travel way; a minimum **five-foot (5)** horizontal clearance from road shoulders, sidewalks and bike paths or to the trunk of the tree; and a minimum **eight-foot (8)** vertical clearance for all branches over sidewalks and bike paths. Please have your contractor contact Public Works encroachment permit staff (see below) for a no-cost encroachment permit for traffic control along the county road.*
- *Remove all dead, diseased and crossing or crowded limbs to allow light penetration through the foliage/tree canopy, including all insect-infested limbs and those with any structural defects to reduce future safety hazards.*

It should also be understood that according to the State of California Streets and Highways Code Section 1480.5, a property owner may be liable for damage caused by the foliage/trees located on their property, and the expense of removal from the public right of way. Yolo County appreciates your assistance in keeping your foliage/trees maintained to the standards outlined above and partnering with the County in preserving public safety.

If you have any questions or need clarification on these requirements, please contact Public Works encroachment permit staff at (530) 666-8775 or [ppw@yolocounty.org](mailto:ppw@yolocounty.org).

Sincerely,

Nicholas S. Burton, P.E.  
Director of Public Works

<b>File Number:</b> ZF2024-036 <b>APN:</b> 039-030-017 <b>Address:</b> No Situs Address <b>Applicant:</b> Carl Jones (AT&T Representative) <b>Reviewer and date:</b> G. Walker, YCEH 12/19/2024 <b>Description:</b> Major Use permit allowing for construction of a new cell tower	[EH# FA0023136]
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Yolo County Environmental Health (YCEH) Division has reviewed project ZF2024-036 for a Major Use Permit on APN 039-030-017 to allow for the construction and operation of a 140' cell tower and associated equipment within a 30'x30' lease area on an agriculturally zoned parcel.

Please contact YCEH at 530-666-8646 for more information on the following comments:

- YCEH has no records on file for this parcel
- YCEH has no further comments

CALIFORNIA  
HISTORICAL  
RESOURCES  
INFORMATION  
SYSTEM



ALAMEDA HUMBOLDT SAN FRANCISCO  
COLUSA LAKE SAN MATEO  
CONTRA COSTA MARIN SANTA CLARA  
DEL NORTE MENDOCINO SANTA CRUZ  
MONTEREY SOLANO  
NAPA SONOMA  
SAN BENITO YOLO

**Northwest Information Center**  
Sonoma State University  
1400 Valley House Drive, Suite 210  
Rohnert Park, California 94928-3609  
Tel: 707.588.8455  
nwic@sonoma.edu  
<https://nwic.sonoma.edu>

December 19, 2022

File No.: 24-0801

Aaron Brown, Assistant Planner  
Yolo County  
Planning & Public Works Department  
292 West Beamer Street  
Woodland, CA 95695

re: ZF2024-036 MUP / APN: 039-030-017 / Carl Jones

Dear Aaron Brown,

Records at this office were reviewed to determine if this project could adversely affect cultural resources. **Please note that use of the term cultural resources includes both archaeological sites and historical buildings and/or structures. The review for possible historic-era building/structures, however, was limited to references currently in our office and should not be considered comprehensive.**

**Project Description:**

The proposed project is a request for approval of a Major Use Permit to allow for the construction and operation of a 140-foot tall monopole cell tower and associated equipment within a 30'x30' lease area on a ±23.79-acre parcel located in the Agricultural Intensive (A-N) Zone. The property (APN 039-030-017) is located immediately southwest of the City of Woodland, approximately 1/4-mile west of County Road 99, and approximately 500 feet south of El Paseo Drive. The property is currently planted in irrigated row crops, with no changes in farming operations proposed. There are no existing structures on the property, and no supplies or materials will be stored on site.

**Previous Studies:**

XX This office has no record of any previous cultural resource field survey for the proposed project area conducted by a professional archaeologist or architectural historian (*see recommendation below*).

**Archaeological and Native American Resources Recommendations:**

XX The proposed project area has the possibility of containing unrecorded archaeological site(s). A field study by a qualified professional archaeologist is recommended prior to commencement of project activities.

XX We recommend that the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at (916) 373-3710.

     The proposed project area has a low possibility of containing unrecorded archaeological site(s). Therefore, no further study for archaeological resources is recommended.

**Built Environment Recommendations:**

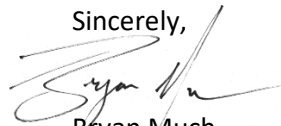
XX Since the Office of Historic Preservation has determined that any building or structure 45 years or older may be of historical value, if the project area contains such properties, it is recommended that prior to commencement of project activities, a qualified professional familiar with the architecture and history of Yolo County conduct a formal CEQA evaluation.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

For your reference, a list of qualified professionals in California that meet the Secretary of the Interior's Standards can be found at <http://www.chrisinfo.org>. If archaeological resources are encountered during the project, work in the immediate vicinity of the finds should be halted until a qualified archaeologist has evaluated the situation. If you have any questions please give us a call (707) 588-8455.

Sincerely,



Bryan Much  
Coordinator



December 3, 2024

Aaron Brown  
County of Yolo  
292 W Beamer St  
Woodland, CA 95695

Re: ZF2024-036  
Harlan Ranch Cell Tower

Dear Aaron Brown,

Thank you for providing PG&E the opportunity to review the proposed plans for ZF2024-036 dated 11/26/2024. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at [pgeplanreview@pge.com](mailto:pgeplanreview@pge.com).

Sincerely,

PG&E Plan Review Team  
Land Management