

370C

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



FROM: Public Safety Enterprise Communication Project Executive Steering Committee

SUBMITTAL DATE:
June 14, 2011

SUBJECT: PSEC Enhanced Coverage Sites Detail Design

RECOMMENDED MOTION: That the Board of Supervisors:

1. Consider the attached Addendum with the Final Environmental Impact Report for the County of Riverside's Public Safety Enterprise Communication (PSEC) Project, State Clearinghouse Number 2008021126;
2. Find that use of the sites referenced herein will not result in any new significant environmental effects, will not substantially increase the severity of previously identified significant effects and will not necessitate new mitigation measures;
3. Accept the enhanced portable coverage detail design and approve the additional communication sites; and,
4. Approve the use of Development Impact Fees, in the amount of \$1,700,000 for the expansion of Public Safety Radio Transmission sites, as needed, based on reimbursement for billings received.

(Continued on Page 2)

Stan Sniff
For Stan Sniff
Sheriff-Coroner-PA

John Hawkins
John Hawkins
Chief, County Fire

Nathan J. Colodney
Nathan J. Colodney
Chief Information Officer

FINANCIAL DATA	Current F.Y. Total Cost:	\$ 1.7 M.	In Current Year Budget: Yes
	Current F.Y. Net County Cost:		Budget Adjustment: No
	Annual Net County Cost:		For Fiscal Year: 11-12

SOURCE OF FUNDS: Development Impact Fees (Fund 30501)	Positions To Be Deleted Per A-30	<input type="checkbox"/>
	Requires 4/5 Vote	<input type="checkbox"/>

C.E.O. RECOMMENDATION: APPROVE

BY: *Serena Chow*
Serena Chow

County Executive Office Signature

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Buster, seconded by Supervisor Ashley and duly carried, IT WAS ORDERED that the above matter is approved as recommended.

Ayes: Buster, Stone, Benoit and Ashley
Nays: None
Absent: Tavaglione
Date: July 12, 2011
xc: Committee, EDA, Sheriff, Fire, EO

Kecia Harper-Ihem
Clerk of the Board
By: *[Signature]*
Deputy

Prev. Agn. Ref.: 01/30/07 3.42b, 03/31/09 3.33, 02/9/10 3.41, 6/15/10 3.20 | District: ALL | Agenda Number:

FORM APPROVED COUNTY COUNSEL
BY: NEAL R. KIPNIS
DATE: 6/15/11

Departmental Concurrence

Consent
 Policy
 Consent
 Policy
 Dept't Recomm.:
 Per Exec. Ofc.:

3.60

No other governmental agencies have implemented a system of the size and scope of Riverside County's – due to the sheer size of our county's boundaries and the technology being deployed.

After the project design work began, the Federal Communication Commission (FCC) mandated the rebanding of 800 MHz frequencies due to interference from commercial cellular transmitter sites – specifically, Sprint Nextel. The FCC, due to a shortage of 800 MHz spectrum, strongly encouraged that PSEC be reengineered and redesigned using the newly allocated 700 MHz frequency band, which is a spectrum reserved for public safety. As a result, Sprint Nextel was obligated to pay for Motorola reengineering expenses, County staff time and reimburse the County for the value of the current radios that will no longer operate under the new 700 MHz frequency band. The total reimbursement is \$6 million (\$3.0 million immediate payment and \$3 million reimbursed after current radios are returned to Sprint Nextel). Because the reengineering effort, as well as CEQA requirements related to site acquisitions, caused a twelve month delay, the Board of Supervisors approved a revised project completion date (3/31/09, #3.33) from the original completion date of October 2010 to October 2011.

The design of the new radio system included identifying sites for placement of fifty new radio towers. Once the required sites were identified, difficulties ensued in securing the sites. Protracted negotiations with property owners, federal government agencies, and state and federal environmental requirements caused a fourteen month delay in implementing the radio system necessitating changing the completion date to December 2012, and adding \$8.6 million in unanticipated expenses.

The final design coverage provided by Motorola, while providing the required mobile (car) coverage, did not provide the required portable (on hip) coverage. The PSEC Executive Steering Committee requested the PSEC Project Team and Motorola develop a solution to provide portable coverage. The enhanced coverage solution requires nine additional sites at an expense of \$2.66 million (\$1.72 million in land activity and a \$936,001 increase to the Motorola contract). The additional sites will be completed concurrent with the project and implementation of the entire completed system be fully activated by December 2012, assuming no further delays with property acquisition. Development Impact Fees (DIF) in the amount of \$2.66 million is available to fund the enhanced coverage solution.

On June 15, 2010 (M.O. 3.20) the Board of Supervisors approved the Fifth Amendment to the Motorola contract whereby the purchase of 3,200 radios was removed from the contract and a separate lease agreement with Motorola was entered into for radio leasing, resulting in a \$14 million reduction to the Motorola contract. This allowed the County to lease the original 3,200 radios plus 1500 additional radios (due to growth since the start of the project), thus avoiding \$8.9

million in additional radio purchases. As stated, in the June 5, 2010 Form 11, the rebanding credit from Sprint Nextel is to be applied to the radio lease payments through project completion. However, as a result of the project delays, the rebanding credit will not fully cover the radio lease payments through project completion. Therefore, an additional \$1,725,137 is needed to satisfy the radio lease agreement prior to the radio system activation. Upon activation, the radio lease agreement requires the user departments to make \$2.6 million annual radio lease payments to Motorola through 2020. Departments will commence making the monthly payments beginning January 2013.

Two non-PSEC costs arose in the past year that lacked funding and which the PSEC budget has been committed to fund. On October 19, 2010 the Board approved the use of \$1.5 million of PSEC funds to complete the FCC required Narrow Banding project to offset a cost of \$2.9 million the Fire Department needed to complete the Narrow Banding project. The second non-PSEC cost is the upgrade of the 911 Communications facility. Though not directly related to the PSEC project, \$1.7 million of PSEC funds have been committed to the upgrade, as well as an additional \$833,333 from the Radio Replacement Fund, for a total of \$2.5 million. In total, \$4 million has been diverted from the PSEC project to other needs. This represents approximately 35% of the original PSEC project contingency used for non-PSEC purposes. Neither of these costs was part of the original project, and therefore, has contributed to the increased project budget.

The original project budget included an \$11.3 million contingency, approximately 8.2% of the project budget. On February 9, 2010, Minute Order 3.41, the contingency was increased by \$4.1 million. With the leasing of radios, \$14 million was unallocated and available for contingency. These adjustments increased the project contingency to \$29.4 million. Since that time, site acquisition delays and related Motorola contract extension costs, the enhanced coverage solution, non-PSEC costs, and various change orders will potentially exhaust the contingency. These various project issues will, if all are approved, increase the project budget by \$11.1 million, increasing the project budget to \$159.4 million from \$148.3 million, a 4.1% increase. These issues, once resolved, will be brought back to the Board for approval.

PROJECT MANAGEMENT

During the course of this project a number of management missteps occurred. Contrary to industry practice, the previous RCIT management removed project budget authority from the project manager and retained that authority, while leaving the budget responsibility with the project manager. The bifurcated project budget management made it difficult for the project manager to monitor and manage project costs and plan for contingencies. RCIT Management allowed change orders to be negotiated with Motorola, approved by the PSEC Steering

Committee and work started, without proper change order delegation or Board of Supervisors approval. Finally, RCIT Management ceased to provide timely project updates to the Board of Supervisors. While the costs over-runs were unavoidable, the lack of proper management oversight jeopardized the successful completion of the project.

Current RCIT management is working to correct these errors by returning project budget oversight to the project manager and reinstating bi-monthly project updates to the Board of Supervisors. To insure the project is not delayed due to pending change orders, yet provide proper oversight, it is recommended that change order authority be delegated to the Purchasing Agent. The project has sensitive time lines and allowing the Purchasing Agent, with support from the PSEC team, to negotiate and approve necessary changes will expedite this process and help keep the project on track. Change orders that have been identified, but not yet approved by the Board, will be reviewed and vetted for necessity and cost reasonableness prior to approval by the Board.

This report has attempted to identify all costs associated with the PSEC project and a review of project management practices. As of the writing of this report, all known costs have been identified and included in the revised project budget. However, this was a review of the state of the current project budget and not an audit of the project budget and associated expenditures. There remains the risk of additional budget over-runs until the radio system is installed, tested and operational.

ANNUAL OPERATING COSTS

The annual operating budget of the PSEC Motorola radio system is projected to be \$13 million, consisting of approximately \$5 million in salary and benefits (appropriation 1) and \$8 million in other costs (appropriation 2, 3 and 4). This is an increase of over \$6 million in the annual operating cost of the current radio system. Although every effort has been made to minimize PSEC operational costs, this \$6 million cost increase was unavoidable given the sheer size of PSEC's coverage area and the system's complexity. In addition to the operating budget, the annual debt service payment for the bonds issued for the Motorola contract is \$11 million, bringing the total annual cost to \$24 million.

Coverage Area – PSEC's planned coverage area is 95% of the county or about 6,850 square miles, whereas the current radio system's coverage area is less than 4,300 square miles (less than 60% coverage). Achieving this 95% coverage area has necessitated the refurbishing of all 22 current radio sites and the addition of 54 more, for a total of 76 (almost 150% increase).

The operation and maintenance costs of each site have also increased due to a larger equipment "footprint". Among other things, the larger footprint has

increased the electrical and heat loads at each location, thus driving up electrical costs.

Furthermore, many of the sites are located in remote areas with no access to commercial power. Therefore, electricity at these remote sites must be supplied by co-located generators that run 24/7. Since fuel costs have spiked sharply in recent years, with no cost downturn projected, the high cost of fuel represents a significant portion of the increase in operational costs projected for PSEC (fuel costs alone are expected to be almost 10% of the PSEC operational budget).

Fleet and maintenance costs are also projected to increase significantly due to the large number of new sites that must be visited and maintained.

Complexity – The current 800 MHz system is a traditional analog radio system, with shared voice, very limited data services and little redundancy and system failover protection. The new PSEC Motorola communications system is a digital, computerized, and network-based environment, with fully segregated data and voice networks and extensive redundancy. The new system environment includes components and features that are minimal in comparison or do not exist in the current 800 MHz radio system, such as data and voice interoperability between county and non-county users and extensive data exchange between mobile users, both in vehicles and portable (on hip) devices. This has necessitated the deployment of new technology, such as 150 wireless network access points (4.9 data system “hotspots”) that requires new vendor software and hardware maintenance agreements to be established and network equipment to be installed.

For example, software maintenance costs paid to Motorola and other system vendors for radio system support is projected to be \$1.4 million. This is a new requirement that is not necessary with the current 800 MHz system.

Shared Governance – The oversight and management of PSEC will be through formal enterprise governance, with representation from Sheriff, Fire, CHA, TLMA, RCIT and other stakeholders, including new users who join the system. The PSEC Commission will work towards developing and enhancing the system in the years ahead for the benefit of its users and will be dedicated to the administration of the system, separate from the operational staff. There is no equivalent organization overseeing the current 800 MHz radio system.

Transmittal



COUNTY OF RIVERSIDE
ECONOMIC DEVELOPMENT AGENCY
DESIGN AND CONSTRUCTION DIVISION
3403 10th Street, 4th Floor
Riverside, CA 92501

Date: 3/16/2011

To: Lisa Alexen

Re: PSEC Addendum #3
Project No.: FM0417400010

Attn: Submittal of Revised Addendum #3 for F11

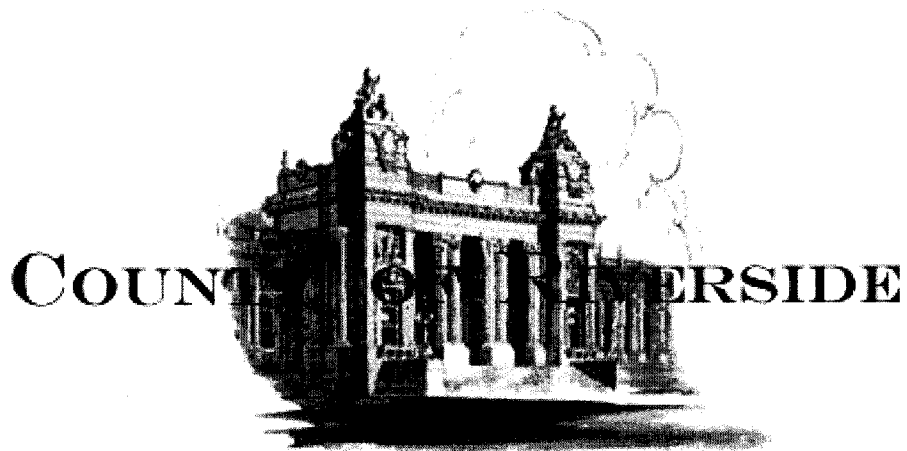
Delivery Via: Dropped off

Quantity	Description
1	Hard copy of Revised Addendum #3
5	CD's of Revised Addendum #3 for each of the Board of Supervisor's review

Remarks: Hi Lisa- Dan advised that the F11 is on hold for now, but he wanted you to have the revised documents when it is time to move forward. Thank you

Signed:

Claudia Steiding
Micro 5-8174



**Public Safety Enterprise Communication (PSEC) Project
Program Environmental Impact Report
Addendum No. 3
Communication Site Relocations and Additions**

Prepared for
County of Riverside
Economic Development Agency
Claudia Steiding, Senior Environmental Planner
(951) 955-8174

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List of Acronyms

BO	Biological Opinion
SR-195	Box Canyon Road
BLM	Bureau of Land Management
CEQA	California Environmental Quality Act
DTC/C-AMA	Desert Training Center/California-Arizona Maneuver Area
ESA	Endangered Species Act
HCP	Habitat Conservation Plan
HANS	Habitat Evaluation and Acquisition Negotiation Strategy
I-15	Interstate 15
MWD	Metropolitan Water District
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
PEIR	Program Environmental Impact Report
PSEC	Public Safety Enterprise Communication
RCA	Regional Conservation Authority
EPD	Riverside County Environmental Planning Department
SBNF	San Bernardino National Forest
SDSU	San Diego State University
SR	State Route
USFWS	U.S. Fish and Wildlife Service
WRMSHCP	Western Riverside Multiple Species Habitat Conservation Plan

Section 1 – Background

On September 2, 2008, the Riverside County Board of Supervisors adopted the Program Environmental Impact Report (PEIR) for the Public Safety Enterprise Communication (PSEC) project. The PEIR assessed the environmental impacts likely to result from the construction and operation of up to 65 communication sites throughout Riverside County and adjoining areas of San Bernardino, San Diego, and Orange Counties.

The findings of the PEIR are hereby incorporated by reference into this addendum. The PEIR determined that the environmental impacts associated with the project would be less than significant for the majority of the environmental issues that were analyzed. This finding was based on the fact that all of the PSEC sites are virtually identical and would have the same types of impacts regardless of where they were located. Issues found to result in either No Impact or a Less Than Significant Impact with No Mitigation Required were as follows:

- Agricultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities
- Climate Change

For several issue areas, the PEIR determined that potential impacts warranted the prescription of a number of standard mitigation measures. These mitigation measures were applicable to all of the sites, regardless of location. Issues found to result in a finding of Less Than Significant With Mitigation Required were as follows:

- Air Quality
- Biological Resources
- Cultural Resources
- Hydrology and Water Quality

The mitigation measures for biological and cultural resources included requirements for actions to be taken if a site were to change location or if additional sites not previously identified in the PEIR were proposed to be included as part of the overall PSEC project. The mitigation measures for air quality and hydrology and water quality were applicable to all sites, regardless of location or the specific characteristics present at a given site. Measures for biological resources and cultural resources, however, were applicable to all sites as well but were also specific to individual sites and areas. In addition, the measures for biological and cultural resources also included requirements for actions to be taken if a site were to change location or if additional sites not previously identified in the PEIR were proposed to be included as part of the overall PSEC project.

For one issue area, aesthetics, the PEIR determined that feasible mitigation to lessen the project's impacts in this regard was not available, and that the project's impact for this issue would be unavoidable and adverse.

Despite the project's potential unavoidable and adverse impact to aesthetic resources, the County determined that the project would provide specific safety benefits, increased communication, and other advantages that outweighed the unavoidable adverse

environmental impacts of the project, such that those impacts were considered acceptable. The benefits were defined as follows:

- 1) Completion of the project will increase emergency communication coverage in the County from 60 percent to 95 percent of the County's land area for emergency service personnel and their cooperators;
- 2) The increased communication coverage will provide immeasurable benefits for all residents within the County. With better coverage, there will be adequate communication capability during emergency incidents (including wildfires, earthquakes, large-scale releases of hazardous substances, and other natural or man-made disasters) that cross jurisdictional boundaries or require multiple-agency cooperation;
- 3) The project will provide a secure voice and data communication network that is not dependent upon commercial facilities for its operation;
- 4) The collocation of PSEC sites will reduce the number of individual communication sites that would otherwise be required if each agency were to construct their own separate facilities; and
- 5) When weighed against the potential for significant loss of life and property resulting from deficiencies in current communication coverage, the resulting impacts from the proposed project are quite minimal.

Based on the identified benefits of the proposed project, and pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15093, the County adopted a Statement of Overriding Considerations for the project's potential unavoidable adverse impacts to aesthetics.

Section 2 – Allowance for Modification and Expansion

The PEIR imposed a number of standard mitigation measures that were applicable to all PSEC sites. As noted previously, mitigation measures related to air quality, hydrology and water quality were intended to apply to all sites, regardless of location. Mitigation measures related to biological and cultural resources were intended to be more site and area specific, and included requirements for actions to be taken if a site were to change location or if additional sites not previously identified in the PEIR were proposed to be included as part of the overall PSEC project.

At the time of the PEIR's adoption, certain design details and a final location for a number of the sites had not been finalized. To provide for such a contingency, the PEIR prescribed mitigation measures to be implemented if a site or its supporting components (access roads, power alignments, etc.) were to be relocated to an area that had not been assessed and/or surveyed as part of the PEIR. This programmatic approach was adopted to allow modifications to project design without the need for recirculation of the PEIR. Specific measures prescribed in the PEIR required the County to determine that the impacts associated with the proposed modification/addition were consistent with the analysis and findings of the PEIR. Specific performance measures were adopted to identify the analysis necessary to make this determination. Those measures were contained in a number of mitigation measures applicable to the sites assessed in this addendum, as follows:

Biological Resources

- MM BR-1a** If a proposed site is located within a U.S. Fish and Wildlife Service (USFWS) designated Critical Habitat area for a federally listed species, but is located outside of an established Habitat Conservation Plan (HCP), then appropriate FESA consultation with the USFWS must be undertaken prior to site development. If suitable habitat for the species is present on or adjacent to the project, then focused surveys shall be undertaken to determine presence or absence of the listed species. This survey requirement may be avoided if the listed species' occupancy of the site is preemptively assumed.
- MM BR-1c** If any construction related to the proposed project, such as access roads, is anticipated to occur outside of the area surveyed for the June 3, 2008 Habitat Assessment Report, then additional habitat assessments shall be conducted by a qualified biologist prior to development to evaluate potential impacts. If these expanded surveys find that sensitive biological resources are present in the area to be impacted, then appropriate measures consistent with applicable laws and policies in effect at the time of the survey shall be undertaken to avoid or mitigate identified impacts. If the expanded surveys do not find sensitive biological resources in the area to be impacted, then development may then commence unimpeded within the parameters of applicable laws and policies governing such development.
- MM BR-5a** A consistency analysis shall be prepared for all sites governed by the Western Riverside Multiple Species Habitat Conservation Plan (WRMSHCP). This analysis may be presented as a master document that incorporates analysis for all of the sites rather than separate documents for each site. Regardless of the manner in which the analysis is presented, the development of each site must be found consistent with the WRMSHCP by the Regional Conservation Authority (RCA) and payment of the mandatory mitigation fee must be submitted prior to the site's development. Payment of the fee and a determination of consistency with the requirements of the WRMSHCP is intended to provide full mitigation under CEQA, National Environmental Policy Act (NEPA), California Endangered Species Act, and Federal Endangered Species Act for impacts to the species and habitats covered by the WRMSHCP.
- MM BR-5b** If a site is located within a Criteria Cell as defined in the WRMSHCP, then the County shall enter into a Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process with the Riverside County Environmental Planning Department (EPD) or the appropriate WRMSHCP participant. Once the HANS application is deemed complete, a HANS Criteria Determination Letter shall be issued. The application and letter must then be reviewed and accepted by the Regional Conservation Authority (RCA) prior to site development.
- MM BR-5i** If a site is proposed to be located on lands managed by an agency of the federal government, then development of the site must be reviewed by the agency prior to site development and found to be consistent with the agency's applicable resource management plan.

Cultural Resources

MM CR-1a In the event that ground-disturbing activities extend beyond the limits of a 300-foot buffer from the surveyed site, then additional archaeological studies must be completed to determine whether historical properties or significant archaeological resources will be affected by the proposed construction plans. Ground disturbing activities may consist of, but are not limited to trenching for electrical power, creation of access roads, or access road improvements. The extent of these additional archaeological studies would be determined based upon the nature of the proposed construction plans beyond a 300-foot radius of the surveyed location. If these expanded surveys find that sensitive properties or resources are present in the area to be impacted, then appropriate measures consistent with applicable laws and policies in effect at the time of the survey shall be undertaken to avoid or mitigate identified impacts. If the expanded surveys do not find sensitive properties or resources in the area to be impacted, then development may then commence unimpeded within the parameters of applicable laws and policies governing such development.

Since adoption of the PEIR in September 2008, it has been determined that the provision of adequate emergency services communication coverage to certain portions of the County would not be met without the construction of additional communication sites beyond that assessed in the PEIR. In addition, one site that had been evaluated in the PEIR had to be relocated due to access issues and communication coverage deficiencies. As such, the County undertook to implement the mitigation prescribed in the PEIR that was required in the event of site relocation or network expansion.

This addendum evaluates six new sites (Billy Goat, Box Canyon, Midland, Palen-McCoy, Road 62, and Snow Peak) that were not specifically evaluated in the PEIR. Each of these new sites share similar characteristics of all previously approved PSEC sites in that they possess the same vegetation, habitat and visual characteristics of other sites. Additionally, these sites will generally disturb and occupy the same amount of space as the previously approved PSEC sites. As per the PEIR, the PEIR mitigation measures relating to air quality and hydrology and water quality were generic in nature and were intended to be applied to all sites regardless of location. Therefore, further analysis for air quality and hydrology and water quality is not required for purposes of this addendum. For biological and cultural resources, the analysis for each site is presented individually below, and incorporates the findings from the biological and cultural resources studies required as per the PEIR mitigation measures outlined above.

Section 3 – Site Evaluations and Consistency with the PEIR

3.1 – Billy Goat Communication Site Addition

One of the areas within the County that was determined to be deficient in emergency services communication coverage was in the southwestern portion of the County east of Temecula, in the vicinity of the State Route (SR) 79 and SR-371 junction. This area is currently without adequate emergency services communication coverage. Even though the area is rural in nature, requests for emergency services are frequent. Both SR-79 and SR-371 are narrow and curvy roads and traffic accidents occur regularly. In addition, the area is at high risk for wildfire, and many homes and other properties are scattered throughout the hills. Emergency

responders working in this area currently do so without reliable communication coverage. Even with development of several other nearby PSEC communication sites (Lake Riverside and Red Mountain), communication coverage in this area would still be inadequate. Based on this deficiency, it was determined that an additional communication site would need to be constructed in the vicinity of the SR-70/SR-371 junction. The addition of the Billy Goat Communication Site, which is the subject of this addendum, is intended to supplement the coverage in this area and remedy the deficiency.

The Billy Goat Communication Site is located in the vicinity of the unincorporated community of Aguanga in Riverside County, approximately 1.75 miles north of the intersection of SR-79 and SR-371, 570 feet west of SR-371, and is located at the following physical address: 45552 Cahuilla Road, Aguanga, California 92536. The project site is located in Section 22 of Township 8 South, Range 1 East, as found on the U.S. Geological Survey (USGS) Aguanga, California, 7.5-minute topographic quadrangle. The site is located on a County-owned parcel, in rolling foothills. The surrounding area has been subdivided into numerous large and multi-acre lots. Several single-family residences are located within several hundred feet of the site. Commercial electric power is available adjacent to the site, as is an all-weather access road. The site has been subject to disturbance associated with grading a nearby home site. It is very similar to a number of other previously approved PSEC sites with regards to the setting, habitat type, and vegetative characteristics that are present. The Lake Riverside site, for example, lies approximately four miles to the northeast of the Billy Goat site and is also located in hilly, rolling terrain and is in chaparral sage scrub with numerous single family residences lying nearby. Exhibits are included within Appendix A.1 of this addendum that show the Billy Goat site's location and photographs of the site and surrounding area.

Since this additional proposed site was not assessed in the PEIR, the County has implemented the mitigation measures that were prescribed in the PEIR for new or relocated sites. Table 1, below, summarizes the PEIR mitigation measures that are relevant to the new Billy Goat Communication Site. The table also provides justification as to whether or not the mitigation measures listed above in Section 2 apply to this site.

Table 1: PEIR Mitigation Measures Applicable to the Billy Goat Communication Site

Mitigation Measure	Applicable to Billy Goat Communication Site?
Biological Resources	
BR-1a: Additional requirements for sites in USFWS-designated Critical Habitat.	No. The site is not located within Critical Habitat for any species. Further analysis in this regard is not required.
BR-1c: Requirement for additional biological resources surveys if new sites are proposed or if a site changes location.	Yes. The Billy Goat site is an all-new site that was not previously assessed for biological resources in the PEIR. A biological resources survey was completed and the findings are summarized below in Section 3.1.1.
BR-5a: Preparation of WRMSHCP Consistency Analysis for sites within the MSHCP plan area.	Yes. The site is located within the WRMSHCP plan area. A WRMSHCP Consistency Analysis was prepared and the findings are summarized below in Section 3.1.1.
BR-5b: Requirement for additional review for sites located within WRMSHCP Criteria Cells.	Yes. The site is located within a Criteria Cell. A Joint Project Review (JPR) process was completed for the

	site as per the WRMSHCP and the findings are summarized below in Section 3.1.1.
BR-5i: Federal jurisdictional agency review for sites on federal land.	No. The Billy Goat Communication Site is not located on lands administered by an agency of the federal government. Further analysis in this regard is not required.
Cultural Resources	
CR-1a: Requirement for additional cultural resources surveys if new sites are proposed or if a site changes location.	Yes. The Billy Goat site is an all-new site that was not previously assessed for cultural resources in the PEIR. A cultural resources survey was completed and the findings are summarized below in Section 3.1.2.

3.1.1 – Biological Resources (Billy Goat Communication Site Addition)

As per the relevant mitigation measures related to biological resources for this site, and noted above (MM BR-1c, MM BR-5a, and MM BR-5b), a habitat assessment and WRMSHCP Consistency Analysis was prepared and submitted to the RCA for review and approval. The Consistency Analysis and the RCA's Consistency Determination are attached to this addendum within Appendix B.1.

The RCA found that the proposed action at the proposed Billy Goat Communication Site was consistent with WRMSHCP requirements and that development of the proposed project would not prevent the County of Riverside from achieving the conservation goals of the WRMSHCP. No adverse environmental effects from project implementation were identified. WRMSHCP fees would be paid during the standard construction permitting process. Based on these findings, it can be determined that the proposed Billy Goat Communication Site is consistent with the findings contained in the PEIR, which determined that the project would not have a significant impact in regards to biological resources. As such, further action related to biological resources is not required.

3.1.2 – Cultural Resources (Billy Goat Communication Site Addition)

As per the mitigation measure (MM CR-1a), a records search and a pedestrian cultural resources survey was conducted for the proposed site. A report that outlines the results of these efforts is included within Appendix C.1 of this addendum. The results of the records search indicated that no previously recorded cultural resources are located within the project area, and three resources are known within one mile. However, those resources are located more than 0.5 miles from the project area and would not be affected by construction. During the pedestrian survey, no prehistoric archaeological resources were observed, and no historic-age sites were detected.

The results of the records search, the negative results for significant cultural resources during the pedestrian survey, and the disturbed nature of the soils within the project area render it unlikely that significant and intact subsurface resources would be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

3.1.3 – Determination of Findings (Billy Goat Communication Site Addition)

Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Billy Goat Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

3.2 – Box Canyon Communication Site Addition

Another area of the County that was determined to be deficient in emergency services communication coverage was in the south-central portion of the County east of the City of Indio. The specific area that was lacking coverage was a portion of the Mecca Hills and adjacent portions of the Coachella Valley. A particular area of concern was Box Canyon Road (SR-195). This roadway passes through the Mecca Hills through a narrow canyon that is difficult to reach with radio coverage. Box Canyon Road is a paved, two-lane roadway that sees a substantial amount of use by vehicles traveling between the agricultural areas of Mecca and I-10. The roadway is regularly used as a shortcut for persons traveling from I-10 to State Highways 86 and 111 in the Coachella and Imperial Valleys. Heavy truck traffic constitutes a substantial portion of the use on the roadway through the canyon. The roadway is narrow and curvy and traffic accidents are common. This area is currently without any emergency services communication coverage. Emergency responders working in this area currently do so without reliable communication coverage to summon backup or needed resources. Even with development of several other nearby PSEC communication sites (Mecca Landfill and Line), communication coverage in this area would still be inadequate. Based on

this deficiency, it was determined that an additional communication site would need to be constructed along the SR-195 corridor. The addition of the Box Canyon Communication Site, which is the subject of this addendum, is intended to supplement the coverage in this area and remedy the deficiency.

The Box Canyon Communication Site is located in the Mecca Hills, adjacent to SR-195. The site is approximately 10 miles east of the unincorporated community of Mecca and approximately five miles southeast of the Cactus City Rest Area on Interstate 10 (I-10). The project site is located in Section 26 of Township 6 South, Range 10 East, as found on the USGS Mortmar, California, 7.5-minute topographic quadrangle. The site is located on land that is managed by the Bureau of Land Management (BLM), in hilly and broken terrain. The surrounding area is rural in nature. Commercial electric power is not readily available, and the site would be powered by a 24/7 diesel-powered generator. An existing access road would be improved to reach the site. The site is very similar to a number of other previously approved PSEC sites with regards to the setting, habitat type, and vegetative characteristics that are present. The Cactus City site, for example, lies approximately five miles to the northwest of the Box Canyon site and is also located in hilly, broken terrain and is in creosote scrub habitat with a busy roadway nearby. Exhibits are included within Appendix A.2 of this addendum that show the Box Canyon site's location and photographs of the site and surrounding area.

Since this additional proposed site was not assessed in the PEIR, the County has implemented the mitigation measures that were prescribed in the PEIR for new or relocated sites. Table 2, below, summarizes the PEIR mitigation measures that are relevant to the new Box Canyon Communication Site. The table also provides justification as to whether or not the mitigation measures listed above in Section 2 apply to this site.

Table 2: PEIR Mitigation Measures Applicable to the Box Canyon Communication Site

Mitigation Measure	Applicable to Box Canyon Communication Site?
Biological Resources	
BR-1a: Additional requirements for sites in USFWS-designated Critical Habitat.	Yes. The site is located in USFWS-designated Critical Habitat for desert tortoise, a federally-listed threatened species. Section 7 consultation for this site was undertaken by the BLM. The results of the consultation are summarized below in Section 3.2.1.
BR-1c: Requirement for additional biological resources surveys if new sites are proposed or if a site changes location.	Yes. The Box Canyon site is an all-new site that was not previously assessed for biological resources in the PEIR. A biological resources survey was completed and the findings are summarized below in Section 3.2.1.
BR-5a: Preparation of WRMSHCP Consistency Analysis for sites within the MSHCP plan area.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5b: Requirement for additional review for sites located within WRMSHCP Criteria Cells.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5i: Federal jurisdictional agency review for sites on federal land.	Yes. The site is located on federal land managed by the BLM. An Environmental Assessment (EA) was prepared and circulated by the BLM and a Finding of No Significant Impact (FONSI) was made. The findings of the EA and the FONSI are summarized below in Section 3.2.1.

Cultural Resources	
CR-1a: Requirement for additional cultural resources surveys if new sites are proposed or if a site changes location.	Yes. The Box Canyon site is an all-new site that was not previously assessed for cultural resources in the PEIR. A cultural resources survey was completed and the findings are summarized below in Section 3.2.2.

3.2.1 – Biological Resources (Box Canyon Communication Site Addition)

As per MM BR-1a, an informal Section 7 consultation process as required under the federal Endangered Species Act (ESA) was undertaken by the BLM. The proposed project falls within the definition of actions covered by the Biological Opinion (BO) for Small Projects Affecting Desert Tortoise Habitat in Imperial, Inyo, Kern, Los Angeles, Riverside, and San Bernardino Counties (Small Projects BO; 1-8-97-F-17) and the BO for the California Desert Conservation Area Plan [Desert Tortoise] (6840 CA930(P)) (1-8-04-F-43R). Both of these BOs were issued by the USFWS and analyzed the potential impacts to the desert tortoise on BLM lands from minor construction projects, defined as projects impacting less than two acres. These BOs specifically covered the construction of communication facilities. As per the BO, mitigation measures are required to protect against inadvertent take of the species. The measures are specified within the EA that was prepared for the project and circulated by the BLM and attached to this addendum as Appendix D. Compliance with these measures will provide full mitigation for the project's potential impacts to desert tortoise. As such, further action related to this issue is not required.

As per MM BR-1c, a habitat assessment was prepared for the project area. The habitat assessment is attached to this addendum in Appendix B.2. Since the project site is not located within western Riverside County, it is thus not subject to the WRMSHCP and mitigation measures BR-5a and BR-5b do not apply. The habitat assessment determined that the site is located within designated Critical Habitat for desert tortoise, a federally-listed threatened species. However, the project is covered under the USFWS's Small Projects BOs (as discussed above), and impacts to the species are therefore considered less than significant, as mitigated. The assessment also found that the site contains no Waters of the U.S. or Waters of the State. No wildlife corridors, nursery sites, or other sensitive habitat areas were found on the site. Based on these findings, it can be determined that the proposed Box Canyon Communication Site is consistent with the findings contained in the PEIR, which determined that the project would not have a significant impact in regards to biological resources. As such, further action related to this issue is not required.

The site is located on federal land managed by the BLM. As per MM BR-5i, as well as relevant federal laws and regulations governing activities on federal lands, an EA was prepared for the project under NEPA. The EA is included with this addendum as Appendix D. The EA was circulated by the BLM per its regulations. Following circulation of the EA, the BLM issued a FONSI, which determined that the project would not result in an adverse impact to the environment. The BLM also found that the project was consistent with all BLM Resource Management Plans applicable to the project area. As such, further action related to this issue is not required.

3.2.2 – Cultural Resources (Box Canyon Communication Site Addition)

As per the mitigation measure (MM CR-1a), a records search and a pedestrian cultural resources survey was conducted for the proposed site. A report that outlines the results of

these efforts is included within Appendix C.2 of this addendum. The results of the records search indicated that no previously recorded cultural resources are located within the project area, and three resources are known within one mile. However, those resources are not located within the proposed impact area for the project, and would thus not be affected by construction. During the pedestrian survey, no previously unrecorded prehistoric archaeological resources were observed, and no historic-age sites were detected.

The results of the records search, the negative results for significant cultural resources during the pedestrian survey, and the disturbed nature of the soils within the project area render it unlikely that significant and intact subsurface resources would be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

3.2.3 – Determination of Findings (Box Canyon Communication Site Addition)

Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Box Canyon Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

3.3– Midland Communication Site Addition

Another area of the County that was determined to be deficient in emergency services communication coverage was in the eastern portion of the County, northwest of the City of

Blythe. This is a remote desert area, that despite its rural nature generates a substantial number of emergency service calls. The specific area that was lacking coverage was an expansive valley area between the Little Maria, McCoy, and Palen Mountains approximately 25 miles northwest of Blythe. There are no paved roads in the area, and recreationists use the area for outdoor activities, and there are also a number of active mines in the area. This area is currently without any emergency services communication coverage. Emergency responders working in this area currently do so without reliable communication coverage to summon backup or needed resources. Even with development of several other nearby PSEC communication sites (Black Jack and Wileys Well), communication coverage in this area would still be inadequate. Based on this deficiency, it was determined that an additional communication site would need to be constructed in this area. The addition of the Midland Communication Site, which is the subject of this addendum, is intended to supplement the coverage in this area and remedy the deficiency.

The Midland Communication Site is located in an unnamed valley between the Little Maria, McCoy, and Palen Mountains, approximately 16 miles north of the Wileys Well Rest Area on I-10. The project site is located in Section 11 of Township 4 South, Range 19 East, as found on the USGS Arlington Mine, California, 7.5-minute topographic quadrangle. The site is located on land that is managed by the BLM. The surrounding area is very remote and rural in nature. Commercial electric power is not readily available, and the site would be powered by a 24/7 diesel-powered generator. An existing access road (Palen Pass Road) lies immediately adjacent to the site. The site is very similar to a number of other previously approved PSEC sites with regards to the setting, habitat type, and vegetative characteristics that are present. The Black Jack site, for example, lies approximately 5.5 miles to the east of the Midland site and is also located on a sloping desert bajada adjacent to a desert roadway. Exhibits are included within Appendix A.3 of this addendum that show the Midland site's location and photographs of the site and surrounding area.

Since this additional proposed site was not assessed in the PEIR, the County has implemented the mitigation measures that were prescribed in the PEIR for new or relocated sites. Table 3, below, summarizes the PEIR mitigation measures that are relevant to the new Midland Communication Site. The table also provides justification as to whether or not the mitigation measures listed above in Section 2 apply to this site.

Table 3: PEIR Mitigation Measures Applicable to the Midland Communication Site

Mitigation Measure	Applicable to Midland Communication Site?
Biological Resources	
BR-1a: Additional requirements for sites in USFWS-designated Critical Habitat.	No. The site is not located within Critical Habitat for any species. Further analysis in this regard is not required.
BR-1c: Requirement for additional biological resources surveys if new sites are proposed or if a site changes location.	Yes. The Midland site is an all-new site that was not previously assessed for biological resources in the PEIR. A biological resources survey was completed and the findings are summarized below in Section 3.3.1.
BR-5a: Preparation of WRMSHCP Consistency Analysis for sites within the MSHCP plan area.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.

BR-5b: Requirement for additional review for sites located within WRMSHCP Criteria Cells.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5i: Federal jurisdictional agency review for sites on federal land.	Yes. The site is located on federal land managed by the BLM. An EA was prepared and circulated by the BLM and a FONSI was made. The findings of the EA and the FONSI are summarized below in Section 3.3.1.
Cultural Resources	
CR-1a: Requirement for additional cultural resources surveys if new sites are proposed or if a site changes location.	Yes. The Midland site is an all-new site that was not previously assessed for cultural resources in the PEIR. A cultural resources survey was completed and the findings are summarized below in Section 3.3.2.

3.3.1– Biological Resources (Midland Communication Site Addition)

As per MM BR-1c, a habitat assessment was prepared for the project area. The habitat assessment is attached to this addendum in Appendix B.3. Since the project site is not located within western Riverside County, it is thus not subject to the WRMSHCP and mitigation measures BR-5a and BR-5b do not apply. The habitat assessment determined that the site contains suitable habitat for desert tortoise, a federally-listed threatened species. However, the project is covered under the USFWS’s Small Projects BOs (as discussed previously in Section 3.2.1), and impacts to the species are therefore considered less than significant, as mitigated. The assessment also found that the site contains no Waters of the U.S. or Waters of the State. No wildlife corridors, nursery sites, or other sensitive habitat areas were found on the site. Based on these findings, it can be determined that the proposed Midland Communication Site is consistent with the findings contained in the PEIR, which determined that the project would not have a significant impact in regards to biological resources. As such, further action related to this issue is not required.

The site is located on federal land managed by the BLM. As per MM BR-5i, as well as relevant federal laws and regulations governing activities on federal lands, an EA was prepared for the project under NEPA. The EA is included with this addendum as Appendix D. The EA was circulated by the BLM per its regulations. Following circulation of the EA, the BLM issued a FONSI, which determined that the project would not result in an adverse impact to the environment. The BLM also found that the project was consistent with all BLM Resource Management Plans applicable to the project area. As such, further action related to this issue is not required.

3.3.2– Cultural Resources (Midland Communication Site Addition)

As per MM CR-1a, a records search and a pedestrian cultural resources survey was conducted for the proposed site. A report that outlines the results of these efforts is included within Appendix C.2 of this addendum. The results of the records search indicated that no previously recorded cultural resources are located within the project area or within one mile of the project area. During the pedestrian survey, no prehistoric archaeological resources were observed, and one historic-age resource was detected. This resource is found to the southwest of the proposed candidate, and was recorded as an historic-age isolated find consisting of four US Army C-ration cans. These cans are likely associated with the use of

this area for military exercises associated with the Desert Training Center/California-Arizona Maneuver Area (DTC/C-AMA). The Midland area and vicinity served as a military maneuver practice area to provide field training for the Allied invasion of North Africa during World War II.

In the case of most isolated cultural resources such as that found at the Midland site, the lack of artifact content and context and the absence of significant interpretive data cannot meet the minimal requirements of the National Register of Historic Places (NRHP) eligibility criteria. This renders the majority of all isolated resources ineligible for listing in the NRHP. It was determined that the resources detected at the Midland site could not meet the minimal requirements of the NRHP eligibility criteria. Thus, it was determined that the potential impact to the site was less than significant. The BLM concurred with this finding.

The results of the records search and the negative results for significant cultural resources during the pedestrian survey area render it unlikely that significant and intact subsurface resources would be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

3.3.3– Determination of Findings (Midland Communication Site Addition)

Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Midland Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

3.4 – Palen-McCoy Communication Site Addition

Another area of the County that was determined to be deficient in emergency services communication coverage was in the northeastern portion of the County, northwest of the City of Blythe. This is a remote desert area that, despite its rural nature, generates a substantial number of emergency service calls. The specific area that was lacking coverage was an expansive valley and desert mountain area between the Granite, Little Maria, and Palen Mountains approximately 32 miles northwest of Blythe. There are no paved roads in the area, and recreationists use the area for outdoor activities, and there are also a number of active mines in the area. This area is currently without any emergency services communication coverage. Emergency responders working in this area currently do so without reliable communication coverage to summon backup or needed resources. Even with development of several other nearby PSEC communication sites (Midland and Rice), communication coverage in this area would still be inadequate. Based on this deficiency, it was determined that an additional communication site would need to be constructed in this area. The addition of the Palen-McCoy Communication Site, which is the subject of this addendum, is intended to supplement the coverage in this area and remedy the deficiency.

The Palen-McCoy Communication Site is located approximately two miles east of Palen Pass in a gap between the Palen mountains and the Little Maria Mountains, approximately 14 miles southeast of the SR-62/SR-177 junction. The project site is located in Section 7 of Township 3 South, Range 19 East, as found on the USGS Palen Pass, California, 7.5-minute topographic quadrangle. The site is located on land that is managed by the BLM. The surrounding area is very remote and rural in nature. Commercial electric power is not readily available, and the site would be powered by a 24/7 diesel-powered generator. An existing access road (Palen Pass Road) lies immediately adjacent to the site. The site is very similar to a number of other previously approved PSEC sites with regards to the setting, habitat type, and vegetative characteristics that are present. The Black Jack site, for example, lies approximately 11.5 miles to the east of the Palen-McCoy site and is also located on a sloping desert bajada adjacent to a desert roadway. Exhibits are included within Appendix A.4 of this addendum that show the Palen-McCoy site's location and photographs of the site and surrounding area.

Since this additional proposed site was not assessed in the PEIR, the County has implemented the mitigation measures that were prescribed in the PEIR for new or relocated sites. Table 4, below, summarizes the PEIR mitigation measures that are relevant to the new Palen-McCoy Communication Site. The table also provides justification as to whether or not the mitigation measures listed above in Section 2 apply to this site.

Table 4: PEIR Mitigation Measures Applicable to the Palen-McCoy Communication Site

Mitigation Measure	Applicable to Palen-McCoy Communication Site?
Biological Resources	
BR-1a: Additional requirements for sites in USFWS-designated Critical Habitat.	No. The site is not located within Critical Habitat for any species. Further analysis in this regard is not required.
BR-1c: Requirement for additional biological resources surveys if new sites are proposed or if a site changes location.	Yes. The Palen-McCoy site is an all-new site that was not previously assessed for biological resources in the PEIR. A biological resources survey was completed and the findings are summarized below in Section 3.4.1.
BR-5a: Preparation of WRMSHCP Consistency	No. The site is not located within the WRMSHCP plan

Table 4: PEIR Mitigation Measures Applicable to the Palen-McCoy Communication Site

Mitigation Measure	Applicable to Palen-McCoy Communication Site?
Analysis for sites within the MSHCP plan area.	area. Further analysis in this regard is not required.
BR-5b: Requirement for additional review for sites located within WRMSHCP Criteria Cells.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5i: Federal jurisdictional agency review for sites on federal land.	Yes. The site is located on federal land managed by the BLM. An EA was prepared and circulated by the BLM and a FONSI was made. The findings of the EA and the FONSI are summarized below in Section 3.4.1.
Cultural Resources	
CR-1a: Requirement for additional cultural resources surveys if new sites are proposed or if a site changes location.	Yes. The Palen-McCoy site is an all-new site that was not previously assessed for cultural resources in the PEIR. A cultural resources survey was completed and the findings are summarized below in Section 3.4.2.

3.4.1 – Biological Resources (Palen-McCoy Communication Site Addition)

As per MM BR-1c, a habitat assessment was prepared for the project area. The habitat assessment is attached to this addendum in Appendix B.4. Since the project site is not located within western Riverside County, it is thus not subject to the WRMSHCP and mitigation measures BR-5a and BR-5b do not apply. The habitat assessment determined that the site contains suitable habitat for desert tortoise, a federally-listed threatened species. However, the project is covered under the USFWS's Small Projects BOs (as discussed previously in Section 3.2.1), and impacts to the species are therefore considered less than significant, as mitigated. The assessment also found that the site contains no Waters of the U.S. or Waters of the State. No wildlife corridors, nursery sites, or other sensitive habitat areas were found on the site. Based on these findings, it can be determined that the proposed Midland Communication Site is consistent with the findings contained in the PEIR, which determined that the project would not have a significant impact in regards to biological resources. As such, further action related to this issue is not required.

The site is located on federal land managed by the BLM. As per MM BR-5i, as well as relevant federal laws and regulations governing activities on federal lands, an EA was prepared for the project under NEPA. The EA is included with this addendum as Appendix D. The EA was circulated by the BLM per its regulations. Following circulation of the EA, the BLM issued a FONSI, which determined that the project would not result in an adverse impact to the environment. The BLM also found that the project was consistent with all BLM Resource Management Plans applicable to the project area. As such, further action related to this issue is not required.

3.4.2 – Cultural Resources (Palen-McCoy Communication Site Addition)

As per MM CR-1a, a records search and a pedestrian cultural resources survey was conducted for the proposed site. A report that outlines the results of these efforts is included within Appendix C.2 of this addendum. The results of the records search indicated that no previously recorded cultural resources are located within the project area or within one mile of the project area. During the pedestrian survey, no prehistoric archaeological resources were observed, and one historic-age resource was detected. This resource is found to the north

and northwest of the proposed candidate, and was recorded as an historic age isolated find consisting of at least four fragmented Coca-Cola bottles and three US Army C-ration cans. This refuse is likely associated with the use of this area for military exercises associated with the DTC/C-AMA.

In the case of most isolated cultural resources such as that found at the Palen-McCoy site, the lack of artifact content and context and the absence of significant interpretive data cannot meet the minimal requirements of the NRHP eligibility criteria. This renders the majority of all isolated resources ineligible for listing in the NRHP. It was determined that the resources detected at the Palen-McCoy site could not meet the minimal requirements of the NRHP eligibility criteria. Thus, it was determined that the potential impact to the site was less than significant. The BLM concurred with this finding.

The results of the records search and the negative results for significant cultural resources during the pedestrian survey area render it unlikely that significant and intact subsurface resources would be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

3.4.3 – Determination of Findings (Palen-McCoy Communication Site Addition)

Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Palen-McCoy Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

3.5 – Road 62 Communication Site Addition

Another area of the County that was determined to be deficient in emergency services communication coverage is in the northeastern portion of the County in the vicinity of the SR-62/SR-177 junction. Both of these roadways are heavily travelled, especially on weekends and during holiday periods when residents of the coastal and inland regions travel to the Colorado River for recreation. This area is currently without any emergency services communication coverage. Emergency responders working in this area currently do so without reliable communication coverage to summon backup or needed resources. Even with development of several other nearby PSEC communication sites (Road 177 and Rice), communication coverage in this area would still be inadequate. Based on this deficiency, it was determined that an additional communication site would need to be constructed in this area. The addition of the Road 62 Communication Site, which is the subject of this addendum, is intended to supplement the coverage in this area and remedy the deficiency.

The Road 62 Communication Site is at the junction of SR-62 (Twentynine Palms Highway) and SR-177 (Desert Center-Rice Road). This junction is approximately 52 miles east of Twentynine Palms, 27 miles north of Desert Center, and 59 miles west of Parker, Arizona. The project site is located in Section 32 of Township 1 South, Range 17 East, as found on the USGS Granite Pass, California, 7.5-minute topographic quadrangle. The site is located on land that is managed by the BLM. The surrounding area is very remote and rural in nature. Commercial electric power is not readily available, and the site would be powered by a 24/7 diesel-powered generator. An existing access road (SR-62) lies immediately adjacent to the site. The site is very similar to a number of other previously approved PSEC sites with regards to the setting, habitat type, and vegetative characteristics that are present. The Road 177 site, for example, lies approximately 11.5 miles to the south of the Road 62 site and is also located on a relatively flat creosote scrub-covered valley floor adjacent to a state highway. Exhibits are included within Appendix A.5 of this addendum that show the site's location and photographs of the Road 62 site and surrounding area.

Since this additional proposed site was not assessed in the PEIR, the County has implemented the mitigation measures that were prescribed in the PEIR for new or relocated sites. Table 5, below, summarizes the PEIR mitigation measures that are relevant to the new Road 62 Communication Site. The table also provides justification as to whether or not the mitigation measures listed above in Section 2 apply to this site.

Table 5: PEIR Mitigation Measures Applicable to the Road 62 Communication Site

Mitigation Measure	Applicable to Road 62 Communication Site?
Biological Resources	
BR-1a: Additional requirements for sites in USFWS-designated Critical Habitat.	No. The site is not located within Critical Habitat for any species. Further analysis in this regard is not required.
BR-1c: Requirement for additional biological resources surveys if new sites are proposed or if a site changes location.	Yes. The Road 62 site is an all-new site that was not previously assessed for biological resources in the PEIR. A biological resources survey was completed

Table 5: PEIR Mitigation Measures Applicable to the Road 62 Communication Site

Mitigation Measure	Applicable to Road 62 Communication Site?
	and the findings are summarized below in Section 3.5.1.
BR-5a: Preparation of WRMSHCP Consistency Analysis for sites within the MSHCP plan area.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5b: Requirement for additional review for sites located within WRMSHCP Criteria Cells.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5i: Federal jurisdictional agency review for sites on federal land.	Yes. The site is located on federal land managed by the BLM. An EA was prepared and circulated by the BLM and a FONSI was made. The findings of the EA and the FONSI are summarized below in Section 3.5.1.
Cultural Resources	
CR-1a: Requirement for additional cultural resources surveys if new sites are proposed or if a site changes location.	Yes. The Road 62 site is an all-new site that was not previously assessed for cultural resources in the PEIR. A cultural resources survey was completed and the findings are summarized below in Section 3.5.2.

3.5.1 – Biological Resources (Road 62 Communication Site Addition)

As per MM BR-1c, a habitat assessment was prepared for the project area. The habitat assessment is attached to this addendum in Appendix B.5. Since the project site is not located within western Riverside County, it is thus not subject to the WRMSHCP and mitigation measures BR-5a and BR-5b do not apply. The habitat assessment determined that the site contains suitable habitat for desert tortoise, a federally-listed threatened species. However, the project is covered under the USFWS's Small Projects BOs (as discussed previously in Section 3.2.1), and impacts to the species are therefore considered less than significant, as mitigated. The assessment also found that the site contains no Waters of the U.S. or Waters of the State. No wildlife corridors, nursery sites, or other sensitive habitat areas were found on the site. Based on these findings, it can be determined that the proposed Midland Communication Site is consistent with the findings contained in the PEIR, which determined that the project would not have a significant impact in regards to biological resources. As such, further action related to this issue is not required.

The site is located on federal land managed by the BLM. As per MM BR-5i, as well as relevant federal laws and regulations governing activities on federal lands, an EA was prepared for the project under NEPA. The EA is included with this addendum as Appendix D. The EA was circulated by the BLM per its regulations. Following circulation of the EA, the BLM issued a FONSI, which determined that the project would not result in an adverse impact to the environment. The BLM also found that the project was consistent with all BLM Resource Management Plans applicable to the project area. As such, further action related to this issue is not required.

3.5.2 – Cultural Resources (Road 62 Communication Site Addition)

As per MM CR-1a, a records search and a pedestrian cultural resources survey was conducted for the proposed site. A report that outlines the results of these efforts is included within Appendix C.2 of this addendum. The results of the records search indicated that no

previously recorded cultural resources are located within the project area or within one mile of the project area. During the pedestrian survey, no prehistoric archaeological resources were observed, and no historic-age resources were detected.

The results of the records search and the negative results for significant cultural resources during the pedestrian survey area render it unlikely that significant and intact subsurface resources would be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

3.5.3 – Determination of Findings (Road 62 Communication Site Addition)

Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Road 62 Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

3.6 – Snow Peak Communication Site Addition

Another area that was determined to be deficient in emergency services communication coverage was in the north-central part of the County in the northern portions of the San Jacinto Mountains. This area is currently without adequate emergency services communication coverage. Even though several other communication sites are located in this area (Morongo and Ranger Peak), terrain shadowing and other features associated with the area's rugged

topography make coverage in some areas difficult to achieve. The northern San Jacinto Mountains are particularly fire-prone, and SR-243 is a curvy mountain road that requires regular emergency response calls. Numerous other roads in this portion of the San Jacinto Mountains lead to private inholdings within the San Bernardino National Forest (SBNF), and several hundred homes and other properties are located amongst the hilltops and canyons of this area. Emergency responders working in this area currently do so without reliable communication coverage. Even with development of several other nearby PSEC communication sites (Morongo and Ranger Peak), communication coverage in this area would still be inadequate. Based on this deficiency, it was determined that an additional communication site would need to be constructed at a high elevation to provide coverage into the northern part of the San Jacinto Mountains. The addition of the Snow Peak Communication Site, which is the subject of this addendum, is intended to supplement the coverage in this area and remedy the deficiency.

The Snow Peak Communication Site is located in the southern San Bernardino Mountains approximately 8.5 miles northeast of the City of Banning. The site is located at approximately 7,800 feet in elevation and provides an exceptional point from which to provide communication coverage to areas to the south. The site is located in San Bernardino County approximately 1,200 feet north of the San Bernardino-Riverside County line. Snow Peak has been operated as a communication complex for several decades and is located upon a privately-owned inholding within the SBNF, within Section 31, Township 1 South, Range 2 East on the USGS San Gorgonio Mountain, California, 7.5-minute topographic quadrangle. A number of communication towers, equipment shelters, and associated facilities are located within the communication site complex. The County would lease a portion of the complex and construct a new tower and equipment shelter for its use. Commercial electric power is available at the site, and the site is seasonally accessible via a dirt road from Banning Canyon. A helicopter pad is located within the compound to facilitate visits to the site during winter. The site has been subject to disturbance associated with the construction and operation of the other communication facilities in the immediate vicinity. The site is very similar to a number of other previously approved PSEC sites with regards to the setting, habitat type, and vegetative characteristics that are present. The Santa Rosa site in the Santa Rosa Mountains, for example, is located amongst a number of other communication towers atop a high, conifer-covered mountain peak. Exhibits are included within Appendix A.6 of this addendum that show the Snow Peak site's location and photographs of the site and surrounding area.

Since this additional proposed site was not assessed in the PEIR, the County has implemented the mitigation measures that were prescribed in the PEIR for new or relocated sites. Table 6, below, summarizes the PEIR mitigation measures that are relevant to the new Snow Peak Communication Site. The table also provides justification as to whether or not the mitigation measures listed above in Section 2 apply to this site.

Table 6: PEIR Mitigation Measures Applicable to the Snow Peak Communication Site

Mitigation Measure	Applicable to Snow Peak Communication Site?
Biological Resources	
BR-1a: Additional requirements for sites in USFWS-designated Critical Habitat.	No. The site is not located within Critical Habitat for any species. Further analysis in this regard is not required.
BR-1c: Requirement for additional biological resources surveys if new sites are proposed or if	Yes. The Snow Peak site is an all-new site that was not previously assessed for biological resources in the

a site changes location.	PEIR. A biological resources survey was completed and the findings are summarized below in Section 3.6.1.
BR-5a: Preparation of WRMSHCP Consistency Analysis for sites within the MSHCP plan area.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5b: Requirement for additional review for sites located within WRMSHCP Criteria Cells.	No. The site is not located within the WRMSHCP plan area. Further analysis in this regard is not required.
BR-5i: Federal jurisdictional agency review for sites on federal land.	No. The Snow Peak Communication Site is not located on lands administered by an agency of the federal government. Further analysis in this regard is not required.
Cultural Resources	
CR-1a: Requirement for additional cultural resources surveys if new sites are proposed or if a site changes location.	Yes. The Snow Peak site is an all-new site that was not previously assessed for cultural resources in the PEIR. A cultural resources survey was completed and the findings are summarized below in Section 3.6.2.

3.6.1 – Biological Resources (Snow Peak Communication Site Addition)

As per the relevant mitigation measures related to biological resources for this site, and noted above (MM BR-1c), a habitat assessment was prepared for the project area. The habitat assessment is attached to this addendum in Appendix B.6. Since the project site is not located within western Riverside County, it is thus not subject to the WRMSHCP and mitigation measures BR-5a and BR-5b do not apply.

The habitat assessment determined that the site is not located within the designate Critical Habitat for any federally-listed species. The assessment also found that the site contains no suitable habitat for any federally-listed, state-listed, or otherwise sensitive species. No Waters of the U.S. or Waters of the State were found to be located on the site. No wildlife corridors, nursery sites, or other sensitive habitat areas were found on the site. Based on these findings, it can be determined that the proposed Snow Peak Communication Site is consistent with the findings contained in the PEIR, which determined that the project would not have a significant impact in regards to biological resources. As such, further action related to biological resources is not required.

3.6.2 – Cultural Resources (Snow Peak Communication Site Addition)

As per the mitigation measure (MM CR-1a), a records search and a pedestrian cultural resources survey was conducted for the proposed site. A report that outlines the results of these efforts is included within Appendix C.3 of this addendum. The results of the records search indicated that no previously recorded cultural resources are located within the project area or within one mile of the project area. During the pedestrian survey, no prehistoric archaeological resources were observed, and no historic-age sites were detected.

The results of the records search, the negative results for significant cultural resources during the pedestrian survey, and the disturbed nature of the soils within the project area render it unlikely that significant and intact subsurface resources would be encountered during project implementation. Therefore, the project area appears to exhibit low sensitivity for significant cultural resources. As such, further action related to cultural resources is not required.

3.6.3 – Determination of Findings (Snow Peak Communication Site Addition)

Based on the analysis contained in the above assessment, the County finds that the impacts of the proposed Snow Peak Communication Site are consistent with the analysis and findings contained in the PEIR. The proposed project meets the criteria established in Public Resources Code Sections 15162 and 15164 of the CEQA Guidelines for an addendum to an EIR. Based on substantial evidence in the light of the whole record, it is determined that:

- 1) No substantial changes are proposed which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 2) No substantial changes occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the PEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- 3) There is no new information of substantial importance, which was not shown or could not have been known with the exercise of reasonable diligence at the time the PEIR was certified as complete that shows that:
 - a. The project will have one or more significant effects not discussed in the PEIR.
 - b. Mitigation measures or alternatives previously found not to be feasible in the PEIR would in fact be feasible, and would substantially reduce one or more significant effects of the project; and
 - c. Mitigation measures or alternatives which are considerably different from those analyzed in the PEIR would substantially reduce one or more significant effects on the environment.

Based on the discussion provided above, no subsequent changes are proposed or would occur that necessitate the preparation of a subsequent EIR or other applicable CEQA document.

Appendix A – Communication Site Exhibits

- A.1 – Billy Goat Communication Site
- A.2 – Box Canyon Communication Site
- A.3 – Midland Communication Site
- A.4 – Palen-McCoy Communication Site
- A.5 – Road 62 Communication Site
- A.6 – Snow Peak Communication Site

All appendices are included on CD in the back inside cover of this addendum

Appendix B – Biological Resources Assessments

- B.1 – Billy Goat Communication Site
- B.2 – Box Canyon Communication Site
- B.3 – Midland Communication Site
- B.4 – Palen-McCoy Communication Site
- B.5 – Road 62 Communication Site
- B.6 – Snow Peak Communication Site

All appendices are included on CD in the back inside cover of this addendum

Appendix C – Cultural Resources Assessments

C.1 – Billy Goat Communication Site

C.2 – Box Canyon, Midland, Palen-McCoy, and Road 62 Communication Site

C.3 – Snow Peak Communication Site

All appendices are included on CD in the back inside cover of this addendum

Appendix D – BLM Environmental Assessment

Box Canyon Communication Site
Midland Communication Site
Palen-McCoy Communication Site
Road 62 Communication Site

All appendices are included on CD in the back inside cover of this addendum