

# **DIGITAL 299 BROADBAND PROJECT**

## **Addendum to Final Environmental Assessment and Initial Study/Mitigated Negative Declaration**

SCH # 2022010017

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Appendix A Initial Study

## **1.0 INTRODUCTION**

### **1.1. Background**

The California Public Utilities Commission (CPUC) approved a California Advanced Services Fund (CASF) infrastructure grant application for Inyo Networks, Inc. (Inyo) in March 2017, through Resolution T-17548. In September 2020, Inyo sent a letter to the Communications Division terminating the grant that was approved in the Resolution. Subsequently, Vero Fiber Networks, LLC (Vero) took over the Digital 299 Fiber Optic Broadband Project ("project") without seeking CASF funding. The Commission prepared a Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the project (SCH#2022010017) pursuant to the California Environmental Quality Act (CEQA) Guidelines. The Draft IS/MND also included a Draft Environmental Assessment (Draft EA) prepared pursuant to the National Environmental Policy Act for use in permitting and project approval by federal agencies. The joint Draft EA/ISMND was circulated through the State Clearinghouse of the Office of Planning and Research for a 30-day public comment period ending in February 2022. The CPUC addressed over 60 comments from the public and state and federal agencies and finalized the document in October 2022.

On December 15, 2022, the CPUC approved Resolution T-17766, which adopted the Final EA/ISMND in compliance with CEQA and approved the issuance of a Notice to Proceed for the Digital 299 Broadband Project.

The approved environmental documents analyzed installation of approximately 300 miles of new conduit and fiber optic cables to provide internet to unserved or underserved communities in Humboldt, Trinity, and Shasta counties. The project alignment generally follows California State Route 299, with segments diverging from the highway to follow city and county roads. The project is split into two phases: phase one would include installation of underground fiber optic cables along existing roads and rights-of-way (ROWs), and up to five prefabricated in-line amplifier (ILA) buildings to support signal regeneration, distribution, and interconnect, and phase two would include aerial spurs to connect nearby communities and direct connection to public buildings such as schools and hospitals and connections to customers in the Lewiston area (referred to as the "last-mile").

Vero submitted documentation to the CPUC in April 2023 describing a modification to the project that would involve altering the location of the eastern terminus of the project in Cottonwood, California. This Addendum to the Final EA/ISMND (Addendum) has been prepared to evaluate the potential impacts of this project modification ("Proposed Addition"). Each federal agency issued a NEPA decision which evaluated the portion of the proposed Project which crossed their jurisdiction. As the Proposed Addition does not cross any federal jurisdiction, the CPUC has sole authority to adopt this addendum in compliance with CEQA.

### **1.2. California Environmental Quality Act Compliance**

This document has been prepared in compliance with the CEQA. CEQA Guidelines §15164 provides:

- a) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- b) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

CEQA Guidelines §15162 identifies the conditions that trigger the need to prepare a subsequent Environmental Impact Report (EIR) or negative declaration:

*“When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in light of the whole record that:*

- 1) Substantial changes are proposed in the project which will require major revisions of the previous...negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous...negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant impacts; or*
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous...negative declaration was adopted, shows any of the following:*
  - a. The project will have one or more significant effects not discussed in the previous...negative declaration;*
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would be substantially reduce one of more significant effects on the environment, but the project proponents declined to adopt the mitigation measure or alternative.”*

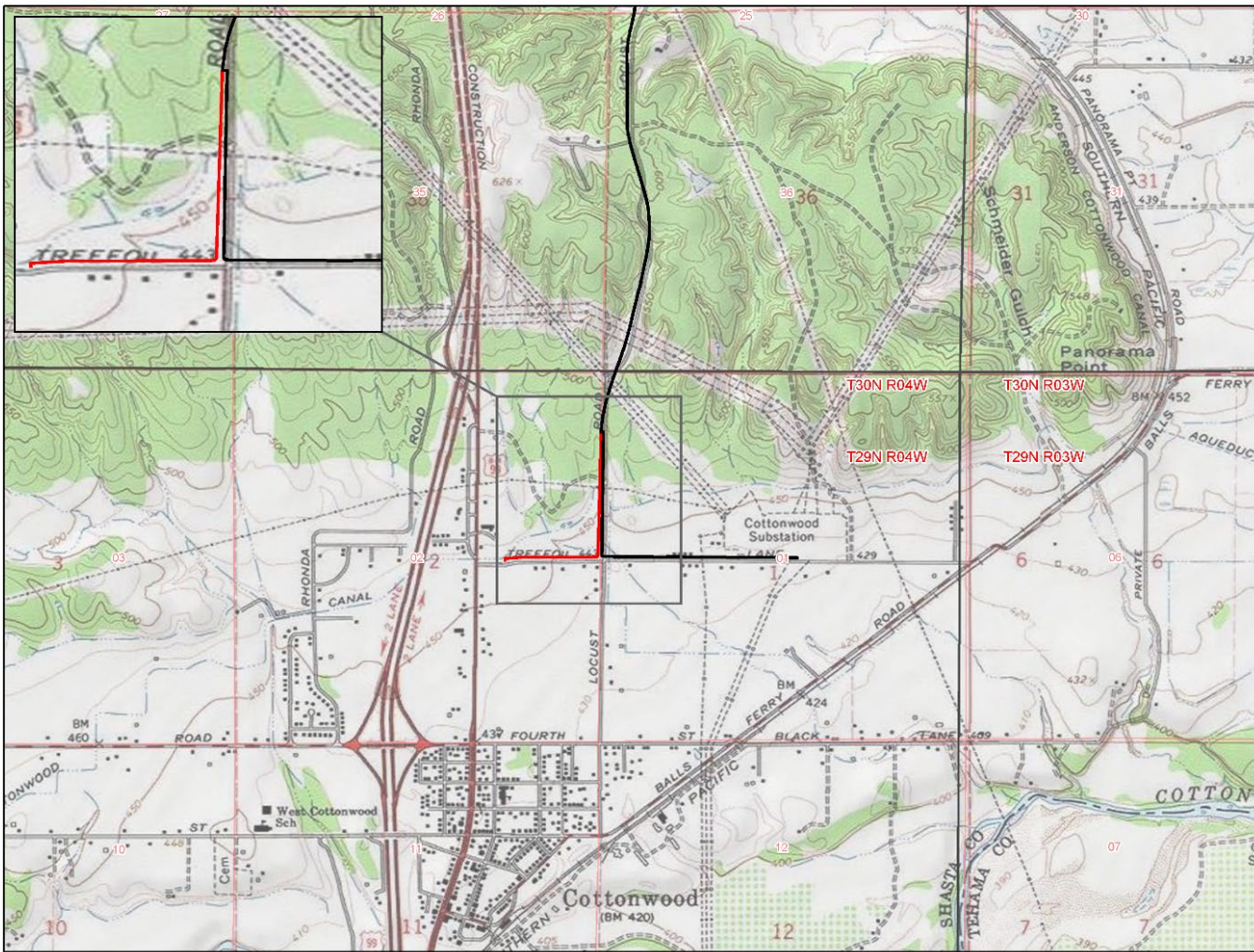
The purpose of this Addendum is to address minor additions to the project. As described in the Addendum, the proposed project modification is not a substantial change to the project and would not result in any new significant environmental impacts or any substantial increases in the severity of previously identified impacts. The modifications do not otherwise trigger the need to prepare a subsequent EIR or negative declaration pursuant to CEQA Guidelines §15162. Therefore, the CPUC has determined that a subsequent negative declaration is not required and an Addendum to the EA/ISMND is the appropriate level of CEQA review to address the proposed changes to the project. The analysis in the Addendum provides the basis for this conclusion.

## **2.0 DESCRIPTION OF PROJECT MODIFICATION**

### **2.1. Alignment Change**



*Section 2.21 Project Location and Areas of Disturbance* of the EA/ISMND describes the project’s action area across Humboldt, Trinity, and Shasta counties. At the eastern end of the project, the EA/ISMND describes the primary route following Locust Road to Trefoil Lane, terminating on Trefoil Lane northeast of Cottonwood. The original terminus point is located approximately 2,700 feet east of the intersection of Trefoil Lane and Locust Road. After approval of the EA/ISMND, Vero determined the actual location of this connection point would need to be approximately 1,400 feet west of the intersection of Trefoil Lane and Locust Road. Because this terminal point is where Vero will connect the middle mile to other networks across the state, it is essential to the project that Vero is able to connect to this point.

The location of the Proposed Addition is shown in **Figure 2-1**. The originally proposed alignment that heads east on Trefoil Lane (shown in black on **Figure 2-1**) would be considered an alternate route, though it is not expected to be constructed.

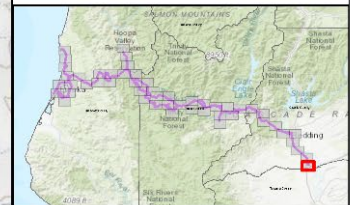


**Digital 299 Broadband Project**  
**Proposed West Trefoil Lane Alignment**  
**Cottonwood, CA**

**Legend**

-  Approved Alignment
-  Proposed Alignment

**Figure 2-1.**



0 1,000 2,000  
 Feet



 **Transcon environmental** | **Planners & Scientists**

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## 2.2. Disturbance

Along the whole alignment, Vero has requested permits for a 10-foot ROW for the permanent occupation of conduit and vaults; construction of the facilities would temporarily disturb up to a 25-foot-wide corridor. *Section 2.2.21* of the EA/ISMND describes the maximum acreages of temporary disturbances (construction corridor and staging areas) and permanent disturbances (vaults and ILA buildings).

For the purposes of this document, the private jurisdiction covers land under county and city jurisdiction. Laydown areas and ILA buildings are not planned as a part of the Proposed Addition, so the associated temporary and permanent disturbances are not considered in the table below. **Table 1** shows the acreages for temporary disturbances and permanent disturbances associated with the Proposed Addition. The maximum temporary disturbance on private lands would increase from 385.5 acres to 386.3 acres, and the maximum permanent disturbance would increase from approximately 4,544 square feet to 4,576 square feet.

<b>TABLE 1 TEMPORARY AND PERMANENT DISTURBANCE ON PRIVATE LANDS</b>			
<b>Jurisdiction</b>	<b>Mileage</b>	<b>Temporary Disturbance Conduit Placement (acres)<sup>a</sup></b>	<b>Permanent Disturbance Approx. Vaults (sq. feet)<sup>b</sup></b>
Private	142.0	385.5	4,544
Proposed Addition	0.27	0.8	32
<b>Total</b>	<b>142.27</b>	<b>386.3</b>	<b>4,576</b>

<sup>a</sup> Equals crossing mileage x 25-foot-wide corridor  
<sup>b</sup> Combined acreage of surface disturbance (48-inch by 48-inch vault lids each) for approximately one vault per 0.5 mile

## 2.3. Construction Schedule

*Section 2.2.2.4 Construction Operations* of the EA/ISMND describes the construction schedule, equipment, best management practices (BMPs), fiber optic cable marker posts, subsurface warning tape, and traffic control for the project. The middle-mile phase of the project, of which the Proposed Addition is a part, is estimated at up to 36 months with construction pacing between 500 feet and 2 miles per day, depending on the construction method and terrain. Therefore, the Proposed Addition of 1,400 feet will have a negligible effect on the construction schedule of the project.

## 2.4. Permits and Approvals

Permits and approvals that may be required for the approved project are described in Table 1 of the EA/ISMND. Shasta County will review the engineering plans for the Proposed Addition and consider issuing an amendment to the encroachment permit issued for the original segments of the project under the County's jurisdiction. No new permits or approvals are anticipated as a result of the proposed modification.

## 3.0 ENVIRONMENTAL ANALYSIS

The purpose of this analysis is to evaluate the resource categories in terms of any project changes or new information of substantial importance that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect). The questions posed in the checklist come from Appendix A of the Final EA/ISMND. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is



no change in the condition or status of the impact since it was analyzed and addressed with resource protection measures in the Final IS/MND.

### 3.1. Aesthetics

<b>TABLE 2 AESTHETICS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>I. Aesthetics, Light, and Glare</b> <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	No impact	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	No impact	No	No	None
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	VR-1, VR-2 (Not applicable to Proposed Addition)
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact	No	No	VR-1, VR-2 (Not applicable to Proposed Addition)

Section I of Appendix A of the Final EA/ISMND evaluated the potential visual impacts from the installation of the aboveground and underground project facilities and determined the project would have a less than significant impact on aesthetics. The additional 1,400 feet would be located within the already developed transportation corridor on Trefoil Lane and would consequently cause no long-term change to the visual character of the surrounding landscape. The Proposed Addition does not include new aboveground facilities such as ILA buildings or aerial lines and would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts upon the environment.

### 3.2. Agriculture and Forestry Resources

<b>TABLE 3 AGRICULTURE AND FORESTRY RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>II. Agricultural and Forest Resources</b> <i>Would the project:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	No impact	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact	No	No	None
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No impact	No	No	None

Section II of Appendix A of the EA/ISMND determined that the project would have no impact on agriculture and forestry resources. The project would remain within established utility or transportation corridors and/or on existing structures and would not result in a loss or conversion of farmland and forest land to non-farmland and non-forest land use. Similar to the whole project, the Proposed Addition would not intersect areas zoned as farmland in Shasta County. Therefore, the Proposed Addition would not result in new impacts to agricultural and forestry resources.

### 3.3. Air Quality

<b>TABLE 4 AIR QUALITY</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>III. Air Quality</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact	No	No	AQ-1, AQ-2, AQ-3
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	Less than significant impact	No	No	AQ-1
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact	No	No	None
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No impact	No	No	None

Section III of Appendix A of the EA/ISMND determined that the project would have less than significant impact on air quality. Installation of an additional 1,400 feet of underground conduit would result in a minor increase in air quality due to the negligible increase in total workdays and area disturbed. The work would increase the maximum temporary disturbance on private lands from 385.5 to 386.3 acres and would increase the number of workdays by up to four days. All work would still occur within the three-year construction phase of the whole project. Although the construction would be nearby private residences, the residences are not considered sensitive receptors due to the short-term effect. The project modification would not cause any new significant impacts or increase the severity of previously identified air quality impacts with implementation of the applicant proposed measures (APMs) identified in the Final EA/ISMND.

### 3.4. Biological Resources

<b>TABLE 5 BIOLOGICAL RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>IV. Biological Resources</b> <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or United States Fish and Wildlife Service?	Less than significant with Mitigation Incorporated	No	No	BIO 3-20 (BIO 10-12, BIO 18-20 are not applicable to Proposed Addition due to habitat suitability)
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS?	Less than significant with Mitigation Incorporated	No	No	BIO-3, BIO-5, BIO-6, BIO-8
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant impact	No	No	BIO-5
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	Less than significant impact	No	No	None
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No impact	No	No	None
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural	No impact	No	No	None

<b>TABLE 5 BIOLOGICAL RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?				

Section IV of Appendix A of the Final EA/ISMND determined that the project would have less than significant impact on biological resources with implementation of the identified APMs and mitigation measures. Transcon Environmental, Inc. (Transcon) biologists analyzed the whole project alignment and a 0.25-mile buffer, known as the Action Area, for biological resources that have the potential to be affected directly or indirectly by the project. Transcon biologists also surveyed a 50-foot-wide buffer on either side of the alignment along a majority of the route, known as the survey area, for potential biological resources (Transcon 2022).

As the project survey area did not extend the length of the Proposed Addition, Transcon completed an additional biological survey in April 2023 along the 1,400-foot-long Proposed Addition and a 25-foot buffer on either side, as was feasible due to the private residences. No special-status species, wetlands, or riparian areas were identified within the Proposed Addition alignment or buffer area, which is along a residential road. The area was heavily disturbed, and the vegetated portions of the Action Area contained ruderal grasses. The project modification would not result in new impacts or increase the severity of previously identified impacts to biological resources. All APMs and mitigation measures identified in the Final EA/ISMND would be implemented for the Proposed Addition to reduce potential impacts to biological resources, including nesting birds and vegetation.

### 3.5. Cultural Resources

<b>TABLE 6 CULTURAL RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>V. Cultural Resources</b> <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Less than significant impact	No	No	CR 1-10 (CR-8 not applicable to Proposed Addition)
b) Cause a substantial adverse change in the significance of an	Less than significant impact	No	No	None

<b>TABLE 6 CULTURAL RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
archaeological resource pursuant to § 15064.5?				
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than significant impact	No	No	CR-7, CR-8 (CR-8 not applicable to Proposed Addition)

Section V of Appendix A of the Final EA/ISMND and concurrence letters from the California State Historic Preservation Officer (SHPO) to the federal agencies and from the California Department of Transportation (Caltrans) Cultural Studies Office (CSO) to Caltrans determined that the project would have a less than significant impact to cultural resources. A 0.50-mile Area of Potential Effect/Impact (APE/API) along the entire project alignment was evaluated for direct and indirect effects to cultural resources (Loftus et al. 2022). Records searches were conducted at the Northwest and Northeast Information Centers of the California Historical Resources Information Center, and historical and geologic maps and information were reviewed to assess the potential for Historic-period and precontact Native American archaeological deposits. Therefore, the Proposed Addition falls within the API of the Cultural Resources Inventory Report (CRIR), so a supplemental records search was not required.

However, the Proposed Addition falls outside the project area surveyed for cultural resources. In April 2023, an intensive pedestrian survey of the Proposed Addition’s ROW and a 100-foot-wide buffer was performed, and a supplemental letter report detailing the results and avoidance measures was prepared (Hollreiser 2023). The survey identified a total of three cultural resources, including one resource previously identified in the CRIR, one noted find, and one newly recorded resource.

In accordance with the CRIR, the newly recorded resource will be treated as an eligible resource, and all resources will be avoided by the recommended construction method. Because this Proposed Addition falls outside the Caltrans and federal agencies’ jurisdictions, supplemental consultation with the CSO and SHPO was not conducted.

The Proposed Addition would implement the APMs for cultural resources identified in the Final EA/ISMND, including measures for discovery of buried resources or human remains. The additional segment would not result in a new significant impact or increased severity of impacts to cultural resources.

### 3.6. Energy

<b>TABLE 7 ENERGY</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>VI. Energy</b> <i>Would the project:</i>				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	No impact	No	No	None
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No impact	No	No	None

Section VI of Appendix A of the Final EA/ISMND determined the project would have no impact on energy. Similarly, the Proposed Addition would require a negligible additional amount of fuel to operate machinery and vehicles. Therefore, the Proposed Addition would create no new impact.

### 3.7. Geology and Soils

<b>TABLE 8 GEOLOGY AND SOILS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>VII. Geology and Soils</b> <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Less than significant impact	No	No	None
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial	No	No	No	None

<b>TABLE 8 GEOLOGY AND SOILS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
evidence of a known fault? Refer to the Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?	No	No	No	None
iii) Seismic-related ground failure, including liquefaction?	No	No	No	None
iv) Landslides?	Less than significant impact	No	No	None
b) Result in a substantial soil erosion or the loss of topsoil?	No impact	No	No	None
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than significant impact	No	No	None
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No impact	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No impact	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Less than significant impact	No	No	None

Section VII of Appendix A of the Final EA/ISMND determined the project would have a less than impact upon geology and soils. The project area crosses several mapped faults as described under the 1972 Alquist-



Priolo Earthquake Fault Zoning Act. However, the Proposed Addition is more than 50 miles from the nearest mapped Alquist-Priolo Earthquake Fault.

The Final EA/ISMND identified the primary geologic hazard for the project as the risk of landslide due to the alignment running adjacent to steep slopes and through areas of mapped landslides. The Proposed Addition is located along a relatively flat road and over 100 miles away from the nearest landslide listed on the California Landslide Inventory Map.

The Proposed Action and whole project involve the removal and replacement of a minimal amount of topsoil. The impacts would be short-term and minor as the soil would be removed, stored temporarily, and used to backfill the trench. Vero plans to utilize the HDD construction method along the Proposed Addition, which would limit surface disturbance to three to four bore pits along the proposed segment. The bore pits would likely be 4 feet by 4 feet with a maximum depth of 4.5 feet deep, with a maximum area of 10 feet by 10 feet. Erosion control BMPs will be utilized according to the measures in Appendix G of the Final EA/ISMND and the Restoration Plan.

The San Diego Natural History Museum prepared a Paleontological Resources Technical Report for the whole project and found that project areas intersect areas with high and moderate Potential Fossil Yield Classification (PFYC). The report analyzed the alignment and a 0.50-mile-wide buffer, so the Proposed Action was evaluated in the report. The Proposed Action falls within PFYC 3 area, so paleontological monitoring will occur as described in the Paleontological Monitoring and Discovery Plan. The Proposed Addition would not cause a new impact or increase the severity of impacts to geology and soils, including landslide risk, topsoil loss, and paleontological resources.

### 3.8. Greenhouse Gas Emissions

<b>TABLE 9 GREENHOUSE GAS EMISSIONS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>VIII. Greenhouse Gas Emissions</b> <i>Would the project:</i>				
a) Generate greenhouse gas emissions, directly or indirectly, that may have a significant impact on the environment?	Less than significant impact	No	No	None
b) Conflict with an applicable plan, policy, or regulation adopt evidence of a known fault? Refer to the Division of Mines and Geology Special Publication 42.	No	No	No	None

Section VIII of the Final EA/ISMND determined the project would not generate greenhouse gas emissions that may have a significant impact on the environment nor conflict with an applicable plan, policy, or

regulation for the purpose of reducing greenhouse gases. The whole project is anticipated to generate an estimated total of 14,500 metric tons of greenhouse gas as carbon dioxide equivalent over the multiple years of construction. The Proposed Addition would produce a negligible amount of greenhouse gas due to the additional four days that vehicles and equipment will be operated. The Shasta County Air Quality Management District does not have CEQA thresholds or reporting thresholds for mobile source emissions. Therefore, the Proposed Action will not cause a new significant impact or increase in severity of an impact previously identified in the Final EA/ISMND.

### 3.9. Hazards and Hazardous Materials

<b>TABLE 10 HAZARDS AND HAZARDOUS MATERIALS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>IX. Hazards and Hazardous Materials</b> <i>Would the project:</i>				
a) Create a significant hazard to the public or environment through routine transport, use, or disposal of hazardous materials?	Less than significant impact	No	No	HZ-1, BIO-23
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant impact	No	No	HZ-1, BIO-23
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Less than significant impact	No	No	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would create a significant hazard to the public or the environment?	No impact	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or	No impact	No	No	None

<b>TABLE 10 HAZARDS AND HAZARDOUS MATERIALS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	None
g) Expose people or structures, either directly or indirectly, to a significant risk, loss, injury, or death involving wildland fires?	Less than significant impact	No	No	None

Section IX of Appendix A of the Final EA/ISMND evaluated the use of hazardous materials such as gasoline, diesel fuel, hydraulic oils, equipment coolants, and waste and determined the project would have less than significant impact. The addition of the 1400-foot alignment would result in a negligible increase in the quantity of hazardous materials used during construction activities due to the additional labor necessary.

The Proposed Addition is located more than five miles away from the Superfund Site identified in the Final EA/ISMND and would not pass through any other listed hazardous materials sites. The Proposed Addition is not located within two miles of a private or public use airport.

Similar to the whole project, the Proposed Action would not impair implementation or interfere with an adopted emergency response plan during the operational phase. During the construction phase, traffic control plans and other BMPs would be implemented to manage traffic flow and give emergency vehicles immediate passage around and/or through construction sites. The project modification would not create a new impact or increase the severity of impacts from hazardous materials with implementation of the APMs identified in the Final EA/ISMND.

### 3.10. Hydrology and Water Quality

<b>TABLE 11 HYDROLOGY AND WATER QUALITY</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>X. Hydrology and Water Quality</b> <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade the surface or ground water quality?	Less than significant impact	No	No	BIO-22, HYD-1, BIO-23, HZ-1, HZ-2, BIO-24, HYD-3, HYD-4
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No impact	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant impact	No	No	None
i) result in a substantial erosion or siltation on- or off-site;	Less than significant impact	No	No	None
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact	No	No	None
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than significant impact	No	No	None
iv) impede or redirect flood flows?	Less than significant impact	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release	No impact	No	No	None

<b>TABLE 11 HYDROLOGY AND WATER QUALITY</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
of pollutants due to project inundation?				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No impact	No	No	None

Section X of Appendix A of the Final EA/ISMND evaluated the potential direct and indirect, short-term, minor impacts to surface waters near the project. The Proposed Addition would not cross any waterways. In addition, all waterways within 100 feet of the proposed work area were observed as dry during an April 2023 survey, including the Anderson Cottonwood Irrigation Canal, which further decreases the risk to water quality.

The Proposed Addition is not located within a flood hazard zone. With implementation of the project-wide Stormwater Pollution Prevention Plan (SWPPP) and other BMPs, the Proposed Addition would avoid impacts to run-off and stormwater drainage systems.

The project modification would not cause a new impact or increase the severity of impacts to water quality with implementation of the project-wide Horizontal Directional Drilling Frac-out Contingency Plan, SWPPP, and the APMs in the Final EA/ISMND.

**3.11. Land Use and Planning**

<b>TABLE 12 LAND USE AND PLANNING</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XI. Land Use and Planning</b>				
<i>Would the project:</i>				
a) Physically divide an established community?	No impact	No	No	None
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No impact	No	No	None

Section XI of Appendix A of the Final EA/ISMND determined the project would have no impact on land use and planning, including the Shasta County General Plans. Because the Proposed Addition is within the established utility and transportation corridor and does not conflict with any land use plan, policy, or regulation, the Proposed Addition would not create a new impact.

### 3.12. Mineral Resources

<b>TABLE 13 MINERAL RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XII. Mineral Resources</b> <i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No impact	No	No	None
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No impact	No	No	None

Section XII of Appendix A of the Final EA/ISMND determined that the project would have no impact on mineral resources. Because the Proposed Addition is also within an existing transportation corridor on a residential street, there would be no new impact to mineral resources.

### 3.13. Noise

<b>TABLE 14 NOISE</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XIII. Noise</b> <i>Would the project:</i>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or	Less than significant impact	No	No	NOI 1-3

<b>TABLE 14 NOISE</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
applicable standards of other agencies?				
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	Less than significant impact	No	No	None
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact	No	No	None

Section XIII of the Final EA/ISMND determined that the project would not result in noise levels that would generate a substantial temporary increase in ambient noise levels. Noise impacts from construction would typically last no longer than two to three days at a single location and would be restricted to daytime hours. The equipment used for construction of the Proposed Addition would be the same equipment analyzed in the Final EA/ISMND.

The addition would increase the length of time during which noise associated with construction is generated by up to four days; however, the minor increased duration in noise would not be in a single location nor would it change the type of sensitive receptors impacted by the noise and future maintenance of the project. The proposed modification would not result in a new impact or increase to the severity of noise impact with implementation of the APMs identified in the Final EA/ISMND.

### 3.14. Population and Housing

<b>TABLE 15 POPULATION AND HOUSING</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XIV. Population and Housing</b> <i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area either directly (e.g., by	Less than significant impact	No	No	None

<b>TABLE 15 POPULATION AND HOUSING</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No impact	No	No	None

Section XIV of the Final EA/ISMND determined that the project would have a less than significant impact on population and housing. The project involves installation of fiber optic cable to serve underserved and unserved areas and key “anchor” institutions. The project is not anticipated to induce unplanned growth in any areas it would serve, and the Proposed Addition would not increase the likelihood of unplanned growth in the Cottonwood area as it is part of the middle-mile phase of the project. The Proposed Addition would not create a new impact or increase the severity of an established impact.

**3.15. Public Services**

<b>TABLE 16 PUBLIC SERVICES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XV. Public Services</b> <i>Would the project:</i>				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services: fire protection, police protection,	No impact	No	No	None



<b>TABLE 16 PUBLIC SERVICES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
schools, parks, or other public facilities.				

Section XV of Appendix A of the Final EA/ISMND determined that the project would have no negative impact on public services because the project would improve delivery of internet and communication services for emergency services and schools, parks, and other public facilities. The modification would not create new impacts.

### 3.16. Recreation

<b>TABLE 17 RECREATION</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XVI. Recreation</b> <i>Would the project:</i>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No impact	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant impact	No	No	RC-1, RC-2, RC-3 (not applicable to Proposed Addition)

Section XVI of Appendix A of the Final EA/ISMND determined that the project would have no impact on recreation as it would not create any additional recreational capacity or increase in the usage of recreational areas and facilities. The project modification would not result in a new impact on recreation as the Proposed Addition is along a residential street.

### 3.17. Transportation

<b>TABLE 18 TRANSPORTATION</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XVII. Transportation</b> <i>Would the project:</i>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than significant impact	No	No	None
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	No impact	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact	No	No	None
d) Result in inadequate emergency access?	No impact	No	No	None

Section XVII of Appendix A of the Final EA/ISMND analyzed traffic impacts associated with construction, including potential lane closures, and determined that the project would have a less than significant impact on transportation. The Proposed Addition could potentially result in temporary traffic delays along Trefoil Lane and Locust Road. However, the additional construction should only require up to four days, so any impacts to traffic will be short-term. The project modification would not create a new impact or increase the severity of impacts analyzed in the Final EA/ISMND with implementation of the APMs identified in the Final EA/ISMND, including the requirement for a Traffic Management Plan.

### 3.18. Tribal Cultural Resources

<b>TABLE 19 TRIBAL CULTURAL RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XVIII. Cultural and Tribal Resources</b> <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:	Less than significant impact	No	No	CR 1-8 (CR-8 is not applicable to Proposed Addition)
i) Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Less than significant impact	No	No	CR 1-8 (CR-8 is not applicable to Proposed Addition)
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Less than significant impact	No	No	CR 1-8 (CR-8 is not applicable to Proposed Addition)

Section XVIII of Appendix A of the Final EA/ISMND determined that the project would have a less than significant impact on tribal cultural resources. The newly recorded resource is not considered a tribal cultural resource as defined in PRC 21074. All cultural resources will be avoided as described in the CRIR, and the resource protection measures would address impacts of inadvertent discoveries. The project

modification would comply with the APMs and mitigation measures for tribal cultural resources identified in the Final EA/ISMND and CRIR.

### 3.19. Utilities and Service Systems

<b>TABLE 20 UTILITIES AND SERVICE SYSTEMS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XIX. Utilities and Service Systems</b> <i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant impact	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	No impact	No	No	None
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No impact	No	No	None
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No impact	No	No	None
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No impact	No	No	None

Section XIX of Appendix A of the Final EA/ISMND determined the project would have a less than significant impact on utilities and service systems. The project would not require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, or natural gas.

The Proponent will submit engineering plans to Shasta County to review for issuance of an amended encroachment permit for the Proposed Addition. If Shasta County locates public utilities in the path of the Proposed Action, the Proponent will relocate the alignment to avoid the public utilities. The project modification would not create a new impact or increase the severity of impacts analyzed in the Final EA/ISMND.

### 3.20. Wildfire

<b>TABLE 21 WILDFIRE</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
<b>XX. Wildfire</b> <i>Would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No impact	No	No	None
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less than significant impact	No	No	PH-1, PH-2
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No impact	No	No	None
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No impact	No	No	None

Section XX of the Final EA/ISMND determined that the project would have less than significant impact on wildfire risk. The Proposed Addition is located completely within an existing utility corridor on a residential street. Vehicle or equipment sparks pose a minor risk of wildfire, but the surrounding area has low risk of wildfire. The Proposed Addition would not create a new impact or increase the severity of impacts with implementation of the APMs identified in the final EA/ISMND, including implementation of the Fire Prevention Plan developed by Transcon in 2022.

## **4.0 CONCLUSION**

The previous environmental document as herein amended may be used to fulfill the environmental review requirements of the current project. The project satisfies the conditions outlined in CEQA Guidelines §15164. The proposed project modification is deemed as non-substantial and would not result in any new significant impacts or any substantial increases in the severity of the previously identified environmental impacts. Consequently, the modifications do not otherwise trigger the need to prepare a subsequent negative declaration pursuant to CEQA Guidelines §15162. Therefore, there is no requirement to prepare a supplemental or subsequent negative declaration to address the environmental resources discussed above.

## **5.0 REFERENCES**

Hollreiser, Kelly. 2023. Cultural Resources Survey Results for the Cottonwood Endpoint Fiber Optic Installation Project. Transcon Environmental, Inc.

Lotus, Shannon; Everett Bassett, Victoria Harvey, Tim Jones, Kelly Larsen, Bronwynn Lloyd, Jessica Neal, Daniel Parker, Lucian Schrader III, Tad Schwennesen, Peter von Der Porten, Zachary Starke, and Erica Thompson. 2022. Cultural Resources Inventory Report. Transcon Environmental, Inc.

Transcon Environmental, Inc. (Transcon). October 2022. Digital 299 Broadband Project, Final Environmental Assessment and Initial Study/Mitigated Negative Declaration.

## **Appendix A Initial Study**



**INITIAL STUDY / MITIGATED NEGATIVE DECLARATION**

NOTE: The following is a sample form that may be tailored to satisfy individual agencies' needs and project circumstances. It may be used to meet the requirements for an initial study when the criteria set forth in the California Environmental Quality Act (CEQA) Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

1. Project title: Digital 299 Broadband Project- Cottonwood Endpoint

2. Lead agency name and address:

California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

3. Contact person and phone number: Michael Rosauer, 415-601-5008

4. Project location: Trefoil Lane in Cottonwood, County of Shasta

5. Project sponsor's name and address:

Vero Fiber Networks  
1023 Walnut Street  
Boulder, Colorado 80302

6. General plan designation: County The proposed addition spans local and private lands in Shasta

7. Zoning: Single family residential and mixed-use zoning

8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The Proposed Addition includes the installation of approximately 1,400 feet of new underground conduit along the existing right-of-way as a part of the middle-mile phase of the adopted Project. The Addition would occupy existing roads in a residential and mixed-use zone. See Chapter 2 of the Environmental Assessment (EA) for more details about the Project.

9. Surrounding land uses and setting: (Briefly describe project's surroundings)

The Proposed Addition is located within existing transportation and utility corridors. The primary existing land uses in the Project area are transportation and utilities. The Addition would be

surrounded by developed land in suburban and rural areas. Developed land uses within or adjacent to the Project area include agricultural land and suburban residential properties.

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

Shasta County (amendment to previously issued encroachment permit)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Pursuant to Section 106 of the National Historic Preservation Act and California Assembly Bill 52, consultation with Tribes began shortly after federal and state agencies were informed and engaged in the Digital 299 Project. A tribal contact list was compiled with input from the Native American Heritage Commission as well as federal and state agencies involved in the Project. Tribal input was factored into Project routing, engineering, and protection measures for areas and sites of concern to Tribes. The Proposed Addition does not require additional tribal consultation because the location of the Proposed Addition does not intersect any areas or sites of concern to Tribes.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this Proposed Addition, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture / Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources               | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils                   | <input type="checkbox"/> Greenhouse Gas Emissions         | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology/Water Quality         | <input type="checkbox"/> Land Use / Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                           | <input type="checkbox"/> Population / Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                      | <input type="checkbox"/> Transportation                   | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities / Service Systems     | <input type="checkbox"/> Wildfire                         | <input type="checkbox"/> Mandatory Findings of Significance |

**DETERMINATION**

On the basis of this initial evaluation:

I find that the Proposed Action COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the Proposed Action could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the Proposed Action MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the Proposed Action MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) is required, but it must analyze only the effects that remain to be addressed.

I find that although the Proposed Action could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Action, nothing further is required.

Michael E. Rosauer                      6-22-23  
Signature    Date

**EVALUATION OF ENVIRONMENTAL IMPACTS**

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063[c][3][D]). In this case, a brief discussion should identify the following:
  - a) Earlier Analyses Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significant.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Expect as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

the project conflict with applicable zoning and other regulations governing scenic quality?

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

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

No impact: The Proposed Addition would be located entirely underground and would consequently cause no long-term change to the visual character of the surrounding landscape. Addition components would be located within already developed transportation corridors. There are no areas where conduit and fiber are installed above ground. There would not be an impact to any scenic vista.

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

No impact: The Proposed Addition is entirely below ground within existing transportation corridors that have previously been disturbed. There would no impact to state scenic resources.

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

No impact: The Proposed Addition would be buried underground and would consequently cause no long-term change to the visual character of the surrounding landscape. The only visible project component would be two access vaults at the proposed endpoint which would be flush with the rest of the ground cover. There are existing access vaults and utility lines along the residential roadway, so the additional vaults would not degrade the existing visual character of the residential roadway.

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

No impact: The buried fiber constructed as part of the Proposed Addition would not result in any source of light or glare.

Issues	Less Than			
	Potentially Significant	Less Than Significant with Mitigation	Significant	No Significant Impact

**II. AGRICULTURE AND FORESTRY RESOURCES.** In determining whether impacts to agriculture resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; as well as forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b) Conflict with existing zoning for agricultural use or a Williamson Act contract?
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as

- |   |                          |                          |                          |                                     |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No impact: The Proposed Addition involves the placement of conduit and telecommunications fiber within established utility or transportation corridors and/or on existing structures. In Shasta County, the area does not intersect but is adjacent to several parcels designated by Shasta County as AgriculturalCroplands, some of which are also designated by the CDC as Prime Farmland and Farmland of Statewide Importance; however, none of the Addition area intersects areas zoned as farmland. There would be no conversion and thus no impact.

**b) Conflict with existing zoning for agricultural use or a Williamson Act contract?**

No impact: The Proposed Addition does not intersect any areas under Williamson Act contracts. The fiber installation would occur underground within existing transportation and utility corridors and would not impact agricultural land uses. There would be no conflicts with existing zoning for agricultural use or Williamson Act contracts.

**c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

No impact: The Proposed Addition does not have any sections located within forest or forest-zoned lands. There would be no impact.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

No impact: The Proposed Addition involves placement of facilities within established transportation and utility corridors. There would be no impact.

**e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No impact: There are no other foreseen changes resulting from the Proposed Addition that would result in conversion of farmland to non-agricultural use or forest land to non-forest use. There would be no impact.

Impact	Issues	Less Than Significant			No
		Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	
<b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
	a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less than significant impact: The Project area lies completely within Shasta County, which is part of the Sacramento Valley Air Basin (SVAB). The SVAB is listed as in nonattainment for multiple pollutants; however, the Shasta County AQMD, the affected subsection of the SVAB, is only in nonattainment for O<sub>3</sub> and is in attainment or unclassified for all other criteria pollutants (CARB 2019). Other counties within the SVAB contribute to its nonattainment status for other pollutants.

The construction pollutant emissions were calculated using the emissions factors for the various heavy equipment used for the Project and the estimated number of days of construction and hours of construction per day (see **Appendix H** of the EA). The modeling results for construction emissions of the whole Project (also contained in EA) are summarized in **Table 1**.

<b>TABLE 1 ESTIMATED CONSTRUCTION EMISSIONS BY POLLUTANT (METRIC TONS) FOR WHOLE DIGITAL 299 PROJECT</b>						
<b>CO</b>	<b>NO<sub>x</sub></b>	<b>O<sub>3</sub> (as VOC<sup>a</sup>)</b>	<b>PM<sub>2.5</sub></b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>CO<sub>2</sub></b>
48.2	137	12.0	10.3	10.6	20.0	14,500
<sup>a</sup> Volatile organic compound						

The Proposed Addition would contribute O<sub>3</sub> and O<sub>3</sub> precursors to the atmosphere. Shasta County is currently considered to be in nonattainment for 1-hour and 8-hour O<sub>3</sub> standards; however, the regularity of instances where O<sub>3</sub> levels exceed the air quality standards is infrequent, and the severity of exceedance is fairly low. In 2015, 2016, and 2017 there were a total of 11 days, 14 days, and 0 days, respectively, where the 8-hour standard was exceeded at the Shasta Lake Boulevard monitoring station. The Shasta County Health Department monitoring station recorded 5 exceedance days in 2016 and 0 the other two years. At the Anderson monitoring station, both 2015 and 2016 experienced two days where the 8-hour O<sub>3</sub> standard was exceeded, and the standard was never exceeded during 2017. At all locations during these three years, there were 0 days where the 1-hour standard was exceeded (SVAQEEP 2018). All locations show a decreasing trend in the number of days that the 8-hour standard is exceeded since 2007 (SVAQEEP 2018).

As construction of the Proposed Addition would occur for only up to four work days, would be dispersed along a linear route, and is located in low-density residential areas where air quality is generally better, it

was determined that the emissions generated by the Proposed Addition would be unlikely to directly or indirectly result in additional exceedance days for the O<sub>3</sub> standard in Shasta County.

It is difficult to determine how quickly air pollutants would be dispersed, as this is a function of many factors, including wind speed, wind direction, temperature, and atmospheric stability, among others. In unstable conditions, ground-level pollution is readily dispersed, while stable conditions typically result in pollution remaining near ground level.

Using a simplistic “box” model where pollutants only disperse within an area 100 meters to either side of the Project corridor and no more than 25 meters above ground surface, average O<sub>3</sub> emissions within this zone would be 0.009 parts per million or less, assuming the crews cover an average of 300 meters per day. This is representative of what might be encountered in close proximity to the Project area. Over time, concentrations would dissipate even further, resulting in a negligible net effect on ambient conditions. Given the highly transient nature of Addition construction through low-density areas, air quality impacts to sensitive receptors are anticipated to be negligible.

In order to reduce the generation of criteria pollutants, resource protection measure **AQ-2**, Minimize Idling, will be implemented to reduce the unnecessary emissions of O<sub>3</sub>, nitrous oxides (NO<sub>x</sub>), and PM<sub>10</sub>.

Idling times for vehicles must be no longer than 5 minutes, as required by California Code of Regulations (CCR), Title 13, Sections 2449(d)(3) and 2485. Additionally, resource protection measure **AQ-3**, Equipment Maintenance, is implemented to ensure all equipment is maintained in proper working conditions according to manufacturer specifications.

The Addition would result in temporary, localized increases in pollutant concentrations as construction progresses, but effects would be spread out over distance and time and do not represent a cumulatively considerable net increase the pollutant for which the air basin is in nonattainment.

While the Addition has the potential to emit criteria pollutants that are of concern within the air basin, given the location of the Project in relation to urban areas and the dispersed nature of the emissions over time and distance, the Proposed Addition is highly unlikely to conflict with an adopted air quality plan or cause the whole Digital 299 Project to conflict with an adopted air quality plan. The impact is determined to be less than significant and would be further minimized by the implementation of resource protection measures mentioned above.

***b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?***

Less than significant impact: Based on the analysis and discussion in subpart a), the Project has the potential to generate criteria pollutants within the SVAB that are currently in nonattainment. The pollutant within SVAB is O<sub>3</sub>.

As discussed in subpart a), the nonattainment areas for O<sub>3</sub> are typically urban areas. Part of the Proposed Addition alignment passes through low-density housing, but other sections are adjacent to undeveloped land where O<sub>3</sub> concentrations are lower. O<sub>3</sub> emissions from Addition construction would also be temporary, minor, and dispersed over time and distance.

As discussed in subsection a), resource protection measures will be implemented to reduce O<sub>3</sub> impacts. Given that construction would only result in temporary, minor, localized impacts that are unlikely to violate an air quality standard or contribute substantially to nonattainment within SVAB, the impact to the basin would be less than significant.

***c) Expose sensitive receptors to substantial pollutant concentrations?***

Less than significant impact: Air quality impacts would be temporary and minor, typically lasting two to three workdays in the immediate vicinity of any receptors. The pollutant concentrations resulting from the



construction work are also minimal, as each Project construction crew would consist of a few pieces of heavy equipment and a handful of pickup trucks. There are some private residences along the alignment, but these are only considered sensitive receptors if there would be a long-term effect.

As a result, the Proposed Addition is anticipated to have a less than significant impact regarding exposure of sensitive receptors to substantial pollutant concentrations.

***d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

No impact: Construction and operation of the Proposed Addition is not anticipated to result in any other emissions that would affect a substantial number of people. There would be no impact.

### **Air Quality Protection Measures**

- **AQ-1. Fugitive Dust Control Measures.** The applicant shall implement the following dust control measures during Project construction:
  - Water all exposed surfaces two times daily unless already wet from precipitation. Exposed surfaces include but are not limited to spoils piles, graded areas, unpaved parking areas, staging areas, and access roads.
  - Cover or maintain at least 2 feet of free-board space on haul trucks transporting soil, sand, or other loose material off-site. Any haul trucks that travel along freeways or major roadways should be covered.
  - Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).

*Applicability: Project wide, for the duration of construction.*

- **AQ-2. Minimize Idling.** Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes, as required by CCR, Title 13, Sections 2449(d)(3) and 2485.

*Applicability: Project wide, for the duration of construction.*

- **AQ-3. Equipment Maintenance.** Maintain all construction equipment in proper working condition according to manufacturer specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before its first operation at a Project site as well as routinely checked thereafter.

*Applicability: Project wide, for the duration of construction.*

No Issues	Impact	Potentially Significant with Mitigation	Less Than Significant Impact	Less Than Significant Impact Incorporated
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**IV. BIOLOGICAL RESOURCES.** Would the project:

- |   |                          |                                     |                                     |                                     |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the CDFW or USFWS? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, or coastal) through direct removal, filling, hydrological interruption, or other means?                     | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?            | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

***a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the CDFW or USFWS?***

Less Than Significant with Mitigation Incorporated: Special status species include those species protected by federal and state endangered species statuses and regulations as well as those by state and federal agencies. Direct and significant impacts could occur if Vero Fiber Networks (Vero) places bore pits in vegetation areas. Mitigation measures described in the Restoration Plan (AMM BIO-3) will contribute to reducing any unavoidable impacts to a less than significant level by restoring disturbed vegetation to near pre-disturbance levels (i.e., at least 80 percent of the total pre-construction percent cover), stabilizing soils, and minimizing the introduction or spread of invasive plants (i.e., so that invasive plants comprise less than 15 percent of total cover). Specifically, the impacted areas will be revegetated with a native seed mix; all exposed or disturbed areas (i.e., waterways and vegetated areas) within the construction corridor will be returned to pre-existing contours and conditions; and impacted areas will be monitored and maintained for a minimum of three years to ensure bank stabilization, regeneration of wanted species, accessibility, and compliance with annual and final performance standards, thereby reducing any impacts to less than significant.

In addition, significant impacts to special-status plants are expected to be avoided and minimized by the pre-construction surveys described in avoidance and minimization measure (AMM) BIO-3 and the special-status plant clearance surveys described in AMM BIO-8. If sensitive natural communities are found in work areas or overland access routes during pre-construction surveys, those work areas and access routes will be repositioned where possible to avoid the plant(s) and a suitable buffer area to prevent root damage or other incidental damage, thereby avoiding direct and significant impacts to special-status plants. Per AMM BIO-8, if planned construction activities may result in impacts to special-

status plant species in areas that cannot be avoided by a minor re-route, the Project biologist will contact the appropriate agency to discuss the potential for salvaging the affected plants.

Impacts to other special-status taxa are expected to be less than significant. During an April 2023 survey of the Proposed Addition, the habitat was heavily disturbed and contained only ruderal grassy areas and drainage ditches. Although some native plant species were identified, no special status species or habitat available for sensitive species was observed.

The following federal and state laws were incorporated into the impact assessment for all special-status species and general wildlife:

- Bald and Golden Eagle Protection Act (50 Code of Federal Regulations [CFR] 22)
- California Coastal Act (14 CCR 13000 et seq, California Public Resources Code [CPRC] 30000 et seq)
- California Endangered Species Act (14 CCR 783 et seq)
- CEQA(14 CCR 15000 et seq, CPRC 21000 et seq)
- California Fish and Game Code (Section 1600 et seq)
- Clean Air Act (40 CFR 50 et seq)
- Clean Water Act (40 CFR 100 et seq)
- Federal Endangered Species Act (50 CFR 17)
- Magnuson-Stevens Fishery Conservation and Management Act (50 CFR 600)
- Migratory Bird Treaty Act (50 CFR 21)
- National Historic Preservation Act (36 CFR 80)
- National Environmental Policy Act (40 CFR 1500-1508)
- Rivers and Harbors Act (33 CFR 209 et seq)
- Wild and Scenic Rivers Act (36 CFR 297)

#### *Determination of Special-Status Species to be Reviewed*

Species lists for special-status wildlife, plants, lichen, and fungi were based on occurrence data within 1.5 miles of the whole Project footprint. A 1.5-mile search radius was chosen to identify potential special-status species because it encompasses a sufficient distance to accommodate for local habitat diversity and account for species most likely to migrate into the Project area. These data were collected to understand and characterize potentially affected biological resources. Occurrence data was evaluated for accuracy and to assess the potential for species occurrence within the survey area based on habitat suitability and quality. Species that did not meet the criteria for retention in further analyses were excluded from further review. Because the Addition falls within the 1.5-mile buffer of the whole Digital 299 Project, an additional desktop review was not performed for the Addition.

Reconnaissance-level field surveys were conducted along the Digital 299 Project on multiple occasions from April 2019 through May 2021; the surveys assessed the Project area within 25 feet from the edge of roadways. A supplemental reconnaissance level survey was conducted in April 2023 along the Proposed Addition. The purpose of the survey was to characterize potential habitat for special-status species; map/confirm the presence of aquatic resources; and identify any special-status wildlife, plants, bryophytes, lichen, and fungi that may occur within the Project area. Although the April 2023 survey did not observe any special status species or potential habitat, the analysis and resource protection measures would further minimize the potential impacts to biological resources as a result of the Proposed Addition.

#### *Analysis of Project Impacts to Plants and Fungi*

Direct and significant effects to special-status plants could occur from construction activities if Vero places bore pits in vegetated areas, as individual plants could be inadvertently crushed or buried by heavy machinery and vehicles or trampled by personnel up to approximately 3-4 bore pit excavation sites. Mitigation measures described in the Restoration Plan (**AMM BIO-3**) will reduce any unavoidable impacts to a less than significant level by restoring any disturbed sensitive vegetation to predisturbance levels.

In practice, significant impacts to special-status plants are expected to be avoided and minimized by the preconstruction surveys described in **AMM BIO-3** and the special-status plant clearance surveys described in **AMM BIO-8**; if sensitive natural communities are found in work areas or overland access routes during pre-construction surveys, those work areas and access routes will be repositioned to avoid direct and significant impacts to special-status species. As described in **AMM BIO-8**, clearance surveys for special-status plant species will occur prior to construction in appropriate habitat during appropriate seasons when special-status plants are present and identifiable (typically in spring and summer). If planned construction activities may result in an impact to special-status plant species, the following measures will be taken: 1) a minor re-route of the alignment would be made to avoid the plant(s) and a suitable buffer area to prevent root damage or other incidental damage or 2) in areas that cannot be avoided by a minor re-route, the Project biologist will contact the appropriate agency to discuss the potential for salvaging the affected plants. A biological monitor shall be responsible for designating an appropriate buffer area or bore depth to minimize potential adverse impacts to the plants and their roots.

Direct effects to fungi could occur from trampling aboveground sporocarps (fruiting bodies) of fungal organisms during construction but would not affect the population overall. Impacts to the belowground portion (hyphae) of the organism are not likely. Soil disturbance from trenching would not likely impact any special-status fungal species since any soil disturbance would be limited to a small area as it relates to the entirety of the belowground portion of the fungal organism.

Indirect effects to special-status plants and fungi may also occur. Specifically, indirect effects include disruptions to the native seedbank, localized changes to hydrologic conditions, increased erosion and sediment transport, and the potential introduction of non-native invasive species.

In summary, the Restoration Plan and **AMMs BIO-3, BIO-8, and BIO-9** will avoid or minimize effects to special-status plants and fungi to the extent practicable. Measures in the Restoration Plan and **AMM BIO-3** will reduce impacts to a less than significant level in the event they do occur by restoring disturbed sensitive vegetation to pre-disturbance levels.

#### *Analysis of Project Impacts to Special-Status Birds*

Nesting birds are afforded protection and consideration per specific requirements in the CDFW code of regulations (CDFW code 3503 and 3503.5) as well as the Migratory Bird Treaty Act. Unlike other portions of the Project alignment, suitable habitat for the Marbled Murrelet (MAMU) and Northern Spotted Owl (NSO) is not in the vicinity of the Proposed Addition.

#### *Analysis of Project Impacts to Nesting Birds*

Long-term ecological changes (e.g., quality of habitat, extent of habitat loss) to nesting bird habitat would not occur due to the Proposed Addition. To avoid and minimize adverse effects to nesting birds, the avoidance measures at the end of this section will be implemented; these measures require a nesting bird survey be completed within 7 days prior to any work occurring during the nesting bird season (February 15 and August 31). If an active nest is encountered in or adjacent to a work area, a no-equipment/no-activity buffer will be implemented around the nest, or the nest will be monitored by a biological monitor for disturbance. Nesting bird surveys will include searching for eagle nests within 2,640 feet of work between January 1 and August 31 in potentially suitable habitat on all lands. Impacts to nesting birds would be less than significant and would be further minimized by the implementation of these measures.

#### *Analysis of Project Impacts to Special-Status Mammals*

Work occurring during twilight hours has the potential to disrupt foraging behavior of special-status mammals that may be present in the Project area (generally nocturnal or crepuscular species). The Project would not remove or alter important habitat elements; however, indirect impacts to individual mammals are possible due to noise during construction, as described below.

Since work would not occur at night, sensitive bats are unlikely to be encountered during normal work hours. The Project would not modify or remove suitable roosting, hibernation, or foraging habitat for bats. Minimal vegetation removal may occur, and no large trees or snags suitable for roosting would be removed (no trees greater than 6 inches DBH). It is expected that individual adult bats in day or night roosts would flee the area during construction and not be injured; however, adult individuals may be adversely affected by disruptions to hibernation, and adult bats may abandon maternity colonies. The measures below require pre-construction surveys of bridges for the presence of bats during maternity or hibernation seasons. If bats are observed, work will not proceed without consultation with CDFW. Impacts to bats would be less than significant and would be further minimized by these measures.

The Proposed Addition would be located in previously disturbed, existing road ROWs or utility easements, and no large trees, logs, snags, or brush piles suitable for Pacific fisher or ring-tailed cat would be removed. During natal denning seasons, noise from construction equipment and the presence of humans in the Project area could disrupt Pacific fisher or ring-tailed cat foraging behavior or prompt change of denning sites, possibly impacting reproductive success. Implementation of the below avoidance measures which require pre-disturbance denning mammal surveys during the denning mammal natal season and temporarily halting work if present will further minimize impacts. Similar to the mammals described above, the Proposed Addition would not modify or remove suitable nesting or foraging habitat for the Sonoma tree vole, an arboreal species. Direct effects to individuals are not expected because work would occur during the day, and Sonoma tree voles are active at night. Impacts to this species would be less than significant.

#### *Analysis of Project Impacts to Special-Status Reptiles*

California mountain kingsnake and western pond turtle (WPT) are analyzed together because potential impacts to these species are expected to be similar. While California mountain kingsnake is a habitat generalist and may be found along much of the Digital 299 Project alignment, WPT is typically found in or within 650 feet of perennial waters. Since the Proposed Addition would be constructed along disturbed shoulders of roads away from suitable habitat for these species, impacts are expected to be minimal.

#### *Analysis of Project Impacts to Special-Status Amphibians*

Impacts to special-status amphibians (frogs, salamanders, and toads) are expected to be minimal because much of the Project would be constructed along disturbed shoulders of major roads away from suitable habitat for these species. Trenching, HDD, and other ground-disturbing activities along these roads have the potential to impact habitats and any amphibians that reside therein.

During construction, amphibians may be crushed by heavy machinery and vehicles, trampled by personnel, or buried during soil-disturbing activities. If construction occurs during sensitive breeding seasons, noise and ground vibration from construction activities may result in physiological stress to breeding individuals, hampering their ability to find mates and reproduce (Megela et al. 2018). Soil disturbance during construction could result in sedimentation of nearby waters, lowering water quality through increased turbidity. This increase in sediment has the potential to affect special-status amphibians by reducing overall abundance of eggs and larva as well as altering their overall growth and development rates (Wood and Richardson 2009). Indirect effects to special-status amphibians may also occur from Project-related activities in areas deemed suitable habitat from ground disturbance and other construction activities through the possible introduction of non-native, invasive species (e.g., other amphibians, pathogens) that may displace or predate native amphibians. Amphibians can also be sensitive to environmental contaminants, and indirect effects may occur from unintentional chemical spills (e.g., fuel, lubricants, etc.) during construction activities (Mahaney 1994). Sedimentation from ground-disturbing activities also has the potential to cause indirect effects to amphibians by altering water chemistry (increased pH), increasing water temperatures, and lowering macroinvertebrate productivity.

The April 2023 reconnaissance level survey reported that the aquatic resources in the vicinity of the Proposed Addition project work areas were heavily disturbed, and the waterways were dry. **AMM BIO15**,

which calls for pre-construction surveys for special-status amphibians when ground-disturbing work may occur near waterways; and **AMMs BIO 4-7** (Intermittent Waterways and Ephemeral Drainages, Wetlands, Riparian Areas, and Riparian Reserves), the Restoration Plan, and Stormwater Pollution Prevention Plan (SWPPP) will further avoid impacts to special-status amphibians and their habitats. Impacts to amphibians would be less than significant and would be further minimized by the implementation of these avoidance measures.

#### *Analysis of Project Impacts to Special-Status Fish*

No work is anticipated to occur below the ordinary high-water mark of any rivers, coastal lagoons, or perennial waterways; however, work has potential to decrease water quality and to change channel substrate, which can result in direct and indirect effects to both special-status fish and their critical habitat.

If sediment or pollutants enter the waterway at the time of construction, direct effects to fish and critical habitat may occur (USFWS and NMFS 1998). A change in sediment levels or texture can decrease suitability for anadromous fish spawning, rearing, and/or migration at and downstream of the work area. Depending upon the composition of the sediment and the flow and turbidity of the waterway, sediment could fall out of the water column immediately or may be carried some distance and impact downstream species. Hence, sediment deposition at the time of construction can be considered both a direct and an indirect impact to fish and fish habitat. Similarly, contamination by petroleum products or other pollutants (e.g., frac-out of bentonite) could cause direct effects to any individual fish present in the waterway at the time of the work and could also cause decreases in water quality downstream of the work. Respiration and other physiological processes may be negatively affected by such actions both directly and indirectly.

The Proposed Addition would not result in any permanent aboveground infrastructure in aquatic habitats. Long-term ecological changes (e.g., quality, extent) would not occur to fish habitat. Impacts to fishes would be less than significant and further minimized with the implementation of the following avoidance measures. **AMM BIO-14** details avoidance measures to aquatic resources and fisheries. These include avoiding disruptions of natural hydrologic flow paths, timing work and carrying out construction activities to avoid sedimentation at waterways, restricting trench/plow in perennial waterways, coordinating with USFS fisheries biologists where when work occurs within ephemeral and intermittent aquatic habitats or delineated wetlands, restrict ground disturbance and sidelaying where required, and a limited operating period (LOP) for Upper Klamath/Trinity spring-run Chinook salmon. **AMMs BIO 4-7** (Intermittent Waterways and Ephemeral Drainages, Wetlands, Riparian Areas, and Riparian Reserves), the Restoration Plan, and SWPPP will further avoid impacts to special-status fish and aquatic habitats.

#### *Analysis of Project Impacts to Special-Status Mollusks*

Impacts to special-status mollusks are not expected since the Proposed Addition would be constructed along disturbed roadsides and other unvegetated areas where leaf litter is limited and special-status mollusks are not traditionally seen.

The Addition would not result in any disturbance within suitable mollusk habitat.

#### ***b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?***

Less than Significant Impact The primary impacts to vegetation within the proposed Project area would be temporary impacts associated with excavating bore pits where barren, ruderal, annual grassland, shrubland, or vegetated areas may exist. Direct and significant impacts are not expected to occur along the Proposed Addition due to the lack of riparian habitat along the proposed alignment. No waterways were observed during the April 2023 surveys, but if dry waterways are trenched, mitigation measures described in the Restoration Plan (**AMM BIO-3**) will reduce any unavoidable impacts to a less than significant level by restoring any disturbed riparian vegetation to pre-disturbance levels (i.e., at least 80 percent of the total pre-construction percent cover), stabilizing banks and soils, and minimizing the introduction or spread of invasive plants (i.e., to comprise less than 15 percent of total cover). Specifically,

the impacted areas will be revegetated with a native seed mix; all exposed or disturbed areas (i.e., waterways and vegetated areas) within the construction corridor will be returned to preexisting contours and conditions; and impacted areas will be monitored and maintained for a minimum of three years to ensure bank stabilization, regeneration of wanted species, accessibility, and compliance with annual and final performance standards, thereby reducing any impacts to less than significant.

In practice, despite the existence of mitigation measures, significant impacts to riparian and other sensitive habitats are expected to be avoided and minimized by the riparian flagging and avoidance measures described in **AMM BIO-6**, the preconstruction surveys described in **AMM BIO-3**, and the special-status plant clearance surveys described in **AMM BIO-8**. Per **AMM BIO-3**, if sensitive natural communities are found in work areas or overland access routes during pre-construction surveys, those work and access areas will be repositioned to avoid direct and significant impacts to sensitive habitat. Per **AMM BIO-6**, equipment staging and placement of manholes, handholes, and bore pits will not occur within flagged riparian resources, and Vero will obtain and comply with all necessary USACE, State Water Resources Control Board and CDFW permits.

CDFW-defined sensitive natural communities do not occur within or along the Proposed Addition, including Willow thickets, beach pine, redwood–Douglas-fir, ceanothus chaparral, and pickleweedcordgrass communities. These communities are not within the immediate Project alignment and would not be directly affected.

Direct impacts to perennial and some intermittent waterways are unlikely because the Proposed Addition does not cross any recorded waterways. AMMs and BMPs (including the implementation of a SWPPP, Spill Prevention and Pollution Plan [SPPP], HDD Contingency Plan, and Restoration Plan) would minimize any effects to nearby waterways.

Because with mitigation, the Project would not have significant impacts to a population of federally or state-protected plants or fungi and would not replace native plant communities with noxious weeds, impacts to vegetation communities, sensitive communities, and Environmentally Sensitive Habitat Areas are expected to be direct, short term, and minor. Impacts will be further minimized with the implementation of AMMs and BMPs listed below, which require a clearance survey for special-status plants and communities prior to construction in appropriate habitat and a re-route of the alignment to avoid direct impacts, if necessary. If Vero places bore pits in vegetated areas, impacts to special-status species and sensitive habitats could occur. Mitigation measures described in the Restoration Plan will contribute to reducing impacts to a less than significant level.

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

No Impact: Permanent and/or direct impacts to wetlands are not anticipated. The Proposed Addition does not cross mapped or observed wetlands.

The Project and Proposed Action would not result in the loss of any federally or state-protected wetlands. Proposed Project impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act are determined to be less than significant and would be further minimized by the implementation of measures below. **AMM BIO-5** states that ground disturbing or other construction activity will not occur within the flagged boundaries of wetlands, and that HDD will be utilized to bore under wetlands to avoid impacts.

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



Less Than Significant Impact: Disturbance and impedance to any resident or migratory wildlife species at specific sites would be temporary and minimal. No element of the Project is anticipated to interfere with the movement or migration of fish or wildlife. Impacts are determined to be less than significant.

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

No impact: The Project would not conflict with any local policies or ordinances protecting biological resources, including any tree preservation policies or ordinances.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No impact: The Project would not conflict with the provisions of any Habitat Conservation Plans; Natural Community Conservation Plan; or other local, regional, or state habitat conservation plans.

### **Biological Resources Protection Measures**

- **AMM BIO-1. Biological Monitoring Requirements.** The Applicant shall designate one or more Project biologists. Project biologist refers to the qualified person assigned to ensure Projectwide biological measures identified in this document are followed and to document compliance with these measures. The Project biologist will also oversee other biologists and/or biological monitors. Biological monitor refers to a qualified person assigned to ensure biological measures are being implemented during construction activities.

Project biologist(s) or biological monitor(s) shall be on-site as needed according to AMMs. Project biologists and biological monitors shall be familiar with sensitive species and resources and the minimization measures for this Proposed Project. The Project biologist(s) shall be responsible for overseeing and training biological monitors; advising the applicant and contractor on compliance with biological measures; notifying the applicant of noncompliance with biological resources conditions; responding directly to inquiries of the lead agencies or resource agencies regarding biological resource issues; maintaining records of tasks related to compliance and reporting for biological resource measures; preparing monthly, annual, and final compliance reports; establishing and enforcing speed limits at Project work areas; and maintaining the ability for regular, direct communication with representatives of the CDFW, USFWS, BLM, USFS, and NPS, including notifying these agencies of dead or injured specialstatus species and reporting special-status species observations.

Daily logs—When on-site, the Project biologist(s) and/or biological monitor(s) shall maintain electronic records of daily activities, observations, and communications with the applicant or construction personnel. These records shall be made available for review to the lead agencies at any time during or following Project implementation.

Stop Work Authority—The Project biologist(s) and biological monitor(s) shall have written authority to require a halt to activities in any area when determined that there would be an unauthorized adverse impact to biological resources if the activities continued.

*Applicability: Project wide, where and when a monitor is needed.*

- **AMM BIO-2. Environmental Awareness Training.** Key personnel (e.g., crew leads, foremen) will complete an environmental awareness training on the protected species in and around the Project route and on required environmental protection measures. Training shall explain the need for and implementation of minimization measures. The training shall include supporting written material and electronic media, including photographs of protected species; providing information regarding the locations and types of sensitive biological resources within the Project alignment and adjacent areas as well as explaining the reasons for protecting these resources; informing

participants that no snakes, other reptiles, bats, or any other wildlife shall be harmed or harassed, with special emphasis on special-status species; and information on physical characteristics, distribution, behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures; identifying the Project biologist(s) and biological monitor(s) for contact or further comments and questions about the material discussed in the program; educating crews on noxious plants known to occur near the Project alignment; directing trainees to report all observations of listed species and their sign to the Project biologist for inclusion in the compliance reports; a discussion of the Project biologists' and biological monitors' stop work authority; and a training acknowledgment form to be signed by each worker indicating that they received training and shall abide by the guidelines.

*Applicability: Project wide.*

- **AMM BIO-3. Restoration Plan.** During final Project design, a Restoration Plan will be developed that provides detailed plans for the restoration of temporarily disturbed waterways and vegetated areas. The plan will outline restoration and conservation activities, locations, monitoring requirements, and criteria to measure mitigation success. Restoration shall include seeding with locally sourced native species, erosion control measures, non-native plant control, and site monitoring of the restoration of temporarily disturbed waterways and vegetated areas, including riparian habitat, if impacted. This plan shall also be submitted to and approved by the U.S. Army Corps of Engineers (USACE), USFWS, and CDFW prior to initiating any mitigation activities.
- **AMM BIO-4. Intermittent Waterways & Ephemeral Drainages.** No trenching will occur in intermittent waterways or ephemeral drainages where water is present in these features. Following trenching, intermittent waterways and ephemeral drainages will be restored to their original condition and contours per the guidelines outlined in the Restoration Plan.

*Applicability: Suitable habitat (will be mapped for construction crews).*

- **AMM BIO-6. Riparian Areas.** Prior to construction, a qualified biologist will flag the boundaries of riparian resources delineated in the Preliminary Jurisdictional Delineation Report (Transcon 2021). Project infrastructure will be designed to avoid these resources to the greatest extent practicable. During construction, crews will limit construction activities to the extent practicable. Equipment staging and placement of manholes, handholes, and boring pits will all occur outside of flagged riparian resources. If construction activities fill or disturb riparian areas, then Vero will do the following:
  - Vero will obtain and comply with all necessary USACE, State Water Resources Control Board, CDFW, and California Coastal Commission permits.
  - Impacted wetlands and/or riparian areas will be restored to pre-construction condition and monitored during and after disturbance. Restoration of temporarily impacted wetlands and riparian areas will be addressed in the Restoration Plan (AMM BIO-3).

*Applicability: Project wide.*

- **AMM BIO-8. Special-Status Plants.** The Project biologist shall conduct a clearance survey for special-status plant species immediately prior to construction in appropriate habitat. In areas affected by recent wildfire, surveys will be particularly thorough where occurrences of sensitive plants are mapped due to the elevated potential for dormant plant populations to reappear following burns. If planned construction activities may result in an impact to special-status plant species, the following measures will be taken: 1) a minor re-route of the alignment would be made to avoid the plant(s) and a suitable buffer area to prevent root damage or other incidental damage; or 2) in areas that cannot be avoided by a minor re-route, the Project biologist will contact the appropriate agency to discuss. A biological monitor shall be responsible for designating an appropriate buffer area or bore depth to minimize potential adverse impacts to

the plants and their roots. If re-alignment shall occur on BLM, USFS, or Whiskeytown National Recreation Area (NRA)-managed lands, the agency botanist must be contacted prior to work.

*Applicability: Suitable habitat (will be mapped for construction crews). (Biology ID: AMM BIO-7)*

- **AMM BIO-9. Invasive Species Prevention.** Contractor vehicles, equipment, tools, boots, and clothing will be cleaned inside and out prior to mobilization of Project segments to limit the introduction on non-native species and pathogens (e.g., Port Orford cedar root fungus) on the Project corridor, including in areas potentially affected by recent wildfire. Cleaning will occur prior to mobilization of the Project and when a work crew will move between project segments.

The additional measures below will be applied on federal lands at the following locations:

- Segment 7 between Berry Summit and the mouth of Willow Creek
- Segment 8 between Mayfair Street and Brannan Mountain Road
- Segments 11 and 12 between South Fork and Hennessey Roads
- Segments 14, 15, 15A, and 16 between Underwood Mountain and Corral Bottom Roads
- Segments 14A and 17 between Underwood Mountain and East Fork Roads
- Segment 18A1 between Valdor and Canyon Creek Roads
- Segment 18 between East Fork Road and Highway 299
- Segment 21 between Little Browns and Browns Mountain Roads
- Segments 22, 23, and 24 between Deadwood and Trinity Mountain Roads
- Segment 25 on SR 299 through Whiskeytown NRA

Exterior cleaning will consist of washing vehicles and equipment at an off-site location, with attention paid to the tracks, feet, and/or tires and on the undercarriage and with special emphasis on axles, frame, cross members, motor mounts, and on and underneath steps, running boards, and front bumper/brush guard assemblies. Vehicle cabs will be swept out, and refuse will be disposed of in waste receptacles to be disposed of at an approved off-site location. Hand tools and boots will be washed and clothing laundered. The Contractor will inspect vehicles, equipment, tools, boots, and clothing to ensure that they are free of soil and debris capable of transporting non-native vegetation seeds, roots, or rhizomes. Seeds and plant parts that result from the cleaning will be collected and bagged for disposal at an approved off-site location. If noxious or invasive weeds are within the construction corridor, vehicles will be cleaned before moving on to areas that are weed free or any location affected by wildfire.

Contractors will avoid or minimize all types of off-road travel that may result in the collection and dispersion of non-native vegetation by construction vehicles and equipment.

Activity boundaries, including equipment staging and parking areas, shall avoid known noxious plant infestation. If unavoidable, prior to implementation of operations where invasive plants are present, invasive plant-infestations shall be bladed away from equipment and access routes before operations start. Removed invasive plants or shrubs should be located on the edge of the clearing out of the way of operations to avoid retrieval on equipment. Equipment/machinery shall be cleaned prior to leaving the infested area to operate in another non-contiguous area. Activity boundaries shall avoid areas recently burned by wildfire to the extent possible.

Prior to construction occurring at staging areas and where ground disturbing activities will take place on USFS lands, a botanist will consult invasive plant spatial data (i.e., Natural Resource Information System, California Invasive Plant Council/Calfora invasive plant layers), survey for invasive plants, document invasive species present, and prescribe site-specific measures.

Rock, sand, or any material used for soil erosion control shall originate from a certified weedfree source if available. Rock source shall be inspected by staff trained in invasive plant identification. Permittee shall provide documentation that material is weed free. (see <https://www.cal->

[ipc.org/solutions/prevention/weedfreeforage/](http://ipc.org/solutions/prevention/weedfreeforage/) and <https://www.calipc.org/solutions/prevention/weedfreegravel/> for more information about weed-free erosion control and aggregate sources).

*Applicability: Project wide.*

*Applicability: Suitable habitat (will be mapped for construction crews).*

- **AMM BIO-13. Nesting Birds.** To avoid and minimize adverse effects to nesting birds, the following measures shall be implemented:

If work will occur during the nesting bird season (February 15 until August 31 OR January 1 until August 31 where there is potential for nesting eagles or other early nesting raptors), nesting bird surveys will be conducted within 7 days prior to the onset of construction by a Project biologist or biological monitor familiar with the species that may nest in the Action Area with standard nest-locating techniques. Surveys will occur to a distance of 100 feet (for passerines) or 300 feet (for raptors) from the proposed work, access routes, and staging areas. In areas within 0.5 mile of suitable bald or golden eagle nesting habitat, nesting season begins January 1 and surveys will be performed within 2,640 feet of work. If an active nest is encountered in or adjacent to a work area, a no equipment/no activity buffer will be implemented around the nest (the size of which will be determined by the Project biologist and shall depend on the species' tolerance to human activity, location of the nest relative to the work area, any vegetation or other materials that may screen the nest from noise and view of work, the nature of the work, and other pertinent information), OR the active nest will be continuously monitored by a Project biologist or biological monitor for disturbance. If the monitoring biologist determines nesting may fail as a result of work activities, all work shall cease (except access along existing roadways) within the recommended avoidance area until the biologist determines the adults and young are no longer reliant on the nest site. If an active nest of a listed bird is found, a 500-foot buffer will be established around the nest. If construction activities are delayed or suspended for more than 1 week after the completion of the nesting surveys, surveys will be performed again.

If active nests are identified on bridges or associated structures by a Project biologist or biological monitor during the nesting season (February 15 to August 31), work will not occur unless a biological monitor is present to monitor for disturbance. If active nests are identified on Caltrans bridges, Caltrans Environmental will be contacted.

If work will occur on Segment 8 between January 1 and August 31, crews will contact a Six Rivers National Forest biologist 2 weeks prior to the start of work to get updated nesting information for bald eagle.

*Applicability: Project wide.*

- **AMM BIO-14. Aquatic Resources / Fisheries.** To avoid and minimize adverse effects to federally-listed and special-status fish and wildlife, the following measures shall be implemented:
  - Avoid disruption of natural hydrologic flow paths, including diversion of streamflow and interception of surface and subsurface flow.
  - Conduct operations at water source developments in such a manner and timing as to avoid and minimize adverse effects to aquatic species and habitat from sedimentation.
  - No trenching or plowing activities are proposed to occur within perennial aquatic habitats. Perennial waterways will be crossed via one of three methods: 1) conduit attachment to existing bridge, 2) trenching to place conduit above a deep culvert, or 3) HDD.
  - For all trenching or plowing in intermittent and ephemeral streams, ground disturbance and sidecasting of excavated material will be done in a manner that will minimize potential for off-site sediment input into stream channels. In addition, these waterways will be restored and maintained in accordance with the SWPPP, Restoration Plan, and

any applicable agency permit requirements which aim to minimize any loose material from entering and remove any loose material that does enter dry channels.

- On USFS lands, coordinate with USFS fisheries biologists to restrict ground disturbance and sidesteering of excavated material to minimize potential for off-site sediment input into stream channels. Work within ephemeral and intermittent aquatic habitat or delineated wetlands will be coordinated with USFS fisheries biologists. ○ To avoid potential impacts to Upper Klamath/Trinity spring-run Chinook salmon, work will only occur during a LOP from November through April at all intermittent and perennial waterway crossings within the range of this population. This LOP applies to HDD work, not aerial or bridge crossings, and will be in effect at the following locations:

Primary alignment: Segments 7, 9, 11A, 13, 14A, 17, 18, 19, 20, 21, 22

Alternative segments: Segments 11, 14, 15, 15A, 15Alt, 16, 18A1, 18A2

- From May through October, HDD may cross intermittent waterways only if no water is present in the channel within 100 feet of the crossing, as the lack of aquatic habitat will ensure that Upper Klamath/Trinity spring-run Chinook salmon will not be present and not susceptible to disturbance. A biologist will survey the crossing within 48 hours prior to work to verify the channel is dry. Perennial waterways are anticipated to hold water year-round and may only be crossed during the November-April LOP.

*Applicability: Suitable habitat (will be mapped for construction crews).*

- **AMM BIO-15. Special-Status Amphibians.** When ground-disturbing work is occurring within 100 feet of waterways that have water present and that are suitable habitat for special-status amphibians, a qualified biologist will conduct a pre-disturbance survey for special-status amphibians (adults, subadults, tadpoles, or egg masses). The survey area will include suitable habitat within 100 feet of perennial and intermittent waterways, within 25 feet of ephemeral drainages, and at least 100 feet upstream and downstream of the work area. The biologist will conduct surveys for special-status amphibians prior to the start of ground-disturbing activities. If no special-status amphibians are detected, work may resume for 3 to 5 days before new surveys need to be conducted.

If a special-status amphibian is confirmed to be present, then a qualified biologist will move the individual to a suitable off-site location within the same waterway.

*Applicability: Suitable habitat (will be mapped for construction crews).*

- **AMM BIO-16. Special-Status Bats.** To avoid and minimize adverse effects to bats, the following measures shall be implemented:
  - When work will occur during bat maternity (April 1 to September 15) or hibernation (November 1 to February 28) seasons, suitable habitat (mines, caves, tunnels, buildings, other manmade structures, and trees with a DBH of 45 inches or larger) within 100 feet of work areas will be surveyed by a qualified biologist for suitable roost locations and signs of roosting bat colonies. If suitable roost locations, roosting bat colonies, or sign are detected within 100 feet of a work area, the Project biologist will contact the CDFW (or relevant agency) to determine the best course of action. Surveys must occur a minimum of 7 days prior to construction.
  - Prior to initiating conduit installation on any bridge, the Project biologist will conduct pre-disturbance bat roost surveys at the bridge site. If roosting bats may be present, then the Project biologist shall identify the species and contact the CDFW to determine the best course of action. Where bridges may serve as maternity roosts, Project construction will be delayed until conclusion of the maternity season.

*Applicability: All bridges and suitable habitat (will be mapped for construction crews).*

- **AMM BIO-17. *Special-Status Mammals.*** To avoid and minimize adverse effects to mammals, the following measures shall be implemented:
  - If work is being conducted in suitable denning habitat during the denning mammal natal season (February 1 to July 15), the Project biologist or biological monitor will conduct pre-disturbance denning mammal surveys at den sites within the construction corridor in addition to a 50-foot buffer area. If any potentially active dens are detected, a no-work buffer will be established within 150 feet of the potential den until the Project biologist determines that the den is not active or that denning season is over. Denning mammal surveys will focus on American badger, fisher, and ring-tailed cat with an emphasis on searching for tree cavities and burrows of appropriate size for these species in potentially suitable habitat. Methodology of covering the survey area will generally be via multiple transects within the Construction Corridor and buffer area, but this may vary depending on terrain, vegetation density, and visibility within the survey area. Surveys will focus on potentially high-disturbance locations along the alignment such as staging areas, excavations, and where construction will be done via trench/plow rather than HDD.
  - If a special-status denning mammal species is detected or directly observed within 150 feet of a construction area, the biological monitor will be notified immediately. Any work that may result in direct disturbance to the animal will be temporarily halted until the mammal leaves. If it does not leave on its own, the biological monitor would contact the appropriate agency to determine the best course of action.
  - Work within 0.25 mile of a known fisher den or unsurveyed dens will not occur between the fisher denning season (February 1 to July 15) unless surveys determine the site to be unoccupied. ○ Prior to the commencement of work in suitable habitat, the Project biologist will coordinate with the CDFW to obtain up-to-date information regarding wolf activity.

*Applicability: Suitable habitat (will be mapped for construction crews).*

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

Less Than Significant Impact: For a cultural resource to be considered a historical resource (i.e., eligible for listing in the California Register of Historical Resources [CRHR]), it generally must be 50 years or older. Under CEQA, historical resources can include precontact (i.e., Native American) archaeological deposits, Historic-period archaeological deposits, historic buildings, and historic districts.

Identification of historical resources in and adjacent to the Project included the following tasks: 1) records searches were conducted at the Northwest Information Center and Northeast Information Center of the California Historical Resources Information System, 2) geologic and historical maps and information were reviewed to assess the potential for Historic-period and precontact Native American archaeological deposits, and 3) qualified archaeologists surveyed the Project corridor to identify surface cultural resources.

The tasks described above identified a total of 251 cultural resources across the whole Digital 299 Project, including two resources in the vicinity of the Proposed Addition. This includes resources that are listed in, determined, or recommended eligible for the National Register of Historic Places (NRHP)/CRHR as well as those unevaluated and treated as eligible for the NRHP/CRHR for the purposes of this Project. The resources include prehistoric Native American sites; Historic-period trash dumps; Historic-period bridges and road segments; Historic-period mining remains and historic districts; a heritage tree of historical significance; and state historic landmarks, including Helena Townsite and Shasta State Historic Park.

To protect and limit impacts to historical resources in the Project corridor, including those that are assumed eligible for listing in the CRHR, BMPs and site-specific measures will be employed during construction. These include cultural resource awareness training for all construction crews prior to construction activities (**CR-1**), applicability of cultural resources guiding principles (**CR-2**), implementation of cultural resource protection measures included in the Cultural Resources Inventory Report with respect to known cultural environmentally sensitive areas (**CR-3**), application of BMPs during deviation from proposed construction methods and placement within the area of potential effect (APE) (**CR-4**), and avoidance of eligible or unevaluated cultural resources (**CR-5**). In addition, Inadvertent Discovery Protocols of cultural resources (**CR-6**) and human remains (**CR-7** and **CR-8**) requiring work to stop and the discovery to be flagged and assessed must be implemented as well. Resource protection measures requiring cultural avoidance measures be included in ILA building siting (**CR-9**) and construction (**CR-10**) are included as well.

These measures are prescribed project wide, or at specific sites along the Project, as described in Loftus et al. 2022 to avoid and limit impacts to cultural resources. Impacts to cultural resources resulting from unanticipated discovery—including their potential demolition, destruction, relocation, or alteration—would be less than significant and would be further minimized by the implementation of these measures.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

Less Than Significant Impact: According to the CEQA Guidelines, “When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource” (CEQA Guidelines Section 15064.5[c][1]). Those archaeological sites that do not qualify as historical resources shall be assessed to determine if these qualify as “unique archaeological resources” (CPRC Section 21083.2). Archaeological deposits identified during project construction shall be treated by the agency—in consultation with a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for Archeology—in accordance with the measures referenced under subsection a).

Project impacts will be less than significant and would be further minimized by the implementation of the below avoidance measures. The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

**c) Disturb any human remains, including those interred outside of dedicated cemeteries?**

Less Than Significant Impact: To avoid or minimize impacts to potential inadvertent discovery of human remains, the Project resource protection measures include unanticipated discovery protocols (**CR-7** and **CR-8**). These measures will ensure that if previously unknown human remains are discovered, including any interred within or outside of dedicated cemeteries, the protocols provided in CPRC Section 5097.98 would be followed. Impacts are considered less than significant and would be further minimized by the implementation of CR-7 and CR-8.

**Cultural and Tribal Resources Protection Measures**

- **CR-1. Cultural Resources Awareness Training.** Prior to ground- and non-ground-disturbing construction activities, all construction crew personnel will complete Cultural Resource Awareness Training (CRAT). The CRAT will educate the construction crew and personnel about Environmentally Sensitive Areas (ESAs), measures, BMPs, Cultural Resource Protection Measures (CRPMs), Inadvertent Discovery Protocols, types of resources to be aware of in the field (e.g., prehistoric, historic, human remains), and how to flag unanticipated discoveries. Additionally, the construction crew(s) will be educated on the federal and state regulations that provide for protection of cultural and tribal resources, such as the Archaeological Resources Protection Act (ARPA), as well as the penalties that result from violations. Similar CRAT will be provided to the cultural resources team of professionals responsible for the protection and preservation of cultural and tribal resources. This will ensure successful execution of the Project in compliance with Section 106 of the National Historic Preservation Act and CEQA. Implementation of the BMPs, CRPMs, Inadvertent Discovery Protocols, and CRAT will be overseen by the principal investigator and cultural lead. The CRAT must be repeated annually and as needed for new construction personnel and cultural resources personnel. All participants must sign an agreement stating they have completed the training.

*Applicability: Project wide, duration of Project.*

- **CR-2. Guiding Principles—CRPMs, BMPs, and IDP for Cultural and Tribal Resources.** The guiding principles cultural resource protection are an amalgamation of the guidance documents provided by each federal and state agency, to include:
  - State Protocol Agreement Among the California State Director of the BLM and the California State Historic Preservation Officer and the Nevada State Historic Preservation Officer regarding the Manner in Which the BLM Will Meet its Responsibilities under the National Historic Preservation Act and the National Programmatic Agreement among the BLM, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers
  - Nationwide Programmatic Agreement among the NPS, the Advisory Council on



- Historic Preservation, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act
- Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 ○ Bureau of Reclamation Protocol for NAGPRA Inadvertent Discoveries on Federal Land, California-Great Basin Region ○ Manual 8100-The Foundations for Managing Cultural Resources ○ Manual 8110-Identifying and Evaluating Cultural Resources ○ Manual 8140-Protecting Cultural Resources ○ Manual 8150-Permitting Uses of Cultural Resources
- Memorandum of Understanding Between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92 ○ Standard Environmental Reference-Volume 2, Chapter 2

*Applicability: Project wide, duration of Project.*

- **CR-3. Cultural Resource and ESA Avoidance and Management.** Vero shall implement the CRPMs with respect to known cultural resources and ESAs, as described in the Cultural Resources Inventory Report (Loftus et al. 2019).

*Applicability: Project wide, duration of Project.*

- **CR-4. Best Management Practice.** Prior to deviation for existing proposed construction method and cable placement location outside of the studied APE, Vero shall notify the appropriate jurisdictional authority to consult regarding the potential effects from the revised cable placement location to historical resources and historic properties.

*Applicability: Project wide, duration of Project.*

- **CR-5. Best Management Practice.** Vero shall avoid cultural resources, eligible or unevaluated for the NRHP/California Register of Historic Resources.

*Applicability: Project wide, duration of Project.*

- **CR-6. Inadvertent Discovery Protocol.** Should inadvertent discovery of cultural resources occur, Vero shall halt all ground-disturbing construction activity and flag the discovery for avoidance by 200 feet as an ESA, and a qualified archaeologist will be contacted for implementation of CRPMs, Treatment Plans, and potential mitigation measures in coordination with the jurisdictional agency and/or Tribal authority.

*Applicability: Project wide, duration of Project.*

- **CR-7. Inadvertent Discovery Protocol.** In the event that historic properties are inadvertently encountered, the vicinity of discovery will be flagged for avoidance from construction activities within 200 feet. Vero will be responsible for notifying the appropriate jurisdictional authority, and the agency shall notify the State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), federally recognized Indian Tribe(s) within 48 hours, or as soon as reasonably possible. The agency, in consultation with the SHPO/THPO, Indian Tribe(s), and Vero, will make reasonable efforts to avoid, minimize, or mitigate adverse effects on those historic properties. If human remains or other cultural material that may fall under the provisions of NAGPRA are present, the agency will comply with NAGPRA and ARPA. The agency will ensure that any human remains are left in situ, are not exposed, and remain protected while compliance with NAGPRA, ARPA, or other applicable federal, state, and/or local laws and procedures is undertaken.

Applicability: Project wide, duration of Project.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. ENERGY.</b> Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Result in a potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources?**

No impact: There would be no environmental impact due to wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Typical volumes of fuel would be utilized to operate machinery and vehicles. There is no aspect of the Project that could potentially result in a waste of resources.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

No impact: The Proposed Addition does not conflict with any renewable energy or energy efficiency plans.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS.</b> Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to the Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform

Building Code (1994), creating substantial direct or indirect risks to life or property?

e) Have soils incapable of adequately supporting the use of septic tanks or

alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

**a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?**

Less Than Significant Impact: The analysis area of the adopted Project includes a few mapped faults identified on the current Alquist-Priolo Earthquake Fault Zoning Maps as covered under the Alquist-Priolo Earthquake Fault Zoning Act. However, the Proposed Addition is more than fifty miles away from the nearest mapped fault.

The Project involves the construction of a buried conduit and fiber line that is at minimal risk due to rupture of an earthquake fault and does not represent a risk of injury or death due to fault rupture or strong seismic ground shaking.

Considering the nature of the Project facilities (i.e., their location poses no risk to human life), these risks are considered less than significant. People and structures would not be exposed to additional risk, as the insertion of a thin band of conduit within an already cut and filled roadbed is not anticipated to increase the risk of landslides or other geologic hazards.

**b) Result in substantial soil erosion or the loss of topsoil?**

Less Than Significant Impact: Typical Project construction involves the removal and replacement of a minimal amount of topsoil. These impacts are short term and minor and do not represent an appreciable potential loss of topsoil or a substantial risk of additional erosion. Soil would be removed, stored temporarily, and generally used to backfill the open trench. Although soil would be disturbed, the potential for soil erosion and loss of topsoil is less than significant. Erosion control BMPs will be placed according to the measures in **Appendix G** and the Project's Restoration Plan.

**c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Less Than Significant Impact: Project construction would not add any additional risk of instability and would occur within an already cut and filled roadbed. The Project construction includes the opening and backfilling of a narrow, shallow trench that has a negligible potential to result in on- or off-site landslide, subsidence, or collapse. The Proposed Addition is more than 100 miles away from recorded landslides on the California Landslide Inventory. The Proposed Addition is not at risk of landslide, so there is no risk to life; impacts would be less than significant.

**d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

No Impact: Potentially expansive, high-plasticity clays were not encountered near the surface at the Project area. Based on the plasticity index test results, the upper 5 feet of soil underlying the site generally have a low to moderate potential for shrink-swell behavior. These will have no impact on the Project.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No impact: The Proposed Addition does not propose any wastewater infrastructure or require the use of underground septic systems that would have an impact on soil resources.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?**

Less Than Significant Impact: The San Diego Natural History Museum prepared a Paleontological Resource Technical Report and found that the Project area intersects a region of complex Coast Ranges Geomorphic Province, the Klamath Mountains Geomorphic Province, and the Great Valley Geomorphic Province. Utilizing the USFS and BLM Potential Fossil Yield Classification System (PFYC), 29 geologic units within the geomorphic provinces were identified. Six are considered High Potential (PFYC 4) consisting of Pleistocene-age marine and non-marine deposits. Four are considered Moderate Potential (PFYC 3) consisting of Pleistocene-age and non-marine terrace deposits. Ground disturbance (bore pits) would occur in PFYC 3 and 4. The SDNHM determined that earthwork along certain segments of the alignment will almost certainly disturb geologic units assigned a PFYC ranking of 3 or 4, and thus may negatively impact paleontological resources.

A Paleontological Monitoring and Discovery Plan (PMDP) was developed to establish monitoring and discovery measures for unknown paleontological resources. The PMDP requires paleontological monitoring in PFYC 3 and 4, as described in the PMDP in **Appendix L**. Specifically, monitoring is recommended for construction in areas underlain by paleontologically sensitive geologic units (i.e., nonmarine terrace deposits, marine and nonmarine overlap deposits, and the Falor, Modesto, Riverbank, Red Bluff, Tehama, Weaverville, Galice, and Bragdon formations) and will involve earthwork that can be feasibly monitored (e.g., trenching; excavation of access vaults, bore pits, and bridge attachments; grading for node buildings). The evaluation included a 0.5-mile buffer around the proposed alignment of the adopted Project, so the Proposed Addition falls within the area previously classified as PFYC 4. Therefore, no further evaluation was necessary. Impacts to paleontological resources and unique geological features would be less than significant and would be further minimized by monitoring and discovery measures outlined in the PMDP.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a) Generate greenhouse gas emissions, directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less than significant Impact: The Proposed Addition would emit greenhouse gases from the operation of vehicles and equipment during construction. The emissions are quantified in the EA. An estimated total of 14,500 metric tons of greenhouse gas as carbon dioxide (CO<sub>2</sub>) equivalent would be generated by the adopted Digital 299 Project over multiple years of construction, but the total greenhouses gases during

construction on the Proposed Addition would be negligible in comparison. The Shasta County Air Quality Management District does not have greenhouse gas CEQA thresholds or reporting thresholds for mobile source emissions. The stationary source emissions are not applicable to Project construction activities. While all greenhouse gases added to the atmosphere contribute incrementally to environmental effects, emission levels from Project construction are well under the minimum reporting thresholds. Emissions from on-going operations are negligible. Impacts are considered less than significant.

**b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

No impact: Project construction and operation does not exceed the thresholds established for reporting greenhouse gas emissions, nor is it a category required to report. There is no conflict with an applicable plan, policy, or regulation.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
a) Create a significant hazard to the public/environment through routine transport/use/disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk, loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Create significant hazard to the public/environment through routine transport/use/disposal of hazardous materials?**

Less than significant impact: During construction, gasoline, diesel fuels, and hydraulic fluid used in construction equipment would be present on the Project site. Resource protection measures **HZ-1** and **BIO-23** require the development of a SPPP and hazardous substance control and emergency response plan which are to be implemented for the duration of construction. The SPPP, further described in measure **BIO-23**, will include, at a minimum:

- Measures to ensure petroleum products are not discharged into drainages or bodies of water;
- A description of potentially hazardous and nonhazardous materials that could accidentally be spilled during construction (e.g., fuels, equipment lubricant, human waste and chemical toilets, and bentonite), potential spill sources, potential spill causes, proper storage and transport methods, spill containment, spill recovery, agency notification, and responsible parties;
- Proper hazardous material storage procedures in staging areas (i.e., hazardous materials shall be stored in staging areas that are located at least 100 feet from ephemeral and intermittent streams and 300 feet from perennial streams, lakes, and wetlands);
- Proper refueling and vehicle maintenance procedures near waters or wetlands (i.e., these types of activities shall be performed at least 100 feet from ephemeral and intermittent streams and 300 feet from perennial streams, lakes, and wetlands); and
- Other BMPs that will protect waters and wetlands from accidental spills (e.g., sedimentation fences, certified weed-free hay bales, sand bags, water bars, and baffles).

Unlike the adopted Project, the Proposed Addition would not have construction in work areas where soils are underlain by ultramafic rock (see Section 3.2.4.1 of the EA). Therefore, no AMMs will be needed to limit exposure to naturally occurring asbestos.

The transport, use, and disposal of these materials poses minimal risk or hazard to the surrounding environment. No other hazardous materials would be transported, used, or disposed of during construction or operation. Hazardous material-related impacts to the public and the environment are determined to be less than significant and would be further minimized by the measures described above.

***b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

Less Than Significant Impact: During construction, gasoline, diesel fuels, and hydraulic fluid used in construction equipment would be present on the Project site. Spills from construction equipment would be unlikely and minimal in volume; the overall risk is low. While there is a risk of these materials leaking or spilling into the environment, resource protection measures **HZ-1** and **BIO-23** include the development of a SPMP and hazardous substance control and emergency response plan which are to be implemented for the duration of construction. Both of these plans will include details on how to address hazardous materials spills and clean up surface contamination.

Impacts to the public and the environment are anticipated to be less than significant.

***c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?***

Less Than Significant Impact: Cottonwood Union Elementary School, West Cottonwood School, and North Cottonwood School are all located further than 0.25 miles from the Proposed Addition. Even if a school was located within 0.25 miles, the pollutants from construction equipment would not be acute but rather would be emitted for 2 to 3 days, as construction proceeds linearly. Pollutants are not considered hazardous at the minimal levels at which they would be emitted. The fuels used in construction equipment would be properly managed by the SWPPP and BMPs. Impacts are considered less than significant.

***d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would create a significant hazard to the public or the environment?***

No impact: No superfund sites are located within 5 miles of the Proposed Addition. There would be no impact.

**e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

No impact: No construction related to the Proposed Addition would take place within 2 miles of several public or public use airports. Vehicle traffic control plans and other BMPs would be implemented to manage traffic flow, and construction activities would pose no safety hazards for people residing or working near the Project area. The noise analysis in the EA (Section 3.8) shows that noise impacts from construction would be temporary and minor. The Project would not result in safety hazards or excessive noise for people residing or working in the Project area.

**f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than significant impact: During the operational phase, the Proposed Addition would not impair implementation or interfere with an adopted emergency response plan. During construction, traffic control plans and other BMPs listed in the EA would be implemented to manage traffic flow, including giving emergency vehicles immediate passage around and/or through construction sites. Impacts are considered less than significant.

**g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

Less than significant impact: The Proposed Addition poses a risk of wildfire only during construction from potential equipment sparks. Wildfire risks would be limited by implementing construction BMPs and applicable agency wildfire restrictions described in the Digital 299 Fire Prevention Plan, including that crews observe all fire alert warnings while working in areas prone to wildfires, keep all fire equipment (e.g., extinguishers, shovels, etc.) accessible at all times, and follow all other BMPs to respond to wildfires that could be caused by ignitions from sparks on vehicles and/or equipment. Workers would be trained on basic firefighting, and the availability of tools and training would allow construction crews to help control or extinguish fires they may come upon.

Once in place, the Project would increase communication capabilities allowing the public to have a better knowledge of wildfires and hazards. The Project would not expose significant risk, injury, or death related to wildfires; impacts would be less than significant.

### **Hazards and Hazardous Materials Protection Measures**

- **HZ-1. Spill Prevention.** Vero and the construction contractor will develop the following plans prior to construction:
  - Spill Prevention Plan, as described in measure BIO-23, to minimize potential for accidental spill or pollutant discharge
  - Hazardous Substance Control and Emergency Response Plan to provide protocol for managing hazardous substances during construction (e.g., refueling), and for responding to potential emergencies encountered in the field related to hazardous material.

*Applicability: SWPPP and spill prevention plan will be employed Project wide.*

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade the surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area,				
including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Violate any water quality standards or waste discharge requirements?**

Less than significant impact: The Proposed Addition could result in both direct and indirect, short-term, minor impacts to surface waters near the Project area. During construction activities, runoff from site improvements could result in a slight increase in turbidity and erosion due to runoff over disturbed soils. A number of resource protection measures are included that address these concerns, including the development and implementation of an SWPPP (**BIO-22** and **HYD-1**), implementation of erosion BMPs (**HYD-5**), and the development and implementation of an SPPP (**BIO-23** and **HZ-1**).

All applicable Clean Water Act Section 404 permits and Section 401 water quality certifications would be obtained prior to the commencement of construction activities, and the measures described above would ensure that water quality standards and waste discharge requirements would not be violated. The Proposed Addition will not cross any waterways not analyzed by the Final EA/ISMND and covered by the Clean Water Act Section 404 permits and Section 401 water quality certification.

*Frac-out Risk*

Frac-outs may occur when the pressure of the clay/water mixture is greater than the pressure of the surrounding ground/rock or when a pathway or crack opens in the ground that allows the mixture to seep out of the bore hole. Frac-out risk depends on a variety of factors, including ground conditions (e.g., soil type, erosion) and project design features (e.g., bore size and depth). Frac-outs are mostly likely to occur within 200 feet of the entry and exit pits, and in areas where ground has already been disturbed (Skonberg et al. 2008). This risk can be minimized or avoided by using proper tools and drilling practices, including monitoring drilling and pullback rates, monitoring returns into the entrance pit, and identifying any underground obstacles prior to construction (Tabesh et al. 2019).



Resource protection measures **HYD-2** and **BIO-24** require the Proponent to develop and implement an HDD Contingency Frac-Out Plan designating procedures, responsibilities, and reporting to be implemented in the event of a “frac-out” involving drilling fluid release when boring under perennial waterways. The Contingency Frac-Out Plan would include overarching BMPs as well as site-specific plans and designs for the above major waterways. Geotechnical studies involving the testing of soil and bore pits on either side of major HDD crossings would inform the slurry mix, further minimizing frac-out risk. General BMPs include but are not limited to keeping a vacuum and spill kit on-site, installing temporary sediment barriers, and storing spoils away from riparian boundaries when boring under waterways. Additionally, as described in the Plan, the HDD operation would be continually monitored for pressure changes or visual observations of seepage. Monitoring devices allow the crews to track the exact location of the drill bit, including depth, and detects pressure changes which may indicate a frac-out risk or occurrence. The Contingency Frac-Out Plan would incorporate agency input prior to the issuance of permits. The Plan will include the following:

- Monitoring procedures during drilling operations, (i.e., the bore path and waterways will be visually inspected at all times during drilling operations in the event of frac-outs);
- Clean-up and containment procedures in the event of accidental drilling fluid spills; • Detailed reporting procedures in the event of a drilling fluid release; and/or
- Specific response procedures in the event of a drilling fluid release.

Related measures require the inspection of the HDD drill path at all times (**HYD-3**) and the postconstruction restoration of any areas disturbed due to drilling or any other construction operation (**HYD-4**).

Overall, impacts to surface or groundwater quality are less than significant and would be further minimized by the implementation of measures described above.

***b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

No impact: The Proposed Addition would not remove groundwater or affect groundwater recharge. There would be no impact.

***c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?***

Less than significant impact: The Proposed Addition would not alter the existing drainage pattern of the area in any manner. The Addition is not expected to alter the course of a stream or river or add any impervious surfaces. Adherence to the erosion and stormwater BMPs during construction of the conduit would prevent substantial erosion and siltation from occurring on- and off-site. Any impacts would be less than significant.

***d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?***

No impact: The Proposed Addition is not within any flood hazard, tsunami, or seiche zones. There would be no impacts.

***e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

No impact: The Proposed Addition would not conflict with or obstruct implementation of a water quality control or sustainable groundwater management plan. There would be no impact.

### **Hydrology and Water Quality Protection Measures**

- **HYD-1. *Spill Prevention.*** A Spill Prevention Plan will be developed and implemented during construction, as described under BIO-23. The plan will contain spill prevention measures such as operation of equipment near water bodies, refueling operations, inspection of construction equipment for leaks, specific response procedures in the event of a spill, etc.
- **HYD-2. *HDD Contingency Frac-Out Plan.*** An HDD Contingency Frac-Out Plan will be developed and implemented during construction, as described under BIO-24. The Plan will designate procedures, responsibilities, and reporting in the event of a drilling fluid release.
- **HYD-3. *HDD Inspection.*** During HDD drilling, visual inspection along the bore path of the alignment shall take place at all times—i.e., a crew member should be watching closely for potential issues such as a spill or frac-out. At stream crossings with flowing water, the stream shall be monitored upstream and downstream of the crossing.
- **HYD-4. *Restoration.*** A Restoration Plan will be developed and implemented during construction, as described under BIO-3. The Plan will detail restoration of temporarily disturbed natural areas, including stream banks disturbed by construction. Pre-construction surveys will document conditions prior to construction. Exposed or disturbed areas, including channels and stream banks, shall be returned to pre-existing contours and conditions. Native seed mixes will be applied to disturbed areas and subsequent monitoring of sites requiring restoration will occur.
- **HYD-5. *Erosion BMPs.*** Runoff control structures, roadside diversion ditches, erosion-control structures, and energy dissipaters will be cleaned, maintained, repaired, and replaced to meet the standards set by applicable permits and the SWPPP.

**XI. LAND USE AND PLANNING.** Would the project:

- a) Physically divide an established community?
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

***a) Physically divide an established community?***

No impact: The Proposed Addition is located in established utility and transportation corridors and would not divide an established community. There would be no impact.

***b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

No impact: The Proposed Addition does not conflict with any land use plan, policy, or regulation, as conditioned by agency permits. There would be no impact.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>nt Issues</b>		Incorporated	Impact	Impact
<b>XII. MINERAL RESOURCES.</b> Would the project:		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?		<input type="checkbox"/>		

**a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?**

No impact: The Proposed Addition would have no effect on mineral resources.

***b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

No impact: The Proposed Addition would have no effect on mineral resources.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIII. NOISE.** Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?**

Less than significant impact: Construction of the Proposed Addition would require the use of large equipment to install the conduit, fiber optic line, and vaults, resulting in temporary noise impacts. Noise impacts from these activities would typically last no longer than 2 to 3 days at a single location and would be restricted to daytime hours. Construction noise modeling shows that all construction methods would generate noise of 88 A-weighted dB or less at 50 feet. Construction noise from these activities would drop off substantially at 200 feet and would be indistinguishable from background noise at a distance of less than 0.25 mile near populated areas. Because of the greater nuisance noise poses during nighttime hours, a resource protection measure has been added requiring the contractor to avoid construction during nighttime hours (**NOI-3**). To limit noise impacts further, resource protection measures have been added that the manufacturer's recommended noise abatement measures (e.g., mufflers, engine enclosures, etc.) are properly installed and in good condition (**NOI-1**). Additionally, equipment that is not imminently needed must be turned off to limit both noise and air quality impacts (**NOI-2**).

Due to the brevity of the impact limited to daylight hours, the noise would not be in excess of typical standards that apply to both long-term and "nuisance" noise. Short-term noise impacts are considered to be temporary, minor, and less than significant and would be further minimized by the implementation of the avoidance measures below.

The long-term operation of the Proposed Addition and Project are not anticipated to result in any substantial noise impacts. The fiber line itself is not a noise source. Any noise impact would be short term, minor, and would not exceed noise standards. Long-term noise impacts are considered to be less than significant.

**b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?**

Less than significant impact: Construction of the Proposed Addition would be completed with HDD. Therefore, the Addition would not result in any ground-borne vibration. No impact.

**c) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No impact: Construction of the Proposed Addition will not occur within an area within an airport land use plan or within two miles of a public airport. There would be no impact.

### **Noise Protection Measures**

- **NOI-1. *Equipment Noise Abatement Maintenance.*** Ensure that all construction equipment has the manufacturers' recommended noise abatement measures, such as mufflers and engine enclosures, and is intact, in good condition, and operational.

*Applicability: Project wide, for the duration of construction.*

- **NOI-2. *Equipment Idling.*** Turn off idling equipment that isn't imminently needed.

*Applicability: Project wide, for the duration of construction.*

- **NOI-3. *Construction Timing.*** Avoid construction during evening and nighttime hours (7:00 p.m. to 7:00 a.m.) and on weekends.

*Applicability: Project-wide, for the duration of construction.*

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XIV. POPULATION AND HOUSING.** Would the project:

a) Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?**

Less than significant impact: The Proposed Addition involves installation of a fiber optic cable to serve underserved areas and key “anchor” institutions. The Project responds to current need for underserved residents as well as planned growth under city and county plans. The Project addresses a gap in service and is not anticipated to induce substantial unplanned growth in any of the areas it would serve. Impacts are considered less than significant.

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No impact: The Proposed Addition would not displace any existing people or housing. No additional housing as a result of the fiber optic cable would be necessary. There would be no impacts.



Issues	Potentially Significant Impact	Less Than Significant No Impact	Less Than Significant with Mitigation Incorporated	Impact
	Impact	Impact	Impact	Impact
<b>XV. PUBLIC SERVICES.</b> Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services?**

No impact: The Proposed Addition would provide a new broadband utility service and would improve delivery of emergency services for police, fire, and emergency medical response by increasing access to internet services. The Project would also improve delivery of internet and communications services to schools, parks, and other public facilities. Overall impacts would be beneficial. There would be no adverse impacts.

**XVI. RECREATION.**

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical     deterioration of the facility would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical     effect on the environment?

**a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

No impact: The Proposed Addition would not create any additional recreational capacity and would not cause any increase in the usage of the recreational areas and facilities near it. Use of existing

Potentially Significant      Less Than Significant with Mitigation      Less Than Significant      No

Issues	Impact	Incorporated	Impact	Impact
recreational facilities would not increase as a result of this Proposed Addition, nor would there be any substantial physical deterioration of recreational facilities. There would be no impact.				

**b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No impact: The Proposed Addition does not include recreational activities or require the construction or expansion of recreational activities.

**XVII. TRANSPORTATION.** Would the project:

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?        | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Result in inadequate emergency access?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Less than significant impact: The installation of the fiber optic cable would not conflict with any program, plan, ordinance, or policy concerning traffic circulation systems. During construction, there may be brief periods when roads are subject to one-way controlled traffic. The construction contractor would be required to follow all requirements and regulations from approved permits and traffic control plans and provide standard signage, flaggers, and pilot cars where indicated on county roadways. With typical construction traffic control measures in place, impacts would be less than significant.

Impacts are considered less than significant and would be further minimized by the implementation of traffic control plans employed during construction.

**b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

No impact: The Proposed Addition is not expected to substantially increase vehicular travel. There may be a slight increase in vehicle miles travelled during construction, but the long-term impact of the Project would not increase the total miles travelled. The Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

**c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

Potentially Significant      Less Than Significant with Mitigation      Less Than Significant      No

Issues	Impact	Incorporated	Impact	Impact
--------	--------	--------------	--------	--------

Less than significant impact: The Proposed Addition does not include any design features or uses that would increase vehicular hazards. The presence of construction equipment and vehicles during construction is expected to result in increased traffic; however, the construction contractor would be required to follow all requirements and regulations from approved permits and traffic control plans and provide standard signage, flaggers, and pilot cars where indicated on state and county roadways. Impacts from construction would be less than significant, and there would be no long-term impacts.

**d) Result in inadequate emergency access?**

No impact: The Project would in no way block or impede emergency vehicles or personnel from fulfilling their purpose. Emergency vehicles would be given priority to access and/or cross construction sites at all times. Operation of the Proposed Addition would not result in any impacts on emergency access.

**XVIII. CULTURAL AND TRIBAL RESOURCES.** Would the project

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i) Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**a) Would the project cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: i) Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.**

Less than significant impact: The cultural resources inventory of the Proposed Addition did not identify any previously recorded or new tribal cultural resources.

		Less Than		
	Potentially	Significant	Less Than	
	Significant	with Mitigation	Significant	No



Issues	Impact	Incorporated	Impact	Impact
<p>However, precautionary cultural resource protection measures have been included to reduce the potential for impact. A Comprehensive Cultural Resource Awareness Training program would be implemented as a requirement for all construction personnel prior to the start of ground-disturbing construction activities (<b>CR-1</b>). The training would be repeated annually and as-needed for new construction and cultural resource personnel working on the Project and Proposed Addition.</p>				

Cultural resource guiding principles would be applied during Project construction (**CR-2**), and known cultural resources that are unevaluated and treated as eligible, recommended eligible, and determined eligible, would be avoided and managed via Recommended Actions included in the EA (**CR-3**, **CR-4**, and **CR-5**). Cultural resource protection measures shall be implemented and include avoidance via shifting cable placement to the opposite side of the road; hugging the edge of the road pavement to stay within the disturbed soils of the prism, thereby avoiding nearby resources; boring under cultural resources (e.g., culverts or railroad grades); siting vaults and bore pits outside of known resource boundaries; erecting temporary barricades and flagging resources for avoidance; and limiting use of machinery that has vibratory effects that might damage resources such as historic rock walls. Archaeological and tribal cultural monitoring of construction would be implemented at sensitive resource locations. Construction activities near TCPs, sacred sites, and seasonally important or ceremonial sites would only occur during acceptable times identified during ongoing Tribal consultation conducted for the Project.

The Project has the potential to disturb unknown resources, so resource protection measures have been included to address the impacts of inadvertent discovery (**CR-6**, **CR-7**, and **CR-8**). Impacts to unknown resources are unpredictable and would be reported and evaluated as much as is possible during construction. BMPs and Inadvertent Discovery Protocols would be implemented for the duration of the Project to minimize adverse impacts to unknown archaeological and Tribal resources.

Given the no adverse effects finding, precautionary measures employed during construction, and the absence of new visual elements to viewsheds, impacts would be less than significant.

### **Cultural and Tribal Resources Protection Measures**

- **CR-1. Cultural Resources Awareness Training.** Prior to ground- and non-ground-disturbing construction activities, all construction crew personnel will complete Cultural Resource Awareness Training (CRAT). The CRAT will educate the construction crew and personnel about Environmentally Sensitive Areas (ESAs), measures, BMPs, Cultural Resource Protection Measures (CRPMs), Inadvertent Discovery Protocols, types of resources to be aware of in the field (e.g., prehistoric, historic, human remains), and how to flag unanticipated discoveries. Additionally, the construction crew(s) will be educated on the federal and state regulations that provide for protection of cultural and tribal resources, such as the Archaeological Resources Protection Act (ARPA), as well as the penalties that result from violations. Similar CRAT will be provided to the cultural resources team of professionals responsible for the protection and preservation of cultural and tribal resources. This will ensure successful execution of the Project in compliance with Section 106 of the National Historic Preservation Act and CEQA. Implementation of the BMPs, CRPMs, Inadvertent Discovery Protocols, and CRAT will be overseen by the principal investigator and cultural lead. The CRAT must be repeated annually and as needed for new construction personnel and cultural resources personnel. All participants must sign an agreement stating they have completed the training.

*Applicability: Project wide, duration of Project.*

- **CR-2. Guiding Principles—CRPMs, BMPs, and IDP for Cultural and Tribal Resources.** The guiding principles cultural resource protection are an amalgamation of the guidance documents provided by each federal and state agency, to include:
  - State Protocol Agreement Among the California State Director of the BLM and the California State Historic Preservation Officer and the Nevada State Historic Preservation Officer regarding the Manner in Which the BLM Will Meet its Responsibilities under the National Historic Preservation Act and the National Programmatic Agreement among the BLM, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers
  - Nationwide Programmatic Agreement among the NPS, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act
  - Native American Graves Protection and Repatriation Act (NAGPRA) of 1990
  - Bureau of Reclamation Protocol for NAGPRA Inadvertent Discoveries on Federal Land, California-Great Basin Region
  - Manual 8100-The Foundations for Managing Cultural Resources
  - Manual 8110-Identifying and Evaluating Cultural Resources
  - Manual 8140-Protecting Cultural Resources
  - Manual 8150-Permitting Uses of Cultural Resources
  - Memorandum of Understanding Between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92
  - Standard Environmental Reference-Volume 2, Chapter 2

*Applicability: Project wide, duration of Project.*

- **CR-3. Cultural Resource and ESA Avoidance and Management.** Vero shall implement the CRPMs with respect to known cultural resources and ESAs, as described in the Cultural Resources Inventory Report (Loftus et al. 2019).

*Applicability: Project wide, duration of Project.*

- **CR-4. Best Management Practice.** Prior to deviation for existing proposed construction method and cable placement location outside of the studied APE, Vero shall notify the appropriate jurisdictional authority to consult regarding the potential effects from the revised cable placement location to historical resources and historic properties.

*Applicability: Project wide, duration of Project.*

- **CR-5. Best Management Practice.** Vero shall avoid cultural resources, eligible or unevaluated for the NRHP/California Register of Historic Resources.

*Applicability: Project wide, duration of Project.*

- **CR-6. Inadvertent Discovery Protocol.** Should inadvertent discovery of cultural resources occur, Vero shall halt all ground-disturbing construction activity and flag the discovery for avoidance by 200 feet as an ESA, and a qualified archaeologist will be contacted for implementation of CRPMs, Treatment Plans, and potential mitigation measures in coordination with the jurisdictional agency and/or Tribal authority.

*Applicability: Project wide, duration of Project.*

- **CR-7. Inadvertent Discovery Protocol.** In the event that historic properties are inadvertently encountered, the vicinity of discovery will be flagged for avoidance from construction activities within 200 feet. Vero will be responsible for notifying the appropriate jurisdictional authority, and the agency shall notify the State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), federally recognized Indian Tribe(s) within 48 hours, or as soon as reasonably possible. The agency, in consultation with the SHPO/THPO, Indian Tribe(s), and Vero, will make reasonable efforts to avoid, minimize, or mitigate adverse effects on those historic properties. If human remains or other cultural material that may fall under the provisions of NAGPRA are present, the agency will comply with NAGPRA and ARPA. The agency will ensure that any human remains are left in situ, are not exposed, and remain protected while compliance with NAGPRA, ARPA, or other applicable federal, state, and/or local laws and procedures is undertaken.

*Applicability: Project wide, duration of Project.*

- **CR-8. ILA Building Location.** ILA buildings will not be sited in areas of known sensitive cultural or tribal resources. Resource protection measures listed in this appendix will be followed during construction of ILA buildings.

*Applicability: During ILA building siting.*

	Potentially Significant Impact			
<b>XIX. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and				

Issues	Less Than			
	Significant Mitigation Incorporated	Significant	Less Than Impact	No Impact

reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less Than Significant: The Proposed Addition includes the development of a new telecommunications fiber line to serve underserved areas. Environmental effects of this development are analyzed in the Project EA/ISMND and effects of the Proposed Addition are analyzed in the IS. The effects are not expected to be significant. The Project would not require the location or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or natural gas. Impacts would be less than significant. Shasta County will be reviewing the engineering plans. If needed, the Proponent will adjust the proposed alignment as needed to avoid public utilities.

**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

No impact: The Proposed Addition would require a negligible amount of water during construction and would not have any impact on water supplies.

**c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No impact: The Proposed Addition would not generate wastewater or result in additional wastewater treatment needs. No additional demands for wastewater treatment would occur during construction or operation of the fiber optic line. There would be no impact.

**d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

No impact: The Proposed Addition would not generate solid waste in excess of state or local standards. Waste and/or debris generated by construction activities would be properly managed and disposed of. The Project would not result in waste in excess of local standards and would not impair solid waste reduction goals. There would be no impact.

**e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

No impact: Construction waste would be managed and disposed of at regional landfills. No solid waste would result from the long-term operation of the fiber optic line. To this end, all federal, state, and local solid waste management and reduction statutes and regulations would be adhered to throughout the Project. There would be no impact regarding solid waste reduction standards.



Issues	Potentially Significant Impact	Less Than	Less Than	with
		Significant Mitigation Incorporated	Significant Impact	No Impact

**XX.WILDFIRE.** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**e) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

No impact: The Proposed Addition would not substantially impair or impede emergency services from carrying out emergency response and/or evacuation plans. Emergency vehicles would be given priority to enter or cross construction sites at all times. There would be no impacts.

**f) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

Less than significant impact: The whole Project involves constructing a 300-mile fiber optic cable underground within already developed utility and transportation corridors, and the Proposed Addition involves construction approximately 1,400 feet of underground fiber optic cable. Vehicle or equipment sparks pose a minor risk of wildfire. To address fire risk, resource protection measures require Vero to develop a Fire Prevention Plan that includes training personnel about fire danger and the measures to take in the event of a fire as well as equipping all motor vehicles with fire prevention equipment, including shovels, water, and fire extinguishers. Construction crews would observe all fire alert warnings while working in areas prone to wildfires, would keep fire equipment accessible at all times, and would follow the Fire Prevention Plan. Impacts to fire risk would be less than significant and would be further minimized by the implementation of avoidance measures below and the Fire Prevention Plan.

**c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or on-going impacts to the environment?**

No impact: Fiber optic cables do not carry electricity and are not a source of heat or combustion. The Proposed Addition would not require the installation or maintenance of any infrastructure that would be expected to start a fire. No aerial conduit is proposed in this section of the Proposed Addition. Thus, there would be no impact.

**d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? No impact:**

The Proposed Addition would be built within already developed transportation and utility

corridors. Construction would not require any large-scale changes to slopes and roads that would result in additional instability and increase risk. There would be no impact.

**Public Health and Safety Protection Measures**

- **PH-1. Fire Prevention.** Vero and the construction contractor shall develop and implement a Fire Prevention Plan, which will include a training program for all personnel about the measures to take in the event of a fire including fire dangers, locations of extinguishers and equipment, emergency response, and individual responsibilities for fire prevention and suppression.

*Applicability: Project wide, for the duration of construction.*

- **PH-2. Fire Prevention.** All motor vehicles used during construction will carry specified fire prevention equipment including shovels, water, and fire extinguishers.

*Applicability: Project wide, for the duration of construction.*

*Applicability: During ILA building construction.*

- **PH-4. Naturally Occurring Asbestos.** In work areas where soils are underlain by ultramafic rock (see Section 3.2.4.1 of the EA), construction crews will implement the following AMMs to minimize the spread of dust and thereby minimize worker and public exposure to naturally occurring asbestos (NOA):

- Construction vehicle speed within the work site will be limited to 15 mph or less.
- Construction crews will install temporary wind barriers around the work site and/or limit excavation to periods of calm or low winds.
- Construction crews will use water to moisten excavation sites prior to ground disturbance and will keep those areas continually moist to minimize the spread of dust.
- Storage piles of excavated soil or rock will be wetted, treated with a chemical dust suppressant, or covered when not in use in order to minimize dust.

*Applicability: During construction in areas underlain by ultramafic rock.*

**XXI.MANDATORY FINDINGS OF SIGNIFICANCE.**

**Potentially Significant Impact**

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than  
 Significant Mitigation Incorporated    Less Than Significant Impact    No Significant Impact    with Significant Impact

Issues

a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to**

**drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

Less than Significant Impact: The Proposed Addition would not significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory (see BE and Biological Assessment). The Proposed Addition would not cross any perennial or dry waterways, and a biological survey in April 2023 did not identify any potential species status species habitat. Pre-construction vegetation survey would establish a baseline for restoration per the Restoration Plan (AMM BIO-3). Impacts would be less than significant.

b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)**

Less than Significant Impact: The Proposed Addition would not have any individually limited but cumulatively considerable impacts. Any impacts would be less than significant. See Section 3.11 of the EA for a full analysis of cumulative impacts.

c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less than Significant Impact: The Proposed Addition would not have any substantially adverse environmental effects on human beings, either directly or indirectly, that would jeopardize human health or quality of life. Any impacts would be less than significant.

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