Appendix A

County of Tuolumne Broadband Infrastructure Environmental Impact Report

Initial Study

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
BLM	Bureau of Land Management
BSL	Broadband Service Locations
CAL FIRE	California Department of Fire and Forestry
CEQA	California Environmental Quality Act
CCR	California Code Resource
County	Tuolumne County
DSL	digital subscriber line
EIR	Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
FRA	Federally Responsibility Area
GHG	greenhouse gases
LRA	Local Responsibility Area
Mbps	megabits per second
NOP	Notice of Preparation
NRHP	National Register of Historic Places
PEIR	Programmatic Environmental Impact Report
ROW	right-of-way
SMARA	Surface Mining and Reclamation Act of 1975
SRA	State Responsibility Area
VMT	vehicles miles traveled
WEAP	Worker Environmental Awareness Program

1.0 INTRODUCTION

The Initial Study addresses proposed improvements to the County of Tuolumne Broadband Infrastructure Environmental Impact Report Project (proposed project) by the project applicant, County of Tuolumne, and whether it may cause significant effects on the environment. The Initial Study has been prepared to satisfy the requirements of the California Environmental Quality Act (CEQA; Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). CEQA requires that State and local government agencies consider the environmental consequences of projects over which they have discretionary authority before they approve or implement those projects.

The Initial Study is a public document used by the decision-making Lead Agency to determine whether a project may have a significant effect on the environment. In the case of the proposed project, the County of Tuolumne (County) is the Lead Agency and will use the Initial Study to determine whether the proposed project has a significant effect on the environment.

This Initial Study relies on CEQA Guidelines Sections 15064 and 15064.4 in its determination of the significance of the environmental impacts. Per Section 15064, the finding as to whether a project may have one or more significant impacts shall be based on substantial evidence in the record, and that controversy alone, without substantial evidence of a significant impact, does not trigger the need for an Environmental Impact Report (EIR).

2.0 PROJECT BACKGROUND

Broadband provides high-speed internet access via multiple types of technologies, including fiber optics, wireless, cable, digital subscriber line (DSL), and satellite. While some areas of the County have sufficient internet speeds for daily work and home life, there are still large portions of the County with no coverage or coverage so slow that it has become prohibitive to perform daily, essential tasks.

The ability to provide broadband internet in the County has been challenging for a several reasons. Primarily, the topography and geography of the County present physical barriers to broadband connectivity. Subsurface rock throughout the County is difficult and expensive to trench while dense forests, hills, and canyons may obstruct the sight lines needed for wireless technology. Finally, the rural nature of the County results in low population densities to attract market-rate broadband infrastructure investors.

Currently, Tuolumne County has 13,826 Broadband Service Locations (BSL) (or 54 percent of all BSL within the County) that lack access to wireline broadband of speeds of up to 25/3 megabits per second (Mbps). Areas are considered “unserved” per the State of California definition of having less than 25/3 Mbps of service. These pockets of unserved, or even underserved, populations in California are missing out on what is now seen as a utility critical to quality of life. This Countywide project would help attract broadband infrastructure investors to bring broadband service to a County in need of reliable connectivity for increasing health and safety factors, as well as for economic and quality of life reasons. Expansion of broadband service and its associated infrastructure is vital to the various communities in the County for many reasons, which include but are not limited to:

- building social and community connections,
- enhancing civic engagement and participation,
- bolstering economic development and sustainability,
- increasing education and continuous learning,
- fostering health care and tele-health services, and
- promoting recreation and tourism.

3.0 PROJECT DESCRIPTION

3.1 Project Setting

Tuolumne County is located in the center of the California Mother Lode region, along the western slope of the Sierra Nevada mountains. Tuolumne County is bordered to the north by Alpine and Calaveras Counties, to the west by Calaveras and Stanislaus Counties, to the south by Merced and Mariposa Counties, and to the east by Mono County. Sonora is the only incorporated city within the County; however, there are other several unincorporated communities located throughout the County, such as Jamestown, Columbia, Tuolumne City, Groveland, and Twain Harte. Tuolumne County encompasses 2,274 total square miles, or 1,455,360 acres (County 2018).

3.2 Project Location

The proposed project would be located within Tuolumne County limits. The area in which future broadband infrastructure could be implemented includes all unincorporated areas of the County and the incorporated City of Sonora; it excludes federal lands, private roads, and state highway rights-of-way. The County has jurisdiction over a total of approximately 610 miles of County-maintained roads. It is envisioned that the vast majority of future broadband infrastructure would be installed within existing County-maintained roads and rights-of-way (ROW), public utility easements, and/or existing overhead public utility easements of record throughout the County. The exact alignment of future broadband infrastructure is currently unknown at this time and would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

3.3 Existing Facilities and Connection to Existing Facilities

The County currently has 32 miles of existing broadband infrastructure. The broadband infrastructure emanates from the incorporated City of Sonora and stretches north and southwest. Future broadband infrastructure improvements would likely stem from this existing network.

3.4 Proposed Facilities

The County is proposing to expand access to broadband technology throughout the County, including the unincorporated areas of the County and the one incorporated City of Sonora. The Countywide program would install fiber optic conduit either underground in buried conduits, overhead on pole lines, or in a combination of both. Broadband infrastructure would be installed to provide above ground or underground lateral connections to private residences and businesses. Individual connections typically would be located in previously-disturbed and/or developed areas (e.g., in ROW or public utility easements). The broadband infrastructure could follow other utility installations; therefore, it is likely that the ground along these alignments has been previously disturbed by prior utility work. Additionally, many of these connections would generally follow the route of the roadway, particularly if the applicable areas have other issues that could affect access, such as vegetation, geologic, landscape, and/or water features that should not be disturbed. This Initial Study conservatively assumes that new ground disturbance would be required for the entire program; however, there would be potential for utilizing existing conduit where only installation of fiber optic line would be required. If deemed feasible, the new broadband infrastructure constructed under an individual project or phase would connect to existing infrastructure in the project area supported by existing service providers.

The County includes a total of approximately 610 miles of County-maintained roads. The installation of underground or overhead cables would be located within existing County maintained road rights-of-way (ROW), public utility easements, and/or overhead public utility easements of record throughout the County. The future location of broadband infrastructure would focus on areas of the County that are currently unserved or underserved. The exact alignment of future broadband infrastructure is unknown at this time and would be based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

3.5 Project Construction

Construction Schedule

Construction of individual fiber projects under the broadband infrastructure program would begin as early as Spring 2024. Implementation of future individual fiber projects under the program would likely occur over many years. It is possible that multiple, individual fiber projects could have overlapping construction timeframes (or phases). Additionally, any individual segment could involve multiple construction crews working simultaneously, with plowing, trenching, and directional drilling occurring at the same time in different locations of the segment. Construction activities would typically occur between 7:00 a.m. and 6:00 p.m. on weekdays (or within the most restrictive hours for noise control purposes that may vary by jurisdiction). Construction activities are not envisioned to occur at night.

Construction Methods

The construction method used for future individual fiber projects would be determined based on the location, micro-site conditions, and constraints that may be present at an individual project site (e.g., size of road shoulder, water crossing, sensitive habitat, cultural resources, locations of existing buried utilities, etc.). Trees and other vegetation may be growing in road shoulders or otherwise along individual fiber alignments that could interfere with construction and would require removal. Typical hazardous materials (e.g., gasoline, oils, solvents, etc.) may be used during construction activities. If any existing wood utility poles are removed to accommodate installation, the poles would be properly disposed of as treated wood waste. For construction activities involving excavation, the excavated material would typically be re-used as fill material. In some cases, new fill material could be needed, and the specific amount would depend on the type and location of the construction activities. The following describes the construction methods that would be used to install fiber optic lines:

Horizontal Directional Drilling

Horizontal directional drilling (boring) allows new conduit to be installed to the desired depth with minimal surface disturbance along the alignment. Typical boring depths are up to 12-feet, depending on subsurface conditions and the need to avoid conflicts with existing utilities beneath roadway intersections. The exact boring depths would vary based on the individual fiber project.

Typically, a bore rig would drill towards the preceding buried access vaults, then be turned in the opposite direction and drilled to the succeeding access point (i.e., drilled from opposite directions to meet in the middle). Once the pilot bore string reaches its receiving pit, the conduit would be attached to the end. The pilot pipe would then be pulled back to the bore machine thereby installing the conduit. The conduits would be spliced together, or an access vault would be installed. Typical bore lengths are approximately 700-feet.

A temporary work area would be needed at the bore entry and exit pit locations to accommodate the bore rig, to allow for connection of the conduits, and for the installation of access vaults. These temporary work areas would be determined prior to or during construction of the individual fiber project. Water trucks are generally not required for dust suppression a horizontal directional drilling, the only activity that would involve appreciable soil excavation and stockpiles, would use directional bore rigs that have water on board that would be used for dust control, if necessary.

The bore rig would use a mixture of water and fine clay (usually bentonite) to help lubricate the pilot pipe and keep the hole drilled open. The water and clay would be mixed on-site in a mixer attached to or as part of the bore rig. Earth cuttings from the bore hole and the water/clay mixture returns to the bore entry pit where it would be pumped into a receiving tank. The mixture would be filtered for reuse if possible or stored in a tank until it could be discarded in a local landfill approved to receive the material. Drilling fluid is classified as non-toxic and can be disposed of accordingly. In areas of hard rock, the boring machine may use air and/or foam instead of drilling fluid.

Excavated or disturbed soil would be kept within a controlled area surrounded by a perimeter barrier that may entail silt fence, hay bales, straw wattles, or a similarly effective erosion control technique that prevents the transport of sediment from a given stockpile. All stockpiled material would be covered or contained in such a way that eliminates off-site sediment runoff from occurring. Upon completion of construction activities, excavated soil would be replaced.

Plowing

In unpaved areas, conduits could be installed using a plowing technique, in which a vibratory cable plow incises the soil to a depth typically 48-inches below the ground surface and the conduits are placed in the incised slit simultaneously. The exact soil depth would vary based on the individual fiber project. To accomplish this, as the vibratory cable plow parts the soil to lay the conduit, the conduits are laid down through a shaft attached to the plow, and then the soil reconsolidates immediately behind the plow. Plowing is generally performed using a tracked vehicle (i.e., bulldozer). The disturbance caused by the plow is typically restored within two days as part of the cleanup process.

In stable soils, the machines leave a track in the vegetation similar to, but wider than, a road vehicle. In wet or soft conditions, this disturbance may be great enough to require more extensive grading and reseeding to restore the area. When wet, soft, or restricted areas are anticipated, a “spider plow” may be used. This equipment has been specially developed for these conditions and causes much less disturbance because it runs on oversized rubber tires and is lower in weight.

Trenching

In areas where conditions are unsuitable for plowing (for example, if the soil matrix is characterized by a high density of rocks greater than 6-inches in diameter, or where existing underground infrastructure prohibits plowing) trenching would be needed to install the conduits. To create the conduit trench, a backhoe or other equipment is used to open a trench typically generally ranging from 9- to 18-inches wide and typically 48-inches deep. The exact width and depth would vary based on the individual fiber project. The conduit would be placed at the bottom of the trench, and the trench would be backfilled and compacted using trenching spoils, imported fill material or sand slurry as required. The trench is typically refilled the same day that it is created, and if a trench is left open at the end of the workday it is

covered in accordance with standard best management practices. In areas where the right-of-way or shoulder is very narrow or where sensitive biological or cultural resources must be avoided, or to accommodate a local jurisdiction's preference, the conduit may be installed by cutting pavement, excavating a narrow trench, and backfilling and repaving the cut pavement. In such circumstances, the trench would be backfilled with slurry to ensure proper compaction and pavement integrity.

Microtrenching

Future broadband could be installed using microtrenching for installation of subsurface pipe or conduit. Microtrenching could be used in paved areas or sidewalks. A microtrench is a narrow open excavation trench that would generally be 1- to 4-inches wide and 12-to 26-inches deep. The exact width and depth would vary based on the individual fiber project. A tractor with a microtrenching cutting blade or trencher would cut into pavement or a sidewalk. As trenching occurs, excavated material is collected by a vacuum excavator connected to the tractor or trencher. The microtrench would be backfilled with either a slurry or cement and a grout, epoxy, or other sealer.

Installation of Fiber Optic Line into Conduit

Once the conduit system is installed, the fiber optic line or microducts would be pulled or blown into the conduits in new or existing conduit. The installation would be accomplished using compressed air or a series of hydraulic pullers consisting of a main-line puller and sufficient intermediate assist pullers to ensure smooth pulling within specified tension restrictions. First, the pull line would be attached to a plug that is pushed through the conduit by air pressure. When the plug emerges at the end of the conduit section or access point, the pull line would be attached to the line through a swivel to prevent the line from twisting during the pulling operation. Then the pull line would be pulled back though the conduit section, threading the line through the conduit. The main-line puller would be equipped with a tension limiter and a tension monitor to provide an accurate record of actual pulling tensions encountered.

These methods would be used to pull the line from one handhole to the next. If there is damage to the conduit, it may be necessary to excavate temporary assist points to facilitate fiber installation. These could be required for a small number of vaults. Installation of fiber into existing conduits using these methods would not require any new ground disturbance—only access to existing buried vaults—and would require two vehicles and an air compressor.

Installation of Access Vaults

To allow for fiber optic line-placing assist locations, fiber optic line splice locations, and future access to the buried conduits and line, access vaults (also known as handholes, pull boxes, and splice boxes) could be placed along the alignment. Once installation is complete, the vaults would be accessed only rarely for maintenance or line replacement. Each vault would typically house 80- to 100-feet of line slack. The exact length of the link slack would vary based on the individual fiber project.

Each access vault would be equipped with a traffic-bearing cover, even if it would be out of the path of traffic. The cover may be visible at the surface or may be buried just below the surface. Generally, road shoulders or other easily accessible areas are the preferred locations for vaults. These vaults would be installed as the final step in the horizontal directional drill process and usually installed in the same excavations that had been used as drill entry and exit points. No additional ground disturbance would be

required for the vaults. Access vaults would typically be installed at midblock locations under the shoulder or beneath existing sidewalks.

Splicing of Fiber Optic Line Ends at Access Vaults

The reels of fiber optic line would be spliced where necessary at access vaults. Appropriate lengths of excess (slack loop) fiber optic line would be left at all splice locations to allow for line expansion and contraction due to temperature and for splicing required in the future. The line would be spliced in splice cases (i.e., protective encasements) in a line, with sufficient slack allowed. The splices would be made with a profile alignment fusion splicing machine and protected by heat-shrink tubing.

Aerial Stringing

In areas where trenching would be difficult for placing fiber optic line underground (e.g., rocky areas) and areas characterized by extreme topography (e.g., steep slopes, water crossings), fiber optic installation would occur using existing utility poles and/or new poles could be installed for aerial stringing of fiber optic line. Guy wires may be connected to the poles in areas that need additional stability. Self-supporting poles may be used where use of guy wires is infeasible (e.g., where there are existing structures next to the site) or where conditions prohibit adequate burial of the pole base or guy wire ground siting or anchorage.

3.6 Preconstruction Activities

Prior to construction, the program would develop and implement a Worker Environmental Awareness Program (WEAP) to educate workers about sensitive biological and cultural resources occurring in and near the project area as well as the potential for contamination in key areas. All field staff, including employees, contractors, and subcontractors who would work on the project site during construction would be required to participate in the WEAP program. The WEAP would inform workers about the locations and types of sensitive biological, cultural, and hazardous material resources potentially occurring in or near the proposed broadband infrastructure and would inform workers about policies, mitigation measures, and other protective features adopted as conditions of project approval (e.g., no ground-disturbing activities within 100-feet of sensitive biological resources) to avoid impacts to those resources. For hazardous materials, personnel would be informed that the Tuolumne County Environmental Health Department would be alerted to any suspected contamination. Staff would be informed of procedures for proper handling and disposal of hazardous wastes excavated in the construction process established by federal, State, and local regulations.

Surface Restoration

Site cleanup and surface restoration under the program would be performed promptly following conduit and line installation. Cleanup would include removing debris and restoring original surfacing and contours. Any disturbed areas would be returned to their original or better condition by replacing all asphalt, landscaping, or any earthen areas.

Construction Staging Areas and Equipment

Staging Areas

Staging areas would be established along public roadways or other existing disturbed areas along construction routes in the project area. If it is not possible to locate staging areas along roadways due to narrow roads or other constraints, the contractor would locate staging areas and equipment lay-down areas and storage areas in paved or graveled yards or other existing disturbed areas as close to the construction areas as possible. The exact locations of construction staging areas and equipment lay-down areas have not been determined and will be identified as part of the final construction plans for the proposed individual broadband projects. Locations would be selected by construction companies that would be awarded contracts for construction of individual segments. Crews would be mobilized from staging areas with no refueling occurring in the field. Any construction work, including use of staging areas, within County or incorporated city or town ROWs would be required to obtain an encroachment permit from the applicable jurisdiction.

All construction activity conducted along roadways would employ standard traffic control measures documented in a Traffic Control Plan submitted for review and approval by the Tuolumne County Public Works Department or the appropriate City of Sonora department for work within the limits of this incorporated jurisdiction.

Vehicles and Equipment

The types of construction vehicles and equipment that would be used during construction would vary depending on the type of installation occurring at any given location. In general, there would be five different construction activity types that could be conducted: trenching, directional drilling, fiber blowing, aerial fiber installation, and fiber splicing. The types of equipment that would be used include pickup/utility trucks, plows, trenchers, jackhammers, cutting blades, excavators with a rock saw or rock breaker, dump trucks, backhoes, boring rigs, and bucket trucks (for aerial installation). It is assumed that all locations of fiber installation are accessible by trucks and other construction equipment and that helicopter use would not be required. The types of equipment needed for a given project would vary depending on construction methods and site conditions.

3.7 Project Operations

Operational activities for any individual fiber projects implemented under the program would be limited to routine maintenance and emergencies.

3.8 Potential Permits and Approvals Required

The following actions would be required by Tuolumne County as the CEQA lead agency:

- certification of the appropriate CEQA document,
- adoption of a Mitigation Monitoring and Reporting Program, and
- adoption of CEQA findings.

Depending on the project-specific character, location, and construction techniques of future broadband, potential permits and approvals that could be required are identified in Table 1.

Table 1: Potential Permits and Approvals

Agency	Permits or Approvals
U.S. Army Corps of Engineers	• Nationwide Permit or Individual Permit under Section 404 of the Clean Water Act
U.S. Forest Service	• Construction easements
Central Valley Regional Water Quality Control Board	• National Pollutant Discharge Elimination Construction General Permit • Section 401 water quality certification or a waiver of discharge requirements
California Department of Fish and Wildlife	• Lake and streambed alteration agreement Section 1602 of the Fish and Game Code
City of Sonora	• Use permits, encroachment permits
County of Tuolumne	• Use permits, encroachment permits

4.0 PROJECT OBJECTIVES

The objectives of the program are to:

- provide upgradable and expandable high-speed broadband capacity in the service areas with minimum speeds of 25 megabits per second (Mbps) for downloads and 3 Mbps for uploads, which is labeled as “served” areas within California;
- provide a wireless broadband network in unserved and underserved areas of Tuolumne County;
- enable an increase in telecommuting, with a commensurate decrease in vehicle miles traveled;
- streamline the environmental review process for individual broadband projects that are implemented in the County;
- provide a reliable foundation of data and acceptable methodology to assess impacts for any specific broadband deployment project;
- identify known environmental and cultural assets to be protected and/or restored with an approved set of preservation measures and/or mitigations; and,
- save time and money for both the County of Tuolumne and broadband project applicants, resulting in greater government and economic efficiencies, reducing the amount of County staff time required to review broadband projects and avoiding duplication of applicant costs.

5.0 POTENTIAL ENVIRONMENTAL IMPACTS

As outlined in this Initial Study, a Program EIR (PEIR) will be prepared to assess the environmental, visual, and economic impacts associated with installation of new broadband infrastructure in Tuolumne County and to evaluate alternatives to determine the best approaches for avoiding, minimizing, and mitigating potential impacts. All CEQA environmental resource issues will be addressed in the PEIR unless otherwise indicated in this Initial Study; however, the level of analysis may vary based on the complexity of the issues, and the public and agency responses to the Notice of Preparation (NOP). Initial assumptions about the general environmental impacts to be addressed in the PEIR are provided in Section 8.I through 8.XX and incorporate pertinent information from the work completed to date.

6.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☒ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology and Soils	☒ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☒ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☒ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☒ Transportation	☒ Tribal Cultural Resources
☒ Utilities and Service Systems	☒ Wildfire	☒ Mandatory Findings of Significance

7.0 DETERMINATION

On the basis of this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project 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 project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect I) 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 is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project 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 project, nothing further is required.

Signature _____ Date _____

Printed Name _____ For _____

8.0 ENVIRONMENTAL INITIAL STUDY CHECKLIST

The lead agency has defined the column headings in the environmental checklist as follows:

A. "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.

B. "Less Than Significant with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." All mitigation measures are described, including a brief explanation of how the measures reduce the effect to a less than significant level. Mitigation measures from earlier analyses may be cross-referenced.

C. "Less Than Significant Impact" applies where the project does not create an impact that exceeds a stated significance threshold.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which 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).

The explanation of each issue identifies the significance criteria or threshold used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance. 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 [CEQA Guidelines Section 15063(c)(3)(D)]. Where appropriate, the discussion identifies the following:

a) Earlier Analyses Used. Identifies where earlier analyses are available for review.

b) Impacts Adequately Addressed. Identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states 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 Incorporated," describes 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.

I. AESTHETICS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a)	Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
c)	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?	☒	☐	☐	☐
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

Evaluation

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

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

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?

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

Potentially significant impact. The visual character within the County is predominantly rural, with dispersed small-town communities surrounded by open expanses consisting of agriculture, native vegetation, and low-density residential development. Natural features strongly contribute to this visual landscape. Roads and highways in Tuolumne County traverse areas of great scenic beauty, offering enjoyable experiences for passing motorists, cyclists, and hikers. Portions of State Routes (SR) 49, 108, and 120 are eligible for designation as State Scenic Highways (Caltrans 2023). Although, the County does not currently have any officially designated State Scenic Highways.

The proposed program would result in the consideration of placement of broadband infrastructure either underground in buried conduits, overhead on pole lines, or in a combination of both. The County

includes a total of approximately 610 miles of County-maintained roads. The installation of underground or overhead cables would be located within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County. Depending on the size and location of potential broadband infrastructure, they could be visually prominent and affect scenic vistas and scenic resources.

Aesthetic and visual resource impacts will be evaluated in the PEIR through written and graphic analysis. The PEIR will evaluate the potential for broadband infrastructure to create a substantial source of glare and/or lighting that could affect nearby uses, views of the surrounding areas, or aircraft operations. As appropriate, visual resources policies regarding broadband infrastructure would be incorporated and refined through the environmental review process. As alteration of visual character is considered a potentially significant impact, it will be further evaluated in the PEIR.

II. AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Evaluation

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))?

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

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?

Less than significant impact. Typically, agricultural land is considered under CEQA in terms of its designation as Important Farmland under the Farmland Mapping and Monitoring Program (FMMP),

which is maintained by the California Department of Conservation (CDC 2023a). However, mapping for the entire County has not been prepared. The County determined that approximately 120,000 acres of agricultural lands within County limits are protected in Williamson Act contracts (County 2018).

Based on the areas that have been mapped by the California Department of Conservation (CDC), the project area could potentially include small strips or plots of land that are designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, zoned for agricultural or forest land use, or be located under Williamson Act contract. However, because the Countywide program would be located within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County, construction, staging, and equipment lay-down areas of broadband infrastructure would not be sited on lands that are currently in agricultural production by the respective landowners. The program would consist of underground fiber optic lines and/or aboveground aerial stringing using existing or new utility poles in areas where trenching would be difficult. The fiber optic lines would not cross any U.S. Forest Service managed lands. The installation of broadband infrastructure would not interfere with the continuation of existing aboveground uses after construction is completed. Therefore, impacts on agricultural resources would be less than significant. This environmental topic area does not require further evaluation in the PEIR.

III. AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

Evaluation

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

Potentially significant impact. The PEIR will evaluate the short- and long-term sources of air pollutants that may result from broadband infrastructure and will evaluate consistency with regional and local air quality plans. Potentially significant impacts relating to air quality will be further evaluated in the PEIR.

IV. BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☒	☐	☐	☐
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?	☒	☐	☐	☐
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

Evaluation

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 Wildlife or U.S. Fish and Wildlife Service?

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

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?

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

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

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

Potentially significant impact. The PEIR will evaluate the proposed project at a programmatic level for impacts to biological resources, including potential impacts on vegetation communities, wildlife habitats, wildlife movement corridors, wetlands, and other waters of the U.S. and/or State, habitat conservation plans/protection ordinances, and sensitive and/or listed species. Potentially significant impacts relating to biological resources will be further evaluated in the PEIR.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☒	☐	☐	☐
b) 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?	☒	☐	☐	☐

Evaluation

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

b) 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?

Potentially significant impact. In Tuolumne County, there are 19 National Register of Historic Places (NRHP) listings, 12 listings on the County Register, and 20 California Historical Landmarks (County 2018). In honor of its historic resources, the federal government has named Tuolumne County a Preserve America Community, which recognizes the County's efforts to protect and celebrate its heritage, use historic assets for economic development and community revitalization, and encourage people to experience and appreciate local historic resources. The PEIR will evaluate the proposed project at a programmatic level and its potential impact on cultural resources within the County. Potentially significant impacts relating to cultural resources will be further evaluated in the PEIR.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Evaluation

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

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

Less than significant impact. The program would not generate additional energy demand beyond existing conditions within the project area, but rather seeks to improve the connectivity of rural communities in Tuolumne County through improved broadband access. The program would comprise multiple segments of new fiber optic lines throughout Tuolumne County, which would require the use of heavy-duty construction equipment. Energy would be consumed in the form of gasoline and diesel fuel to power this equipment and would be consumed in worker commute vehicles. However, this energy use would be inherently short-term and not substantial and would be a necessary energy expenditure to facilitate the expansion of Tuolumne County's broadband network, which could ultimately result in a decrease in gasoline consumption as rural workers are provided better telecommuting opportunities. Because the program would not induce new energy demand, would not conflict with a local or Statewide plan for renewable energy or energy efficiency, and would support better internet for telecommuting, resulting in a reduction in vehicles miles traveled (VMT) countywide, energy impacts from program implementation would be less than significant. This environmental topic area does not require further evaluation in the PEIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause 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?	☒	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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 waste water disposal systems where sewers are not available for the disposal of waste water?	☒	☐	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Evaluation

a) Directly or indirectly cause 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?

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

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?

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 waste water disposal systems where sewers are not available for the disposal of waste water?

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

Potentially significant impact. Tuolumne County is located approximately 12 miles east of the Foothills fault system and contains seismically active areas in which substantial ground shaking may occur (County 2018). The PEIR will assess soil and geologic conditions, and identify hazards related to seismic activity, including the potential for liquefaction, ground-shaking, and soil failure, as well as potential environmental effects related to soil stability and erosion potential. Potentially significant impacts relating to geology and soils will be further evaluated in the PEIR.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Evaluation

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

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

Potentially significant impact. The main source of greenhouse gas (GHG) emissions associated with the proposed broadband infrastructure would result from the combustion of fossil fuels during project construction. These emissions will be quantified using an acceptable methodology or model and will be evaluated consistent with CEQA requirements. Potentially significant impacts relating to greenhouse gases will be further evaluated in the PEIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
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?	☒	☐	☐	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?	☒	☐	☐	☐
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☒	☐	☐	☐

Evaluation

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

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?

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

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

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two 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?

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

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Potentially significant impact. The proposed broadband infrastructure will be evaluated at a programmatic level for the presence of hazards or hazardous conditions that could affect construction and operation of broadband projects, including the location of hazardous waste sites included in state and federal databases, airport and airstrip hazard zones, emergency response routes, and wildfire hazards. The PEIR will include a discussion of hazardous materials or operations associated with construction and operation of broadband infrastructure that may affect adjacent areas and their land uses. Potentially significant impacts relating to hazards and hazardous materials will be further evaluated in the PEIR.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐
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:				
i. Result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?	☒	☐	☐	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?	☒	☐	☐	☐
iv. Impede or redirect flood flows?	☒	☐	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☒	☐	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

Evaluation

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

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:

   i. Result in substantial erosion or siltation on- or off-site?
   ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?
   iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff?
   iv. Impede or redirect flood flows?

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

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

Potentially significant impact. Broadband infrastructure projects could impact existing drainage systems and surface water quality. The proposed program will be evaluated in the PEIR at a programmatic level for potential hydrology and water quality issues, including impacts to floodplains, surface water and ground water. Potentially significant impacts relating to hazards and hazardous materials will be further evaluated in the PEIR.

XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Physically divide an established community?	☐	☐	☒	☐
b)	Cause 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?	☐	☐	☒	☐

Evaluation

a) Physically divide an established community?

b) Cause 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?

Less than significant impact. The proposed project area would be located within Tuolumne County limits. The area in which future broadband infrastructure could be implemented includes all unincorporated areas of the County and the incorporated City of Sonora; it excludes federal lands, private roads, and highway rights-of-ways. The County includes a total of approximately 610 miles of County-maintained roads. The future broadband would be installed within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County. Future broadband would be placed within areas of the County that are currently unserved or underserved. The exact alignment of future broadband infrastructure is currently unknown at this time and would be based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

There are various general plan land use designations and zoning designations within County limits. Public roads are currently designated in City and County general plans, zoning codes, and ordinances to accommodate utility infrastructure. Although some temporary construction-related traffic disturbances could occur, the proposed program would not permanently divide an established community. Potential traffic will be evaluated in Section 8. XVII. Transportation. The proposed broadband would be used to connect communities that are currently unserved or underserved. Prior to issuance of use permits, grading, and/or encroachment permits by Tuolumne County and City of Sonora, the proposed program would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances. Impacts related to land use and planning would be less than significant. This environmental topic area does not require further evaluation in the PEIR.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Evaluation

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

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?

Less than significant impact. The County includes a total of six (6) mines and three (3) Surface Mining and Reclamation Act of 1975 (SMARA) mineral land classification studies according to the CDC Division of Mine Reclamation (CDC 2023b). However, because the project would be located within existing County maintained road ROW, public utility easements, or overhead public utility easements of record throughout the County, construction, staging, and equipment lay-down areas of broadband infrastructure would not interfere with the existing mines or mineral land classification studies. Additionally, geology and mineral resources would be assessed in Section 8.VII Geology and Soils. Therefore, impacts on minerals resources would be less than significant. This environmental topic area does not require further evaluation in the PEIR.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
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 two 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?	☒	☐	☐	☐

Evaluation

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?

b) Generation of excessive groundborne vibration or groundborne noise levels?

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 two 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?

Potentially significant impact. The PEIR will identify potentially noise sensitive areas and will identify potential noise impacts (including vibration) to those noise sensitive areas. The operation of heavy-duty equipment and other construction activities would generate potentially significant noise levels during the construction phase. Noise as a result of operation and maintenance activities, including noise resulting from increased transportation during operation of the facilities, will be considered. Potentially significant impacts relating to noise will be further evaluated in the PEIR.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

Evaluation

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

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

Less than significant impact. The proposed program does not involve constructing housing and, thus, would not contribute to unplanned growth. Instead, the program would include installation of broadband infrastructure within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County. The program would not displace people or housing, as it would improve broadband within areas of the County that are currently unserved or underserved. The potential for the program to have indirect growth inducing effects will be addressed in other sections of the PEIR. Therefore, the proposed program would have a less than significant impact on population and housing. This environmental topic area does not require further evaluation in the PEIR.

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Evaluation

a) Fire protection?

b) Police protection?

c) Schools?

d) Parks?

e) Other public facilities?

Less than significant impact. Tuolumne County currently receives structural fire protection from the Tuolumne Fire Department and wildfire protection from the State of California Forestry and Fire Protection Department. The proposed project would comply with the Tuolumne Fire District ordinances regarding access and wildland fire protection. The potential for a minor increase in demand for fire services may occur during construction or maintenance of the future broadband infrastructure. These minor public service demands would not overburden the Tuolumne Fire Department and no mitigation measures are proposed or warranted; the impact is less than significant.

Police protection services within the County would continue to be provided by the Sonora Police Department. The potential for a minor increase in demand for services may occur for police protection provided by the Sonora Police Department if a crime or accident occurs during construction or maintenance of the future broadband infrastructure. These minor public service demands would not overburden the Sonora Police Department; the impact is less than significant.

The proposed project would not generate any additional residential population that would create demand for additional schools or increase attendance or enrollment at existing schools. Additionally, the proposed project is not expected to increase use of or demand for parks within the County. The proposed project would have a less than significant impact. This environmental topic area does not require further evaluation in the PEIR.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?	☐	☐	☒	☐

Evaluation

a) 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?

Less than significant impact. The County is proposing to expand access to broadband technology throughout the County. The proposed program would not contribute to unplanned growth and would not include new housing. Therefore, the program would not increase the use of existing recreational facilities or demand for new recreational facilities that would adversely affect the environment. The program would have a less than significant impact on recreation. This environmental topic area does not require further evaluation in the PEIR.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d) Result in inadequate emergency access?	☒	☐	☐	☐

Evaluation

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

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

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

d) Result in inadequate emergency access?

Potentially significant impact. The PEIR will identify potential impacts to traffic and circulation as a result of construction and operation traffic resulting from broadband infrastructure. Development could impact local roadways, intersections, and safety, as a result of roadway expansions or other improvements to accommodate the program and its associated traffic. The PEIR will evaluate impacts to traffic and circulation at a programmatic level, including potential access points for site development, trip generation factors, and traffic distribution routes (including large truck/construction traffic routes). Potentially significant impacts relating to transportation will be further evaluated in the PEIR.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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, 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 California Register of Historical Resources, 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.	☒	☐	☐	☐

Evaluation

a) 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, 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 California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

   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?

Potentially significant impact. Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places and objects, with cultural value to a tribe. The topic of tribal cultural resources and Assembly Bill (AB) 52 will be discussed in the PEIR. Potentially significant impacts relating to tribal cultural resources will be further evaluated in the PEIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

Evaluation

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?

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

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?

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?

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

Potentially significant impact. The proposed broadband infrastructure may result in short- and long-term impacts on utilities and service systems to accommodate increased employment for construction and operations of the development, as well as meeting the utility and service needs of the facilities themselves. The PEIR will evaluate at a programmatic level the potential impacts of the proposed program relative to energy use, water supply, wastewater collection, treatment and disposal, and solid waste collection and disposal. Potentially significant impacts relating to utilities and service systems will be further evaluated in the PEIR.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐

Evaluation

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

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?

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?

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?

Potentially significant impact. The program would primarily involve installing underground fiber optic cables and/or aboveground aerial stringing of fiber optic cables along new or existing poles. Broadband infrastructure would be located primarily within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County. The program would not result in any alterations to slope, wind, or other factors that could exacerbate wildfire risks. The areas of construction in the program area would be cleaned up and the surface restored promptly

following conduit and line installation. Cleanup would include removing debris and restoring original surfacing and contours.

However, according to the California Department of Fire and Forestry (CAL FIRE) Fire Hazard Severity Zone (FHSZ) Map, areas of the County are mapped as “Very High” within Local Responsibility Areas (LRA) and State Responsibility Areas (SRA) (CAL FIRE 2023). The County includes mapped Federally Responsibility Areas (FRA), LRA, and SRA. As areas within Tuolumne County are highly susceptible to wildfires due to its “Very High” FHSZ rating, installation and operation of the proposed program may exacerbate a fire risk. Potentially significant impacts relating to wildfires will be further evaluated in the PEIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No 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?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of past, present and probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Evaluation

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?

Potentially significant impact. As discussed in Section 8.IV, 8.V, and 8.XVIII, implementation of the proposed program would have the potential to degrade the quality of the environment, and reduce the habitat of a protected plant and/or animal species. Potentially significant impacts to biological resources, cultural resources, and tribal cultural resources will be further evaluated in the PEIR.

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

Potentially significant impact. Implementation of the proposed program could contribute to cumulatively considerable impacts. Potentially significant impacts are discussed throughout this Initial Study and will be evaluated further in the PEIR.

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

Potentially significant impact. Environmental effects that may cause a potentially significant impact on human beings, either directly or indirectly, will be evaluated further in the PEIR.

9.0 REFERENCES

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10.0 PREPARERS

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