Appendix A – No. 10

PROPONENT'S ENVIRONMENTAL ASSESSMENT
ENVIRONMENTAL CHECKLIST

Site name: Cuesta Grade Workaround

Prepared for
California Public Utilities Commission

Prepared by
Level 3 Communications, LLC

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ENVIRONMENTAL CHECKLIST

1. Facility Title:
Level 3 Long-Haul Network, Cuesta Grade Workaround

2. Lead Agency Name and Address:
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102
(415) 703-2782

3. Contact Person and Phone Number:
Bill Vander Lyn, Level 3 Communications
6689 Owens Drive, Suite A, Pleasanton, CA 94588
(925) 398-3040

4. Facility Location:
The site is located northeast of the city of San Luis Obispo in an unincorporated portion of San Luis Obispo County. The site is an easement 20 feet wide and approximately 5.6 miles long, adjacent to a utility pipeline easement. The workaround route will start at the intersection of Miossi Road and Loomis Street, head in a northeasterly direction, and end where the route rejoins the UPRR ROW on the north side of Cuesta Pass. (See Figure 1, Regional Map; Figure 2, Vicinity Map; Figure 3, Parcel Map; and Figure 4, U.S.G.S. Quad.. Figure 5, Surrounding Land Use Map, and Photos A-C show the site from the vantage points identified in Figure 6).

5. Proponent's Name and Address:
Level 3 Communications, LLC ("Level 3")
1450 Infinite Drive, Louisville, CO 80027 (303) 926-3000

6. General Plan Designation: Agriculture and Rural Lands

7. Zoning: Agriculture and Rural Lands

8. Description of Facility:
This checklist evaluates the Cuesta Grade Workaround that would be constructed outside of existing utility corridors in support of the Long-Haul network. The workaround is required due to UPRR tunnels along this section of the fiber optic network and the absence of other utility corridors along part of the route. The workaround is within the scope of this PEA because some of the streets and rural areas along the alignment are outside utility corridors.

The Cuesta Grade Workaround route begins where the fiber optic running line leaves the existing utility corridor, at the intersection of Miossi Road and Loomis Street in the City of San Luis Obispo. At this point, the utility corridor ends and the running line enters private property. The workaround runs in a northeasterly direction adjacent to a utility pipeline easement until it intersects with SR-101. At this point, the workaround will be bored approximately 2,100 feet under private property to the intersection of SR-101 and Old Stage Coach Road. From this point, the workaround proceeds north along Old Stage Coach Road to its intersection with SR-101 at the summit of Cuesta Pass. From here the workaround route bores across the summit of Cuesta Pass and proceeds approximately 1200 feet to Cuesta Springs Road. The route then turns west down Cuesta Springs Road for approximately 2400 feet, where is crosses under a SR-101 overpass. Here the running line re-enters the Union Pacific Railroad (UPRR) right-of-way (ROW) to proceed to the city of Atascadero and points north. (See Figure 1, Regional Map, Figure 2, Vicinity Map, Figure 3, Parcel Map, and Figure 4, U.S.G.S. Quad). An alternative to the upper portion of the Old Stage Coach Road route would be along Padre Road, a private unpaved road (Figure 4). This alternate route is located to the east between San Luis Obispo

Creek and Highway 101. It would proceed north through the intersection of Old Stage Coach Road and Padre Road and continue north along Padre Road to where once again it intersects with Old Stagecoach Road at the summit of Cuesta Pass where the bore through the summit begins. The total length of this alternate route is approximately 1 mile. Figure 5 shows the surrounding land uses, while Photos A-C show the site from the vantage points identified in Figures 6. The total length of the workaround is approximately 5.6 miles.

The distance of the closest air/noise receptor to the Workaround is approximately 20 feet on the west end (a park), while the closest residence is approximately 50 feet from the workaround route along Cuesta Springs Road.

Site development begins with required preconstruction surveys as required to mark environmentally sensitive areas for avoidance. One hundred meter buffer zones or setbacks will be established between the construction zone and riparian areas, except where a stream must be crossed. As required, brush will be cleared and the area of cable placement will be grubbed. A 20 foot-wide construction area will be defined.

The fiber optic cable will be installed along the workaround by plowing, trenching, or directional boring to a depth of approximately five feet and a width of one foot. The specific technique will vary depending upon site conditions. A "spider" plow may be used when wet, soft, or restricted areas are encountered. After the innerduct is buried, usually with 42 inches of cover, the fiber optic cable is pulled through the innerduct and spliced at regularly spaced handholes. Handholes are round structures approximately 36 inches in diameter made of concrete and fiberglass composite, and are used to house splices and provide access to the fiber cable for maintenance. These handholes result in minimal environmental disturbance. Handhole structures will be buried approximately 6 to 24 inches below the ground surface or the top of the cover may be set at grade. They will be located approximately every 3,600 feet along the ROW.

As part of the cleanup process, the disturbed soil surface will be restored (e.g., regraded to original slope) within two days and revegetated. If open trenching is required, select, compacted fill will be placed in the trench prior to regrading and revegetation. In areas where erosion control is required by local agencies due to topographical or hydrological conditions, site-appropriate measures will be incorporated into a Stormwater Pollution Prevention Plans (SWPPP). These measures may include use of devises such as straw bales or fiber mats for temporary erosion-control impacts and/or erosion-controlling plant materials native to the local areas to preclude long-term erosion. Where necessary to ensure establishment of erosion-controlling plant materials, a temporary irrigation system will be installed or periodic watering by water trucks will be used. The appropriate Regional Water Quality Control Board will approve erosion-control measures in each SWPPP.

Except for the occasional inspection visit, Level 3 anticipates negligible maintenance activities on the workarounds once a native vegetation cover has been established. There are no other operation-phase activities associated with the workaround. No utilities will be required for either construction or operation of the workaround.

Level 3 will fully compensate a grantor of an easement for any damage or injury done to livestock, growing crops, improvements, structures, parking areas, landscaping, and other appurtenances and/or improvements in the course of construction and (minimal) maintenance of the workaround. Level 3 agrees that the easements, as well as any areas adjacent to, but outside the easements that are altered or damaged as a result of construction or maintenance by Level 3, shall be restored to their prior condition when work is completed. When the agreement ends, responsibilities for maintenance revert to the property owner.

Current and potential cumulative projects in the vicinity of the proposed Cuesta Grade Workaround (Table 1) are few in number, owing to the rural setting of the site. Projects listed in Table 1 meet the

following criteria:

- Projects within two miles of the site. In some cases these projects are in more than one jurisdiction;
- Projects which would be constructed within one year before and one year after the "construction window" for the Level 3 facilities, or between March 1999 to March 2003;
- For "current projects," projects which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified; and
- For "potential projects," projects which have been formally submitted to the lead agency and which are defined well enough to discern where they are, what they are (type of land use), and how big they are (acres, dwelling units, square footage, etc.). Although these submitted but not approved projects are considered "speculative" under CEQA, they give an indication of potential future development around the facility site.

The Caltrans Highway 101 widening project is major and multiyear and located in close proximity to the workaround.

9. Surrounding Land Uses and Environmental Setting:

At the southern end of the site is Cuesta County Park, which contains a picnic area and playground equipment, an animal hospital and an animal exhibit area, and an administrative building. San Luis Obispo Creek runs through the park. Surrounding uses to the north, east, and west of the segment along Miossi Road, are gently rolling grazing lands. The area surrounding Old Stage Coach Road is mountainous with moderately dense vegetation, a few scattered rural residential homes occur at the southern end of the route along near Old Stage Coach Road. San Luis Obispo Creek runs along the east side of a portion of Old Stage Coach Road. The area surrounding the alternative alignment along Padre Road is similar to the Old Stage Coach Road surroundings, and is characterized by steep slopes. SR-101 is visible to the east on portions of the workaround. (See Figure 5, Surrounding Land Use Map). Photos A-C show the site from the vantage points identified in Figure 6 (Photo Key Map).

10. Other Agencies Whose Approval is Required:

The site is located within the jurisdiction of the County of San Luis Obispo. It is also located within San Luis Obispo County Air Pollution Control District (SLOCAPCD).

Specific local policies relevant to each of the sixteen environmental impact issue areas are provided in Table 2. When there are no relevant and applicable policies, this fact is stated with an explanation. Sources for the policies are provided at the end of the listing. San Luis Obispo County will require a Minor Use Permit to allow installation of the cable in the Cuesta Grade Workaround.

PROPONENT'S DETERMINATION

On the basis of this initial assessment, the proposed action would not have a significant effect on the environment because the Environmental Commitments described below would be incorporated into the design and construction of the facility. A Negative Declaration would apply to this facility.

Environmental Commitments

The proposed site is part of the project addressed in an Application for Modification of an existing Certificate of Public Convenience and Necessity (CPCN) (Decision 98-03-066). That CPCN Decision was supported by a Negative Declaration that included Mitigation Measures to be implemented in the construction and operation of the previously approved telecommunications facilities within existing utility rights-of-way. Level 3 has incorporated all mitigation measures outlined in the previous Decision into its design of the project addressed in this checklist. Therefore, the actions previously imposed as mitigation measures are now the

proponent's Environmental Commitments for the facility addressed herein. These Environmental Commitments include:

- Measures to avoid or minimize potential impacts to various resources;
- Commitment to obtain all required local, regional, state and federal approvals and permits required for construction and operation of the project;
- Coordination with local and resource management agencies;
- Notifications of adjacent property owners;
- Coordination with other utility projects in the area; and
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the Proponent's Environmental Assessment (PEA). The site-specific details of how the proponent will implement these Environmental Commitments are provided by resource in the checklist that follows this section.

Mitigation Measures

No Mitigation Measures are required for the Cuesta Grade Workaround. All potential impacts can be avoided or reduced to less-than-significant levels through implementation of the Proponent's Environmental Commitments.

ENVIRONMENTAL IMPACTS

I. AESTHETICS

Setting

The workaround route runs primarily through hilly grassland which has been substantially disturbed by cattle grazing. Remnants of scrub vegetation characterized by native upland plant species exist, as do wetland and riparian areas. The project site runs along Miossi Road, Old Stage Coach Road, Padre Road, and Cuesta Springs Road. Portions of the route are characterized by steep slopes and native vegetation.

The site is visible from surrounding uses, including SR-101, Cuesta County Park, an animal hospital, and scattered rural residences. Although the route where installation of the fiber optic cable will take place is visible from surrounding uses, the project will be installed in the ground and would not be visible during operation. During construction of the project, construction equipment and vehicles will be visible from surrounding uses (see Photos A, B, and C). There are no scenic highways near the project site.

Evaluation

a)	Would the project have a substantial adverse effect on a scenic vista?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The operation of the workaround includes no above-ground structures and would, therefore, have no impact on scenic vistas. Potential impacts to scenic vistas would be temporary construction-related impacts. At any specific location impacts would be less than significant, because the construction equipment would be continuously moving. It is estimated that the construction in this area would require less than two weeks for completion.

b)	Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The facility would not be visible from a scenic highway.

c)	Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The site is characterized by grazed grassland, steep slopes, and native vegetation. The operation of the workaround includes no above-ground structures and would, therefore, not substantially degrade the visual character or quality of the site. During construction, the cable placement equipment would be visible on the hillsides, resulting in a short-term adverse effect on the visual quality of the site. Because of the temporary nature of the impact, it is not considered significant.

d)	Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The operation of the workaround includes no above-ground structures and requires no lighting. Construction of the workaround will occur during the daytime and will not require lighting. No new sources of substantial light or glare are proposed.

II. AGRICULTURAL RESOURCES

Setting

The site is located in a rural area that is used primarily for agricultural purposes, with cattle grazing on the surrounding grasslands. The site is not located on Prime Farmland (California Department of Conservation, 1994), nor is it under a Williamson Act contract (Caruso, 1999).

Evaluation

a)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

b)	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not under a Williamson Act contract. Although the site is located within an agriculturally zoned area, the project will be permitted with a Minor Use Permit. Thus, there will be no conflict with the existing agricultural zoning.

c)	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The construction of the workaround would not result in growth-inducing effects nor other off-site changes to the environment that would result in the conversion of farmland to non-agricultural use.

III. AIR QUALITY

Construction of the Cuesta Grade Workaround will include installation of underground fiber optic cable in a trench approximately one foot wide and five feet deep. This workaround will be completed in hilly terrain; equipment access will be somewhat limited and, as a result, the construction grading area will be limited to an approximate 10-foot wide area.

The construction process will proceed in the following sequence of activities: surveying and potholing, boring and clearing, excavating, cable installation and splicing, handholing, marking, and site restoration. Construction methods used to excavate the trench will include plowing, trenching, and/or boring. Once installation is complete, either native soil or imported material will be used as backfill. All construction spoils, remaining installation materials, and miscellaneous litter will be removed for off-site disposal.

Table 3 provides detailed information on construction and operation activities contributing to emissions of criteria pollutants and generation of fugitive dust (i.e., particulate matter with aerodynamic diameter less than or equal to 10 micrometers, PM_{10}). Methodologies, algorithms, and assumptions associated with these activities and estimates of associated emissions are provided as Attachment A. Included in Table 3 are the following construction-related items:

- Estimate of one-way commuting distance (miles) that members of the construction crew will travel to the construction site and numbers of such trips;
- Size (in gross horsepower (hp)) and number of units of each type of equipment to be used at the construction site, along with the numbers of hours per day and days that each piece of equipment will operate; and
- Onroad vehicles (e.g., worker light truck) are represented in terms of number of trips per day, total number of trips, and number of one-way miles traveled.

Table 3 shows the emission factors and other parameters used to calculate exhaust emissions for diesel industrial engines and PM_{10} emissions associated with fugitive dust generation (U.S. Environmental Protection Agency, 1996). Also included in Table 3 are *de minimis* construction emission thresholds established by the San Luis Obispo County Air Pollution Control District (SLOCAPCD, 1995), which is responsible for management of air emissions in San Luis Obispo County. Emission thresholds are provided for NO_x, ROC, and PM_{10}; none exist for sulfur oxides (SO_x) and carbon monoxide (CO). Emission rates below these thresholds are less than significant.

Following construction, there will essentially be no operations along the workaround.

Setting

The project site is located along Cuesta Grade, which is approximately six miles north of the City of San Luis Obispo in San Luis Obispo County. Along much of its length, the workaround passes through uninhabited or very sparsely inhabited areas. The closest residences are approximately 50 feet away on the northeast end of the workaround; a park is 20 feet away from the southwest end of the workaround (Figure 7).

San Luis Obispo County is located within the South Central Coast Air Basin, which also includes Santa Barbara and Ventura counties. The South Central Coast Air Basin is currently designated as a nonattainment area for state ozone and PM_{10} standards (California EPA, 1998), but not for National Ambient Air Quality Standards.

According to monitoring data collected during the three-year period 1995 to 1997 at monitoring stations in San Luis Obispo County, maximum ozone concentrations rarely exceeded the national ozone standard (0.12 parts per million, one-hour average). However, the more stringent state ozone standard (0.09 parts per million; one-hour average) is exceeded an average of approximately 7 days per year (California EPA, 1996-1998). The ozone problem in San Luis Obispo County reflects emissions sources within the South Central

Coast Air Basin, but, under certain meteorological conditions, the ozone problem is significantly affected by the transport of pollutants from San Joaquin Valley Air Basin.

Based on PM_{10} data from the closest monitoring station, which is in the City of San Luis Obispo, ambient PM_{10} concentrations in the project vicinity do not approach the national 24-hour-average standard of 150 micrograms per cubic meter (μ/m^3) and rarely exceed (approximately two percent of the time) the more stringent state standard of 50 (μ/m^3) (California EPA, 1996 to 1998). The PM_{10} nonattainment in San Luis Obispo County is influenced by pollutant transport, but also by such local sources as travel over paved and unpaved roads, construction activities, and farming operations.

The California Clean Air Act requires plans to be developed for areas designated as nonattainment, except for the state PM_{10} standard. Such plans are to include strategies for attaining the standards. The current ozone "attainment" plan is the *1998 Clean Air Plan* (SLOCAPCD, 1998). This ozone plan is the second triennial update of the original ozone attainment plan, which was adopted in 1991 (the first triennial update was made in 1995). This plan relies on a set of emissions control measures, some of which are to be implemented at the state and federal levels. Generally, stationary source control measures are to be implemented by the air district, while mobile and area source control measures are to be implemented at the state level by the Air Resources Board and at the federal level by the U.S. Environmental Protection Agency (U.S. EPA).

Two relevant statewide mobile source control measures relate to construction equipment. First, the state has established specifications for all diesel fuel sold in California. Enforcement of the specifications is made on individual refiners. Second, the state has established emissions standards for off-road equipment; such standards are enforced on engine manufacturers.

The statewide ozone strategy calls for extending emissions standards to a wider set of equipment and a tightening of emissions standards for those currently regulated. Specifically, with respect to off-road industrial (diesel) equipment greater than 175 horsepower (including farm and construction equipment), the State of California will tighten the NO_x standard for new engines to 2.5 grams per brake-horsepower-hour beginning with the 2005 model year (California Environmental Protection Agency, 1994). U.S. EPA regulates emissions from engines on new farm and construction equipment less than 175 horsepower. The statewide strategy relies upon U.S. EPA to extend the NO_x standard cited above to new engines within that class by 2005. The State of California will phase-in emissions controls for gasoline-powered equipment between 25 and 175 horsepower (not including farm and construction equipment) beginning with model year 2000. The U.S. EPA will extend these emissions controls to new gasoline-powered farm and construction equipment within that class.

SLOCAPCD provides guidelines to lead agencies in determining whether a project would be likely to exceed an air quality standard or contribute substantially to an existing or projected exceedance. The CEQA-related emission thresholds for construction are shown in Table 3, below which potential impacts are judged to be insignificant. All are expressed on a daily basis in terms of pounds per day, except PM_{10}. For evaluating construction-phase air quality impacts, SLOCAPCD recommends use of emissions-based significance criteria of 185 pounds per day (lb/day) for ROG and NO_x, and 2.5 tons per quarter (tpq) of PM_{10} (SLOCAPCD, 1995). The PM_{10} threshold includes both engine exhaust and fugitive dust sources.

The District has translated these ROG and NO_X emissions-based criteria into the following construction-phase activity thresholds, which are to be used where detailed construction specifications are not known: 2,000 cubic yards per day or 50,000 cubic yards per quarter. For PM_{10}, the District considers that any project with a grading area greater than 4 acres of continuously worked area would exceed the 2.5 tons per quarter criterion (SLOCAPCD, 1995). Disturbance along the workaround will be primarily due to spider plowing. No grading activities are expected to occur along the workaround route.

Construction for the proposed project at this site would not continuously work an area greater than 4 acres, as described further in the checklist analyses. This will be achieved through two primary means:

- The graded area along the workaround will be limited to a 10-foot wide swath; and
- Fiber optic cable installation activities will be limited to a maximum advance of 2.5 miles per day.

The SLOCAPCD also provides guidance concerning potentially significant emissions. The proposed project would have essentially no air quality emissions associated with operation and maintenance of this underground cable; hence, operational-phase impacts are not addressed further.

Evaluation

a)	Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Estimates of site construction and resulting emissions are provided in Table 3. Emission rates associated with construction engine exhaust for all five pollutants are below regulatory thresholds (see Table 3 and the discussion under III(b) below). Operational emissions from an occasional vehicle inspection or maintenance visit are negligible, and hence, in compliance with the applicable air quality plan.

Given the small scale of the construction effort and its temporary nature, project construction will not significantly affect regional ozone concentrations. In that context, while mobile construction equipment will generate emissions of ozone precursors, NO_x and ROG, the applicable ozone plan anticipates that such mobile emissions sources would continue to be regulated at the state and federal level, rather than on a project-by-project basis at the local level. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan.

Fugitive PM_{10} emissions will vary from day to day, depending on the level and type of activity, the silt content of the soil, and the weather. These emissions are shown in Table 3, are not subject to numerical limits, and hence, are less than significant.

b)	Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

As discussed above, the project site lies in an area designated as "nonattainment" for the state ambient air quality standards for ozone and PM_{10}.

SLOCAPCD provides threshold rates to determine the potential significance of emissions associated with individual development projects (Table 3). These thresholds pertain to emissions from both internal combustion engines and fugitive dust generated during construction. For ROG and NO_x, the criterion is 185 lb/day, while that for PM_{10} is 2.5 tpq. There are no thresholds for SO_X and CO.

Construction maximum daily emissions are below the regulatory thresholds, and hence, are less than significant. PM_{10} emissions from exhaust and fugitive dust associated with construction activities would also comply with the 2.5 tpq threshold, as shown in Table 3.

Even though PM_{10} emissions would be below the applicable SLOCAPCD significance threshold, certain basic fugitive dust control measures would be implemented during construction. Level 3 would implement a comprehensive series of dust control measures to manage fugitive dust during construction, reducing the associated PM_{10} emissions further below the level of significance.

Site Specific Environmental Commitments: Level 3 would implement a construction-phase dust abatement program, including the following activities:

- Water all active construction areas at least twice daily;
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard;

- Apply water three times daily, or apply soil stabilizers (non-toxic) on all unpaved access roads, parking areas, and staging areas at construction sites;

- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites; and
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Implementation of the above measures would assure compliance with fugitive dust PM_{10} standards. In summary, the project construction activities would comply with air quality standards, and would not contribute substantially to an existing or projected air quality violation.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal and state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

The Cuesta Grade Workaround is one of two PEA sites located in San Luis Obispo County. The other site is the San Luis Obispo 3R D-Node facility. The combined emissions of these two sites are shown in Table 4.

Although San Luis Obispo County is a nonattainment area for ozone and PM_{10} standards, the project's incremental contribution from both PEA sites to regional emissions is too small to be cumulatively considerable.

PM_{10} construction-related emissions would occur over a very short duration at any one location because project construction would proceed at a rate of approximately 2.5 miles per day, depending upon the particular construction method to be used along a given segment. This short duration will limit the extent to which the project may contribute to a local cumulative effect associated with other unrelated construction projects occurring in the area. Therefore, the project's contribution to any regional or local cumulative effect will be less than significant.

Site-Specific Environmental Commitment: Because combined emissions from the San Luis Obispo 3R D-Node and Cuesta Grade Workaround will exceed the threshold of significance for daily NO_x emissions (Table 4), Level 3 will reduce workaround spider plowing activities to nine hours per day if plowing occurs simultaneously with construction of the San Luis Obispo 3R D-Node.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
d) Would the project expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒

Along much of its length, the workaround passes through rural areas (Figure 5). The closest sensitive receptors include a number of residences located approximately 50 feet away from the northeast end of the workaround area (Figure 7).

Air quality impacts would occur over a short duration at any one location because project construction would proceed at a rate of approximately 2.5 miles per day, depending upon the particular construction method to be used along a given segment. This would greatly limit the time any receptor would be potentially exposed

to pollutants associated with workaround construction activities. It is highly unlikely that exhaust emissions or fugitive dust associated with these activities will impact receptors in the county park or otherwise in the vicinity of the workaround.

During construction, site access would be easy and direct for all work conducted along public roads. Construction vehicles will not block traffic on Highway 101 or other streets in the area for a significant period of time. Thus, emissions from idling vehicles in the vicinity of any sensitive receptors would be infrequent and minimal.

e)	Would the project create objectionable odors affecting a substantial number of people?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The only potential odor source associated with construction of the workaround would be the exhaust of diesel-fueled heavy-duty equipment. The odor of the exhaust from the construction engines would not affect a substantial number of people because only one piece of heavy-duty equipment would be used at a time and the workaround alignment is predominantly confined to rural, sparsely inhabited areas.

IV. BIOLOGICAL RESOURCES

Setting

The majority of the proposed workaround corridor consists of active vehicular roadways. The remainder of the corridor accesses land that has been disturbed due to cattle grazing, resulting in a predominance of non-native grassland. Remnants of scrub vegetation are evident in small patchy areas. Several jurisdictional drainages, ranging from ephemeral to perennial, are crossed by the project alignment. Wetland and riparian habitats are associated with these drainages.

Evaluation

a)	Would the project 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 U.S. Fish and Wildlife Service?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

An inclusive database search was performed for sensitive plant and wildlife species with the potential to occur in the vicinity of the workaround alignment (California Natural Diversity Database, San Luis Obispo and Lopez Mountain Quadrangles, California Department of Fish and Game, March 1999). The occurrence potentials for all sensitive species revealed in this search are included in Table 5. The California red-legged frog (*Rana aurora draytonii*, federal threatented and a California Species of Special Concern), and the Chorro Creek bog thistle (*Cirsium fontinale* var. *obispoense*, federal and state endangered), have the potential to occur in several previously identified streambeds along the project alignment. Sensitive raptor species may also find suitable nesting and perching habitat in the coast live oak woodland found throughout the alignment.

The southern portion of the workaround transects a recently grazed grassland community. Approximately half of the sensitive species listed in Table 5 are associated with this community type. The remaining spe-

cies listed in Table 5 are associated with chaparral, oak woodland, and riparian communities (habitats contained with in the northern section of the workaround).

Level (3) understands that there may be some degree of adverse affect to these species. However, the resulting impact shall remain below a significant level given the small size of the affected area and the site-specific commitments described below. Low impact construction methods such as directional bore and spider-plow are planned for this area.

Site-Specific Environmental Commitments: The creeks and dry beds located in the northern portion of the project alignment will be crossed by the existing dirt road (Old Stagecoach Road). The route follows this road where the cable innerduct will be buried into the road substrate. All culverts that appear to be obstacles for such trenching will be bored. All construction activities will be constrained to the existing dirt road.

The southern portion of the alignment is not accessed by an existing road. Three drainages located in this section do provide suitable habitat for sensitive species (red-legged frog, western pond turtle, and southern steelhead) and will consequently be bored. Boring equipment will be moved to opposite side of the drainage by the use of established access roads. These drainages will not be physically crossed. Based on life history patterns of the California red-legged frog, the setback distance or "buffer zone" between the edge of riparian vegetation and construction activity will be at least 100 meters where applicable (Figure 8). Additionally, seasonal avoidance by prohibiting construction during periods of precipitation will minimize potential impacts to this species. Biological monitors will be present at all environmental sites that have been identified as suitable habitat for sensitive species. Due to overlapping habitat associations, the implementation of the above commitments will also provide for avoidance of the Chorro Creek bog thistle habitat.

Surveys to identify active raptor and riparian dependent bird nests will be conducted by a qualified biologist no more than two weeks before the start of construction during the nesting season. Construction will be delayed within 500 feet of any occupied nest until the birds have vacated the area. Efforts will be made to avoid removal of all trees during project construction and none is anticipated. In the unlikely event that tree removal is unavoidable, trees with unoccupied raptor nests may only be removed prior to March 1, or following the nesting season (March 1 through July 30).

b)	Would the project 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 Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The high degree of disturbance associated with the project alignment has limited the plant community to predominately invasive, ruderal species. However, drainages with associated wetland and riparian areas are within the project alignment. The drainages and associated sensitive habitat will be avoided by directional boring. Where applicable, the bore will be defined by a 100-meter buffer extending out from the edge of riparian vegetation (Figure 8). Continuing consultation with the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and California Department of Fish and Game is planned to establish appropriate vehicle streambed crossing methodology and resolve additional environmental commitments.

c)	Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Drainages with associated wetland areas are within the project alignment. The drainages and associated sensitive habitat will be avoided by directional boring. Where applicable, the bore will be defined by a 100-meter buffer extending out from the edge of wetland vegetation. Sufficient erosion control devices will be installed adjacent to all wetland habitats to ensure that no discharge or fill will impact such areas. An on-site environmental monitor will be present to inspect the proper implementation of such erosion control devices. Continuing consultation with the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and California Department of Fish and Game is planned to establish appropriate vehicle streambed crossing methodology and resolve additional environmental commitments.

d)	Would the proposal 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The site is likely to function as a terrestrial wildlife corridor because of its unobstructed connection to native habitat. The site may also provide nursery habitat for native upland wildlife species. Pre-construction surveys will ensure avoidance of upland wildlife species and nesting bird species. Surveys to identify active raptor and riparian dependent bird nests will be conducted by a qualified biologist no more than two weeks before the start of construction during the nesting season. Construction will be delayed within 500 feet of any occupied nest until the birds have vacated the area. All impacts to the natural migration or movement of terrestrial wildlife species will be temporary. The project will not interfere with the movement of any migratory fish species.

e)	Would the proposal conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project will not conflict with any local policies or ordinances protecting biological resources. Efforts will be made to avoid removal of all trees during project construction and none is anticipated. In the unlikely event that tree removal is unavoidable, all appropriate permits will be attained by the County of San Luis Obispo.

f)	Would the project 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project will not conflict with any local policies or ordinances protecting biological resources.

V. CULTURAL RESOURCES

Setting

The site crosses the Miossi property northeast of San Luis Obispo. The workaround alignment crosses a ridge in a saddle between two hills and then follows Old Stagecoach Road to U.S. 101 at Cuesta Pass. The route follows U.S. 101 and then Cuesta Springs Road to the Union Pacific Railroad. Most of the area is undeveloped.

The project area is located in the region occupied by the Chumash when the first Spanish land expedition passed through the area in A.D. 1769. Most ethnohistoric and archaeological research in Chumash territory has taken place along the Santa Barbara Channel coast and the following prehistoric setting is based on a summary of this research.

King (1981) has divided the prehistory of the Santa Barbara Channel region into three periods: Early (8000 to 3350 B.P.), Middle (3350 to 800 B.P.), and Late (800 to 150 B.P.). King's chronology is based on stylistic changes in beads and ornaments from burial assemblages. The artifact types which indicate temporal affiliation are seldom found in quantity outside of cemeteries, limiting the usefulness of the chronology for dating components at other kinds of sites. However, the chronology can be tied to absolute dates through radiocarbon dating. Dates for the beginning and end of each of King's periods are based on radiocarbon dates from burial assemblages (King, 1981).

The Early Period has been divided into three phases, X, Y, and Z, with a gap in time between Phases X and Y. The X Phase of the Early Period, which precedes the peak of the warm dry climatic period known as the Altithermal, is characterized by the use of large flake and core tools and millingstones and handstones. The millingstones indicate the grinding of hard seeds, probably gathered from sage (*Salvia*) plants. Mortars and pestles, which indicate acorn grinding, were not widely used until the beginning of Phase Y after the peak of the Altithermal (Glassow, Wilcoxon, and Erlandson, 1988:8). Evidence for sea mammal procurement also begins at this time. It is possible that this increase in diet breadth may be related to a population increase associated with the end of peak Altithermal conditions (Glassow, Wilcoxon, and Erlandson, 1988). Evidence useful for reconstructing settlement patterns during the Early Period is extremely limited. Based on these limited data, King (1981) suggests that Phase X sites along the Santa Barbara Channel were located on crests of hills away from the ocean but some Phase Y sites were located on knolls adjacent to sloughs. During Phase Z King notes that sites were again located on higher ground. All Early Period sites investigated appear to be base camps, but it is likely that temporary camps also existed.

During the Middle Period (3350 to 800 B.P.) increasing sedentism and increasing emphasis on marine subsistence along the Santa Barbara Channel is reflected by the appearance of coastal villages occupied during a large part of the year. Circular shell fishhooks supplement the bone gorges and compound fishhooks which came into use during the Early Period (Tartaglia, 1976). The plank canoe, which made ocean fishing and travel to the Channel Islands safer and more efficient, came into use about 1500 B.P. (Arnold 1987:7). Use of the plank canoe also promoted trade and exchange between the mainland and the Channel Islands. Terrestrial hunting is indicated by use of contracting stemmed and corner-notched dart points (used with spear throwers). Increasing status differentiation is reflected by differences in amounts of beads and other ornaments associated with burials (Martz,1987).

The full development of Chumash culture, one of the most socially and economically complex hunting and gathering groups in North America (Arnold 1987:4), occurred during the Late Period (800 to 150 B.P. or approximately A.D. 1150 to 1800). Along the Santa Barbara Channel and on the Channel Islands there were a series of permanent or semi-permanent villages with populations of 200 to 600 or more individuals (Grant, 1978b). The principal economic pursuits were marine fishing and trading. Status differentiation had devel-

oped to the point where village chiefs inherited their rank and probably controlled trade and redistribution. Only certain higher ranking lineages built and operated plank canoes. Trade and redistribution of products from different environmental zones was facilitated by the use of shell bead "money," made almost exclusively on the Channel Islands. Making microdrills (used to make beads) from island chert sources was a specialized industry (Arnold, 1987:247). Chumash Channel-area villages contained circular houses made of willow poles and thatch. A hearth was located in the center of each house. In addition to houses, each village contained a sweat house, a sacred council chamber, a dance floor, and a cemetery (Rogers, 1929).

Terrestrial animals were hunted using the bow and arrow, indicated by the presence of projectile points weighing less than 3.5 grams (Fenenga, 1953). Acorns continued to be harvested and were processed using stone mortars and pestles. Acorns were a storable resource, which when combined with marine fishing, probably allowed a greater degree of sedentism to develop. Ornaments and beads were probably made by specialists and were used to reinforce status differences. They also played an important role in facilitating redistribution and exchange.

When the Spanish arrived in A.D. 1769 the Chumash occupied the coast from Malibu Canyon to San Luis Obispo and inland as far as the western edge of the San Joaquin Valley (Grant, 1978a). The Chumash were divided into several language or dialect groups that corresponded with territory around the missions founded by the Spanish. From south to north along the coast, there were the Ventureño around San Buenaventura Mission (now in Ventura), the Barbareño around Santa Barbara Mission, the Purismeño around La Purisima mpoc), and the Obispeño around San Luis Obispo Mission. These missions were founded between 1772 and 1788. The Cuyama, Emigdiano, and Castac were inland Chumash who lived where no missions were founded. The northern Channel Islands were also inhabited by Chumash.

The missionaries began a program of converting the Chumash to Christianity, baptizing them, and moving them into the missions. Here they were taught farming and European crafts. By 1804, most villages were abandoned and most Chumash lived at the missions. Unfortunately, the congregation of the population at the missions exposed them to European diseases to which the Native Americans had no resistance (Grant, 1978a). At La Purisima Mission, the Native American population declined from 1,520 in 1804 to approximately 400 in 1832 (Greenwood, 1978:521).

Mission San Luis Obispo de Tolosa was founded in what is now the town of San Luis Obispo in 1772. California became part of Mexico when Mexico gained its independence from Spain in 1822. Mission life ended when the missions and their lands were secularized by the Mexican government in 1834. Former mission lands were granted to soldiers and other Mexican citizens for use as cattle ranches. Ranching continued during the American period that began when the Treaty of Guadalupe Hidalgo was signed between Mexico and the United States in 1848. The Gold Rush of 1849 created a market for beef shipped from the southern California cattle ranches to northern California. Ranches in the area were purchased by Anglo Americans in the 1870s and converted to sheep ranches. The Southern Pacific Railroad was completed along the coast by 1901, resulting in increased settlement and agricultural production around San Luis Obispo.

Evaluation

a)	Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The protocols contained in Level 3's *Long Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999), requiring records searches and field survey, where appropriate, will be followed as summarized below. A technical report, providing more information on the results of the records search and field survey has been prepared (Mason, 1999).

Prior to the commencement of fieldwork, Level 3 archaeologists requested a records search for the proposed Cuesta Grade Workaround, and the lands within a one-half mile radius, from the California Historical Resources Information System, Central Coastal Center located at the University of California, Santa Barbara. The search had two objectives: (1) to determine whether previous archaeological investigations have been conducted in the project area, and (2) to provide information on known historic sites or culturally sensitive areas on and in the vicinity of the proposed Workaround. The records search was conducted by Information Center staff who also checked the OHP Historic Property Data File for San Luis Obispo County, which includes the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, and California Historical Landmarks.

In addition, the Level 3 Team sent a letter dated October 22, 1999 to the Native American Heritage Commission (NAHC) requesting a search of the NAHC Sacred Lands file and identification of a contact person or persons within NAHC for follow-on contact/consultation (White, 1999). The response, dated November 9, 1999, indicated that the NAHC search revealed no site-specific information on Sacred Lands (McNulty, 1999). The letter cautioned that absence of information did not necessarily indicate the absence of cultural resources. A list of Native American contacts that might serve as sources of additional information was also provided. Level 3 has followed up on this response from NAHC by sending letters to NAHC-identified Native American contacts residing in San Luis Obispo County, notifying them of the Level 3 project activities and requesting information they might have on sacred lands. Any response indicating the possible presence of Sacred Lands will be followed up with a detailed, site-specific evaluation utilizing the expertise of the relevant Native American contacts. The results of this effort are fully documented, as appropriate, in the supporting technical report (Mason, 1999).

These records searches (the Central Coastal Center provided no file number for the CHRIS search) indicate that no previous field surveys were conducted in the area of the proposed Cuesta Grade Workaround, and that there are no historic resources known to be present on or within one half-mile of the property (California Historical Resources Information System, Central Coastal Center, 1999).

b)	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The records searches identified in V(a) above indicate that the alignment had not been previously surveyed for archaeological resources, but that there are four previously recorded archaeological sites (3 historic, 1 prehistoric) within a half mile of the alignment. A field survey carried out by a qualified archaeologist (Carbone, 1999) showed that there are no archaeological resources that are potentially eligible for the California Register of Historic Resources present on the property.

c)	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

As mapped by Jennings (1964), the project site is underlain by Jurassic and Cretaceous metamorphic rocks of the Franciscan Formation (units KJf, KJfv); early Cretaceous marine sedimentary strata (unit Kl) presumably assignable to the Toro Formation of Hart (1976); the Miocene Monterey Formation (unit Mm); and Quaternary alluvium (unit Qal). The Franciscan Formation has yielded fossil remains presumably of a marine vertebrate at University of California Museum of Paleontology (UCMP) fossil site V-4958 elsewhere in San Luis Obispo County. The Toro Formation has yielded the fossilized shells of late Jurassic and early Cretaceous marine mollusks, including belemnites and clams, at a number of previously recorded (including U.S. Geological Survey) fossil sites in the project site vicinity, including one site on the Lopez Mountain

Quadrangle, 5 to 6 miles northeast of the project site (Gilbert and Dickinson, 1970; Hart, 1976; Page, 1972). The Monterey Formation has yielded marine clam and possibly snail shells at several previously recorded fossil sites near the project site, as well as vertebrate fossil remains at a number of UCMP fossil sites elsewhere in San Luis Obispo County. These fossil occurrences suggest that there is a potential for Mesozoic and Cenozoic marine invertebrate and vertebrate fossil remains being encountered by construction-related earth moving at the project site.

Site-Specific Environmental Commitments: Level 3's environmental commitment to performing paleontological monitoring during construction will allow for identification and recovery of any fossils that might be unearthed during cable installation. As part of the monitoring plan, a preconstruction field survey of the project site will be conducted by a qualified paleontologist, construction-related earth moving will be monitored by the paleontologist or a qualified paleontologic construction monitor to allow for the recovery of larger fossil remains at newly discovered fossil sites, and a small rock sample will be submitted for microfossil analysis. All recovered fossil remains will be fully treated (prepared, identified by knowledgeable paleontologists, curated, catalogued) and, along with associated specimen data and corresponding geologic and geographic site data, placed in a recognized museum repository. The paleontologist will prepare a final report of findings that includes an inventory of recovered fossil remains. These measures would be in compliance with Society of Vertebrate Paleontology (1995, 1996) guidelines for mitigating construction-related impacts on paleontologic resources and for the museum acceptance of a monitoring program fossil collection.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
d) Would the project disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

The records search and field survey provided no evidence of the presence of human remains (California Historical Resources Information System, Central Coastal Center, 1999; Carbone, 1999). If suspected human remains are encountered during construction, operations will stop until the proper officials have been notified, the find evaluated, any mitigation recommendations implemented, and Level 3 has been cleared to resume construction in the area of the find. The procedures to be followed are described in detail in Level 3's Long-Haul Fiber Optics Project Cultural Resources Procedures (Parsons Brinckerhoff Network Services, 1999:25-39), approved by the CPUC.

VI. GEOLOGY AND SOILS

Setting

The topography along the workaround varies from rolling hills to steep slopes. The site is not located within an Alquist-Priolo zone (San Luis Obispo County, 1974). According to San Luis Obispo County (1974), the workaround is in an area subject to moderate to high risk for landslides. The site is not within any other geological risk areas, including subsidence, liquefaction, or erosion. The site is not located on expansive soils (San Luis Obispo County, 1996).

Evaluation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earth-	☐	☐	☒	☐

quake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Mines and Geology Special Publication 42. Strong seismic-related groundshaking? Seismic-related ground failure, including liquefaction? Landslides?				

The workaround is not located in an Alquist-Priolo zone (San Luis Obispo County,1974). According to San Luis Obispo County (1976), the primary source of strong ground shaking in San Luis Obispo is expected to be the San Andreas Fault. The site is located approximately 3.5 miles from the Los Oso fault, 5 miles from the Rinconada fault, 17 miles from the Hosgin fault, and 33 miles from the San Andreas fault. These faults are capable of generating maximum credible earthquake magnitudes of 6.8, 7.3, 7.3, and 7.8 respectively (CDMG, 1996). The Nacimiento fault is located approximately two miles north of the site, but it is not classified as active or potentially active by the State of California (CDMG, 1997). A 10% probability of peak ground accelerations of 20 to 30% g in 50 years is expected in the project vicinity (CDMG, 1996). The site is not subject to ground failure or liquefaction (San Luis Obispo County, 1976). Although the site is subject to landsides, the project would not expose people or structures to potential substantial adverse effects related to these hazards.

b) Would the project result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	☐	☐	☐	☒

The construction techniques to be used would not result in substantial soil erosion or loss of topsoil.

c) Would the project 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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	☐	☐	☐	☒

There are some landslide prone soils in this area. However, in the case of the workaround, there are no permanent above-ground storage structures, nor any extensive grading operations which would lead to slope instability. Construction activities will result in a temporary shallow excavation to facilitate placement of the fiber optic cable. This shallow excavation will be backfilled immediately following installation of the innerduct. Given the absence of extensive grading operation (e.g., cut slopes), the shallowness of the five foot excavation, and the temporary nature of the construction activities, hillside stability will not be impacted and therefore is insignificant.

d) Would the project be located on expan sive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
	☐	☐	☐	☒

The project is not located on expansive soils. Trenching and installation of the buried fiber optic innerduct along the workaround will not create substantial risks to life or property.

e) Would the project have soils incapable of	Potentially	Less than Significant	Less than	

	adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Significant Impact ☐	with Mitigation Incorporation ☐	Significant Impact ☐	No Impact ☒

The workaround does not require sewer service.

VII. HAZARDS AND HAZARDOUS MATERIALS

Setting

No indications of potential hazardous materials or storage were found in database searches (Vista Information Solutions, *California Site Assessment*, 1999). The site is not within two miles of a public or private airport or within one-quarter mile of a school.

Evaluation

a)	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project will not transport, use, or dispose of any hazardous materials.

b)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project will not transport, use, or dispose of any hazardous materials.

c)	Would the project emit hazardous emis sions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

There are no schools located within a quarter-mile of the site.

d)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site is not located on a site included on a list of hazardous materials sites (Vista Information Solutions, *California Site Assessment,* 1999).

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 for people residing or working in the project area?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within an airport land use plan, nor within two miles of a public airport or public-use airport.

f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within the vicinity of a private airstrip.

g)	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Development of this site would not alter emergency response or emergency evacuation routes. Roadways would not be blocked either during construction or operation.

h)	Would the proposal 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The cable would be buried underground and not be exposed to wildland fires.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The workaround is not located in groundwater recharge area (San Luis Obispo County, 1996), nor is it located in a 100-year flood zone (Vista Information Solutions, *NEPA Checklist*, 1999). Drainage on the alignment consists of irregular sheet flow with no evidence of man-made facilities. The alignment shows no evidence of recent flooding; therefore, there appears to be no substantial potential for flooding.
the site is not within an area subject to a high potential for inundation by seiche, tsunami, or mudflow (San Luis Obispo County, 1999). San Luis Obispo Creek is located approximately 100 feet from the southern end of the site.

The Cuesta Grade Workaround crosses several jurisdictional waters of the U.S. (Figure 9). The proposed workaround will not directly affect these drainages or any associated wetlands. Jurisdictional wetlands will avoided by directional boring. The boring will be approximately 12-inches in diameter, and will be backfilled

with bentonite slurry. The bentonite slurry will seal the boring and will prevent the boring acting as a conduit for drainage of these drainage and wetland area. Appendix C of the PEA includes details on use of bentonite slurry in directional boring and its past performance in similar situations.

Evaluation

Site-Specific Environmental Commitments: As appropriate, Level 3 will implement the following measures at the Cuesta Grade Workaround to avoid and minimize effects on the aquatic environment and to re-establish vegetation after construction:

- Bore under sensitive habitats when practicable;
- Implement erosion control measures during construction;
- Remove cover vegetation as close to the time of construction as practicable;
- Confine construction equipment and associated activities to the construction corridor;
- No refueling of construction equipment will take place within 100 feet of an aquatic environment;
- Comply with all state, federal, and local permits;
- Perform proper sediment control;
- Prepare and implement a spill prevention and response plan;
- Remove all installation debris, construction spoils, and miscellaneous litter for proper offsite disposal; and
- Complete post-construction vegetation monitoring and supplemental revegetation where needed.

Appendix E of the PEA identifies the documents and practices in which these measures will be specified. The following paragraphs identify the likely permits/approvals required of local and state agencies.

A Streambed Alteration Notification has been submitted to the California Department of Fish and Game (CDFG). The project will take place in the vicinity of several streams and other natural and modified natural drainages and therefore requires notification to CDFG prior to construction pursuant to Section 1603 of the Fish and Game Code. Consultation with CDFG regarding the Streambed Alteration Notification is on-going.

An Encroachment Permit(s) from Caltrans will be required for installation of the project within the Caltrans right-of-way (ROW). For standard access roadways, the encroachment permit process involves the submittal of an application and construction drawings to Caltrans for approval of a longitudinal encroachment. Standard access roadways are those where access is not limited. For controlled access roadways, such as freeways or expressways, a Justification for Exception to Policy must be approved by Caltrans. This justification must include information regarding the utility installation and show that the installation will not adversely affect highway safety and traffic operations.

An Encroachment Permit Application and drawings have been submitted to Caltrans District 5 for the portion of the Cuesta Grade Work-Around that is on standard access streets. After a 30-day review period at the local district office, the application will be submitted to the State office of Caltrans for final approval. A Justification for Exception to Policy has been submitted to Caltrans District 5 for the portions of the Cuesta Grade Work-Around that occur along Highway 101. The Justification document is currently under review for completeness by the District 5 office.

A letter has been sent to the Central Coast Regional Water Quality Control Board (Region 3) requesting 401 Water Quality Certification Waiver. A waiver of 401 Certification is justified because the project will cause only temporary construction-related disturbance to waters of the U.S., and the erosion and pollution control measures and low-impact construction methods would not result in impacts to water quality.

A Notification of Intent (NOI) has been sent to the Central Coast Regional Water Quality Control Board to incorporate the Cuesta Grade Workaround under the General Storm Water Permit to Discharge Storm Water Associated with Construction Activity (General Permit) for the Long-Haul portion of the Level (3) project. A Storm Water Pollution Prevention Plan (SWPPP) has been prepared for the construction activity. This

SWPPP includes the following sections: 1) Project Description; 2) Best Management Practices (BMPs) for Storm Water Pollution Prevention; 3) Inspection, Maintenance, and Record Keeping; and 4) Training.

a)	Would the project violate any water quality standards or waste discharge requirements?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would not discharge substances that could contaminate water. Hazardous materials (diesel fuel) would be used in the construction equipment. Wastes generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations.

b)	Would the project 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not deplete groundwater supplies or interfere with groundwater recharge.

c)	Would the project 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 off-site?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

After installation of the cable, the site will be returned to its original contour. Substantial erosion or siltation on or off the site would not be expected because of the erosion control measures which would be employed as part of Level 3's Site Specific Environmental Commitments. The measures to be implemented are consistent with current practices used on the Long Haul project that are summarized in Appendix E.

d)	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not alter the existing drainage pattern of the site or area because the surface will be returned to its original condition and contour.

e)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

additional sources of polluted runoff?				

The project would not create or contribute runoff water because the surface will be returned to its original condition.

f)	Would the project otherwise substantially degrade water quality?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Sgnifi-gant Impact ☒	No Impact ☐

No impacts to water quality are expected as a result of this project. The project would not result in polluted runoff, nor generate wastewater, nor discharge substances that could contaminate water because of the erosion control measures which would be employed as part of Level 3's Site Specific Environmental Commitments. The measures to be implemented are consistent with current practices used on the Long Haul project that are summarized in Appendix E.

g)	Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not include housing.

h)	Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within a 100-year floodplain.

i)	Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The City of San Luis Obispo and the area north of the City where the workaround (site) will be installed are not listed as areas subject to dam failure (San Luis Obispo County General Plan, Safety Element, 1976, pages 2.52 and 2.53). In addition, the site consists of buried cable and not a structure. The site will be occupied by construction workers for only a short period of time while the cable is installed. Therefore, there is no significant risk of loss to "structures" or human injury or loss of life from dam failure.

j)	Would the project expose people or structures to a significant risk of loss, injury or death due to inundation by seiche, tsunami, or mudflow?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Tsunamis and seiches are not considered a hazard to the City of San Luis Obispo (San Luis Obispo County General Plan, Safety Element, 1976, page 2.57). Mudflows are not discussed in the San Luis Obispo

County General Plan. As presented in the Geology section, there are no permanent above-ground storage structures, nor any extensive grading operations and construction activities will result in a temporary shallow excavation to facilitate placement of the fiber optic cable. This shallow excavation will be backfilled immediately following excavation. The site will be occupied by construction workers for only a short period of time while the cable is installed. Therefore, there is no significant risk of loss to "structures" or human injury or loss of life from mudflows.

IX. LAND USE PLANNING

Setting

Table 2 provides specific policies relative to land use (and other environmental impact areas) at the Cuesta Grade Workaround site. This table also indicates the need for local land use permits/approvals. A site parcel map showing the Workaround and surrounding parcels is provided as Figure 3, and Figure 5 shows land use in the immediate vicinity of the workaround.

A portion of the site is designated "Agricultural" under the San Luis Obispo General Plan, which applies to prime agricultural soils and other productive and potentially productive lands located inside and outside of urban and village reserve lines.

A portion of the northern end of the site is designated "Rural Use," which seeks to provide for residential and other development at a low density compatible with a rural character and life style which maintains the character of the open countryside and is compatible with surrounding agricultural uses.

Site-Specific Environmental Commitments: Level 3 will obtain all required local land use permits for the Cuesta Grade Workaround site. The Cuesta Grade Workaround is consistent with local policies and is a permitted use within the site-specific land use and zoning designation. Permitted uses fall into categories by local land use regulations, resulting in some permitted uses being allowed by right, with only administrative approval, and other permitted uses being allowed through a discretionary process. The Cuesta Grade Workaround will require only administrative land use review and approval from the local jurisdiction prior to issuance of a minor use permit for project construction. Administrative land use processing involves staff-level or Planning Director-level review of a project for consistency with local policies.

The proposed project would not "… conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect." Therefore, by definition, there will be no impact to local land use designations associated with this site.

The requirement for an administrative use permit does not imply a lack of conformance with local land use designations. Rather, a use permit is implemented to assure the local jurisdiction that the proposed use, already determined to be consistent with local land use designations, also is in compliance with the many and varied other concerns the local community may have. Such concerns may include, but are not limited to, hours of operation, building height, setbacks, landscaping, exterior materials and colors, parking, and architectural character. Conditions imposed through the use permit process will be fully complied with by Level 3. At this time, however, it is not possible to identify the conditions of the use permit that will be applied to the Cuesta Grade Workaround.

Evaluation

a)	Would the project physically divide an established community?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The scattered rural residences located in the vicinity of the project are not considered an established community. The project would not physically divide an established community. There are no above-ground structures.

b)	Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The San Luis Obispo County General Plan land use designations for the site are "Agriculture" and "Rural Use." The San Luis Obispo Land Use Ordinance allows the construction of utilities with a Minor Use Permit in any zone in the county. Thus, the project is compatible with the applicable land use plans, policies, and regulations.

c)	Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

X. MINERAL RESOURCES

Setting

The project site is not located in an area designated by the state or San Luis Obispo County for mineral resources (Caruso, 1999).

Evaluation

a)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located in an area with known mineral resources so development of the site would not result in impacts to mineral resources of value to the region or the residents of the state.

b)	Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan other land use plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located in an area with known mineral resources so development of the site would not result in loss of locally important mineral resources.

XI. NOISE

The analysis included herein revealed that there should be no significant noise impacts for either workaround construction or operations. This is partially attributed to the absence of numerical noise thresholds for the County of San Luis Obispo (County). However, elimination of noise impacts to a level of insignificance is also being achieved by Level 3 through environmental commitments to restrict construction work hours in accordance with County guidelines.

In the case of this workaround, construction work could be completed in approximately 6 days. However, shown in the air quality checklist analysis, construction activities will proceed somewhat slower in order to comply with air quality construction thresholds.

This short-term construction project will create temporary low level noise impacts that are less than significant. In addition, since there are no permanent above ground facilities or operations associated with the workaround, there will be no long-term noise impacts from site operations. The only activity after construction would be an occasional inspection visit by one vehicle, which would have a negligible noise impact.

Setting

The Cuesta Grade Workaround is located along Cuesta Grade, which is approximately six miles north of the City of San Luis Obispo in San Luis Obispo County. Along much of its length, the workaround passes through rural areas (Figure 5). However, at the start (i.e., southwest end) of the workaround there is a county park located in close proximity (approximately 20 feet). The closest residences are located approximately 50 feet from the workaround near the northeast end (Figure 7). The San Luis Obispo County general plan land use designations for the site are "Agriculture" and "Rural Residential". The Land Use Ordinance (San Luis Obispo, County of, 1996) allows construction of utilities with a Minor Use Permit in any zone in the county. The site is not located within two miles of a public or private airport, nor is it within an airport land use plan. The estimate of ambient noise levels (35 dBA) was derived from Schomer and Associates (1991) as typical of sites designated as "very quiet, sparse suburban and rural areas."

Noise will be generated from construction of the workaround. Noise from off-site construction activities, associated with personnel vehicles and material delivery trucks, was not included because all vehicles will travel legally on local streets and state highways and will not remain stationary for a significant period of time to create a noise disturbance. As stated in section III (Air Quality) site access is generally easy and direct, and traffic will not be blocked on local streets or highways for any significant period of time. These construction activities will include installation of underground fiber optic cable in a trench approximately one foot wide and four feet deep. The construction zone will be approximately 10 feet wide. The construction process will proceed in the following sequence of activities: surveying and potholing, boring and clearing, excavating, cable installation and splicing, handholing, marking, and site restoration.

Construction methods used to excavate the trench will include plowing, trenching, and/or boring. Construction activities will require different types of construction equipment, including tracked bulldozers, rubber-tired traction units, haul trucks, rubber-tire backhoe/loaders, and road graders(Table 3). The number and type of equipment in use on a given day will depend upon the particular type of construction method used along a given segment.

Project construction will proceed at a rate of approximately 2.5 miles per day, depending upon the particular construction method that will be used along a given segment. This will greatly limit the time any receptor will potentially be exposed to noise associated with workaround construction activities.

Maximum potential noise at maximum engine power for diesel-powered construction equipment (muffled) measured at a distance of 50 feet away is 84 dBA (U.S EPA, 1971). This 84 dBA value was used as the maximum noise level from workaround construction activities. The maximum construction noise level of 92 dBA at the closest receptor (public receptor at Cuesta County Park) was estimated by adjusting the 84 dBA value using the inverse square of the distance between the site and the receptor. (Note that this is higher than the value at a 50-foot distance because the nearest receptor is conservatively estimated to be 20 feet

away). Detailed methodologies, algorithms, and assumptions associated with the noise analysis are provided as Attachment A.

The local noise regulation exempts construction activities from noise standards during the period 7 am to 9 pm on weekdays and 8 am to 5 pm on weekends (personal communication with Art Trinidad of the San Luis Obispo County Planning and Land Use Department, July 9, 1999). Construction activities would be restricted to these periods and days, hence, no numerical thresholds apply.

Following construction, no operations would occur at the workaround, as there are no aboveground facilities. Negligible noise would be generated by the occasional visit of a vehicle for inspection of the cable. Therefore, operational noise impacts would be less than significant.

Evaluation

a)	Would the project result in 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?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

The project will not generate noise levels in excess of local standards during construction or operation because no numerical standards apply. Therefore, no regulatory-based threshold will be exceeded. Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the time period between 7 am to 9 pm weekdays and 8 am to 5 pm on weekends. The estimated maximum noise level at the nearest receptor is 92 dBA. Since construction activities are linear and will proceed quickly, nearby public receptors, which are located at both ends of the workaround, will be exposed to this noise level for a very short time.

Except for negligible noise from the occasional visit of one vehicle to the workaround for inspection, there are no operational activities. Therefore, operation related noise impacts are less than significant.

Site Specific Environmental Commitment: Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the period between 7 am to 9 pm weekdays and 8 am to 5 pm on weekends.

b)	Would the proposal result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Neither project construction or project operations will generate excessive groundborne noise or vibration. The low level groundborne vibration and noise generated during construction will be short term in nature, and generally will not extend more than a few feet from the active work area. Since the nearest public receptor is at a 20 feet distant and the nearest sensitive receptor is at a 50 feet distant, there will be a less than significant impact from groundborne vibrations or noise during construction.

For the operational period, there will be no aboveground machinery (e.g., generator) for this workaround that could potentially generate excessive groundborne noise or vibrations; in addition, the buried fiber optic cable will not generate any perceptible vibrations or noise. Consequently, there will be no excessive groundborne vibration or noise impacts from site operations.

c)	Would the proposal result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

As indicated above, there will be no significant operation-related noise, because all site improvements are confined to the buried fiber optic line and there are no permanent above-grade facilities or operations. Consequently, permanent ambient noise levels in the vicinity of the site will not increase above existing levels and there is no resultant impact.

d)	Would the proposal result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

Construction noise will be temporary. Temporary noise increases will occur during construction, but will be in compliance with the local construction noise ordinance, and, therefore will not be significant. The periodic noise generated by an occasional visit of one vehicle to inspect the site will be negligible.

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 expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within an airport land use plan or within two miles of a public airport or a public use airport.

f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The site is not located within the vicinity of a private airstrip.

XII. POPULATION AND HOUSING

Setting

The workaround is located within San Luis Obispo County, with an estimated population of 234,100 as of January, 1999 (Thomas Bros. Maps, 1999). The nearest housing is a single-family dwelling approximately 50 feet northeast of the intersection of Old Stage Coach Road, a private road, and SR-101.

Evaluation

a)	Would the project induce substantial 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)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The proposed project would not create new housing nor extend roads or other infrastructure that would indirectly induce population growth.

b)	Would the project displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not displace existing housing units.

c)	Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not displace people.

XIII. PUBLIC SERVICES

Setting

The site is located within San Luis Obispo County. Fire protection is provided by the California Department of Forestry. Police protection is provided by the San Luis Obispo County Sheriff's Department and the San Luis Obispo City Police through a mutual aid agreement. The nearest public park is Cuesta County Park, located adjacent to the southern end of the project. Approximately one-half mile west of the project site is a public elementary school and approximately one-half mile south of the project is San Luis Obispo High School. Also, California State Polytechnic University at San Luis Obispo is located approximately three-quarters of a mile northwest of the southern end of the project.

Evaluation

a)	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 or the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not result in a need for new or physically altered government facilities nor affect response time or other performance objectives.

XIV. RECREATION

Setting

Cuesta County Park is adjacent to the southern end of the site. The park contains a picnic area and playground equipment, an animal hospital and animal exhibit area, and an administrative building. The parking lot separates the site from the park facilities by approximately 200 feet.

Evaluation

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?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

This project would not be occupied, and would therefore not increase the use of existing parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated.

b)	Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not include recreational facilities nor require the construction or expansion of recreation facilities which might have an adverse effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Setting

The workaround will be located within public and private roads and on private property. The Miossi Road and Old Stage Coach Roads are public roads under County jurisdiction. Miossi Road is a two-lane paved road with no on-street parking and an unpaved shoulder. Miossi Road is designated as a local road in the San Luis Obispo County General Plan Circulation Element (Margason 1999). Old Stage Coach Road is a County-maintained unpaved road and is unclassified in the San Luis Obispo County General Plan. Padre Road is an unpaved private road and is not classified in the San Luis Obispo County General Plan.

The workaround begins in the south at the point where Miossi Road becomes Loomis Street. Loomis Street is a public two-lane road, and is classified as a local road in the San Luis Obispo County General Plan Circulation Element (Margason 1999). Loomis Street ends at the entrance to the parking lot for Cuesta County Park and becomes Miossi Road from this point north.

SR-101 parallels the workaround for its entire length. SR-101 is a limited-access four-lane divided highway in the project area. The workaround would not encroach upon SR-101. Caltrans recently began a program to widen SR-101 in the project area. The Caltrans widening project will take approximately five years.

Evaluation

a)	Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

During construction at the site, construction workers will be commuting to the workaround site for approximately four to six weeks. The average number of commuting workers is expected to be four. The workers will commute during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and park on land traversed by the workaround cable or off adjacent, low-use roads. Trenching and boring equipment will usually be delivered once to the site and removed when the project is complete. Occasionally, trucks will deliver cable and other materials to the site and haul a minimal quantity of construction debris from the site to recycling centers or landfills. These truck trips will be infrequent and off-peak from area traffic flows. A construction staging/laydown area will not be required. The offsite impacts from construction are therefore expected to be less than significant. During operation of the site, a service person will occasionally visit the site for inspection and to perform routine maintenance and repairs. The project would therefore not result in a permanent increase in traffic load or daily trips because the project site would not be occupied on a daily basis.

b)	Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

There would be no permanent impact to levels of service associated with the project because the project site would not be occupied on a daily basis.

c)	Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not affect air traffic patterns.

d)	Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not increase hazards due to design features or incompatible uses.

e)	Would the project result in inadequate emergency access?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not affect emergency access routes.

f)	Would the project result in inadequate parking capacity?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not affect nor require parking.

g)	Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not conflict with adopted policies, plans, or programs supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

The workaround would consist of the underground fiber optic cable and would not require utilities or service systems. Portions of the workaround will be installed near or adjacent to other existing utility lines, including another fiber optic carrier and a petroleum pipeline.

A minimal amount of "green" waste will be generated at the Cuesta Grade Workaround during cable placement operations. The Workaround includes no aboveground structures, so there is no operation-phase waste associated with the workaround. If necessary, Level 3 will utilize the Cold Canyon Landfill for disposal of the small amount of solid waste generated during site clearing. Based on personal communication with the San Luis Obispo County Division of Environmental Health (805-781-5574) the permitted daily capacity of

this landfill is 750 tons with average daily intake of 399 tons. The capacity of the Cold Canyon Landfill is sufficient to accept the anticipated waste from the proposed project.

Evaluation

a)	Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not increase the burden on wastewater treatment. The site would not be occupied. During construction, portable chemical toilets will be used on-site.

b)	Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not increase the burden on wastewater treatment. The site would not be occupied.

c)	Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project would not increase the burden on stormwater drainage facilities.

d)	Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

This project would not require water hook-ups.

e)	Would the project 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?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

This project would not require wastewater treatment.

f)	Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

A small amount of clean-up would be required during construction of the site to remove accumulated trash. The amount of refuse removed from the site and disposed of in landfills would be less than significant.

g)	Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

A small amount of clean-up would be required during construction of the workaround to remove "green waste." The amount of such refuse that would be disposed of in landfills would be very small and easily accommodated within local landfills. During operation, the site would not generate solid waste.

Analysis Team

A multi-disciplinary team of environmental analysts prepared this Environmental Checklist. The team members visited the site, visited the local agency, and used various other sources to perform the analysis. The team members and the dates of their field work, if applicable, are listed below:

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Tables

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Figures

Photo Plates

Photo A View Along Site
Photo B View of Middle of Site
Photo C View of West of Site

Attachment

Attachment A. Methodologies, Algorithms, and Assumptions Used in the Air and Noise Analysis.