Appendix A – No. 2

PROPONENT'S ENVIRONMENTAL ASSESSMENT
ENVIRONMENTAL CHECKLIST

Site name: Palo Cedro ILA

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, Palo Cedro ILA

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

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

4. Facility Location:
The site is located at 22020 Palo Way in the unincorporated community of Palo Cedro, approximately 5 miles east of Redding in Shasta County, California (Assessor Parcel No. 59-11-67). The site is an approximate 0.53-acre parcel, nearly rectangular shaped with a jog in the western property line. The site is bordered by Palo Way on the south (a private dead-end road), a vacant parcel on the north, and commercial businesses on the east and west. Highway 44 runs east-west on the other side of the vacant parcel north of the site. Overhead utility lines run east-west on both sides of Palo Way. Beyond the adjacent parcels on the south, east, and west are additional commercial business with scattered vacant parcels in the area.

Currently there are two metal buildings onsite with water hook-ups and electricity. Overhead utilities run east-west along both sides of Palo Way.

(See Figure 1, Regional Map; Figure 2, Vicinity Map; Figure 3, Parcel Map; Figure 4, U.S.G.S. Quad Map; Figure 5, Surrounding Land Use Map; and Figure 6, Photo Key Map.)

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: Commercial

7. Zoning: Community Commercial (C-2) District

8. Description of Facility:
This checklist evaluates the design, construction, and operation of the Palo Cedro ILA. This facility, which will support the Long-Haul network, will be located outside a utility corridor.

An ILA station is required to receive signals and amplify the light power that comes into it before transmitting the signal along the fiber optic cable. Signal amplification capabilities are required approximately every 60 miles or less along the network.

The Palo Cedro ILA will be constructed on a developed 0.53-acre site at 22020 Palo Way in Palo Cedro, an unincorporated community of Shasta County. ILA facilities, including up to four prefabricated huts, a separate generator shelter, and associated parking and access roads, will require development of a 5,000 square foot portion of the parcel.

Two existing prefabricated aluminum buildings will be relocated to another site. The concrete slab forming the floor of the larger building will be used for ILA hut placement. Prefabricated ILA huts will be delivered and placed on an engineered portion of the existing concrete pad. A separate generator structure will be constructed utilizing another engineered portion of the building pad.

The proposed ILA will include up to four prefabricated, transportable, modular amplification units (huts), each measuring 12 feet by 36 feet (432 square feet) and 10 feet 3 inches in height. The set of four huts will be installed on a 24-foot-by-72-foot (1,728 square feet or 0.04 acre) section of the concrete pad and will be attached side-by-side. The emergency standby generator will be housed in a separate, 288-square foot pre-assembled shelter.

The huts and generator shelter will arrive pre-assembled. No additional buildings will be constructed. Control and maintenance functions will occur within the proposed facilities. An outside light equivalent to a small porch light will illuminate the entrance to each structure. The parcel is paved with a gravel area on the north side, directly adjacent to Palo Way, which is also paved. Current access and parking is sufficient to support planned maintenance functions.

No grading will be required for site development. No change in site drainage characteristics is anticipated from development of the ILA facility. In the unlikely event that stormwater drainage modification will be required, they will be installed per Shasta County Ordinance 1608, which adopts the California 1997 UBC (Wood, 1999) and with NPDES CAF00002 Order No. 92-08-DNQ (Crowe, 1999).

The current owners of the property will relocate the existing buildings to another site. Neither of these buildings will be demolished, either onsite or offsite. The estimated quantity of solid waste generated during construction is 70 cubic yards. During operation of the ILA facility, there will be minimal or no generation of solid waste since the site will not be permanently staffed and site visits will be infrequent (one per week) and of short duration (one to several hours).

The Palo Cedro ILA will require electricity and telephone. Utility poles supporting these services are located along Palo Way, and a utility drop is in place to support the existing buildings on site. The ILA facility will operate using 400-amp, 480-volt, three-phase electrical service. No water or sewer hookups are anticipated because the site is unmanned. Fire protection equipment will be installed per Shasta County Ordinance No. 16.08.010, which references Section 18938 of the California Health and Safety Code, thereby adopting the UFC (Venderhide, 1999).

Figure 7 is a conceptual plot plan of the Palo Cedro ILA site showing required setbacks and locations of utility and vehicle access. The area bounded by the setbacks is the "development window" within which the ILA facility will be situated. The precise location of the ILA facility is defined by the location of the concrete pad underlying the larger of the existing buildings (which will be relocated) upon which the ILA huts and generator shelter will be located.

Upgrading of the generator and ILA shelter foundations will be engineered and completed prior to delivery of prefabricated components (i.e., shelters), placement of the fiber optic cable, and installation of utility connections. Fencing will be of chain link construction and eight feet in height. A locked gate will restrict access to the south and east sides of the building.

The fiber optic cable feed to the ILA will enter the site via Palo Way, a utility ROW. Access and egress of the conduit will follow opposite sides of the street approximately 150 feet from the intersection with Deschutes Road. The connection to the ILA facility will be installed at a depth of approximately 42 inches either by plowing in the conduit (which does not require a trench) or by digging a trench, laying the conduit, and back-filling.

One 300-kilowatt (kW), 449-horsepower (hp) diesel-powered generator will provide emergency power to the set of four ILA huts. The pre-cast concrete generator housing or shelter will be approximately

12 feet wide, 24 feet long (288 square feet) and 10 feet high. It will be assembled at the site and installed on a concrete foundation. Insulation will be provided as needed for noise abatement. The pad will be equipped with vibration isolators to effectively reduce groundborne vibration caused by generator operation. The vibration isolator would also reduce structure-borne noise by interrupting noise transmission paths caused by "sounding-board" effect. The generator will be mounted on a 1,000-gallon, double-walled, aboveground storage tank that is thirteen feet long by 8 feet wide by 1 foot 9 inches high. The double-walled storage tank on which the engine/generator set is mounted is designed to support the weight of the engine/generator set and this mounting is a common design for emergency engine/generators. For engine/generator sets that are operated more frequently, the fuel tank is mounted separate from the engine/generator since greater fuel storage capability is required and the storage tank would be too large to be located beneath the engine/generator (Rice, 1999). Therefore, the fuel tank will be housed within the generator shelter. The tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote).

During operation at 100-percent load, the 449-hp generator consumes approximately 22 gallons of diesel fuel per hour (gph). At 75 percent load, fuel consumption rate is 16.5 gph. During most of the 25 minutes of testing and maintenance run time each week, the generators will run at 50-percent load. However, for the purposes of this "worst-case" calculation, Level 3 assumes a 75-percent load and 30 hours of run time each year (i.e., 1/2-hour/week times 52 weeks, plus four hours contingency). This results in an estimated fuel consumption of 495 gallons per year for testing and maintenance purposes. Therefore, 30 hours per year multiplied by 16.5 gph equals 495 gallons of diesel fuel consumption per year for testing and maintenance. Testing of the emergency generator will be controlled remotely, and will not be part of site maintenance activities.

Level 3 will equip each generator with a spill tray beneath the filling port and a spill emergency response kit. The kit will consist of a 55-gallon drum containing oil-absorbing booms and pads, tarps, duct tape, and shovels. These materials will be placed near the filling port for immediate access should a release occur. A laminated placard listing the number of an emergency response contractor and appropriate spill-reporting procedures will be contained in the drum and will also be displayed near the filling port. Should a release occur that Level 3 personnel could not manage, the emergency response contractor will be called.

The closest public receptor to the site is located approximately 30 feet to the west (a restaurant), with several other commercial establishments located within 110 feet of the site (Figure 8). The closest sensitive receptor are residences in a trailer park located approximately 1,500 feet to the west of the site.

In line with its commitment to environmental compliance, Level 3 will train technical staff regarding safety and spill-response procedures that should be implemented during diesel fuel deliveries. These written procedures will define the necessary steps for use and disposal of spill containment equipment located at the site. A Level 3 technician will accompany any third party contractor delivering fuel. Because the facilities are kept locked, the Level 3 technician will unlock/lock the security gate during ingress and egress. The technician will advise the contractor as to the location of the filling port for the fuel tank, describe the site safety requirements, observe the fueling process, and listen for the high fuel alarm. Should a release occur, the Level 3 technician will immediately initiate containment and cleanup procedures.

The ILA site will not be permanently staffed. The site will be visited approximately once a week for routine maintenance, data downloading, and (as necessary) generator fuel tank filling (assumed for the purpose of analysis purposes to be 60 trips per year).

Current and potential cumulative projects in the vicinity of the proposed Palo Cedro ILA site are provided in Table 1. Criteria for inclusion of a project in Table 1 are as follows:

- Projects are within two miles of the site. In some cases these projects are in more than one jurisdiction;
- Projects are scheduled for construction from one year before to one year after the "construction window" for the Level 3 facilities, or between March 1999 to March 2003;
- Current projects include those which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified; and
- Potential projects are those that 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.

9. Surrounding Land Uses and Environmental Setting:

The project site is located in a commercial business area. Area development appears to be clean and well-maintained. Adjacent to the project on the east is a commercial building containing two businesses, a flower shop and a smog check shop. Adjacent to the project on the west is a restaurant. A restaurant is also located on the parcel south of the project site across Palo Way. A vacant parcel is adjacent to the site on the north, and beyond the vacant parcel is an east-bound ramp onto Highway 44. A PG&E substation is located across Deschutes Road and the closest residences to the project site or located west and adjacent to the PG&E substation.

10. Other Agencies Whose Approval is Required:

The site is located within the jurisdiction of Shasta County.

The construction of a building for an ILA facility is considered a permitted use subject to obtaining an administrative permit (Lusso, 1999). After submitting the completed application and associated materials, the County will notify adjacent parcel owners of the proposal and allow a specific response time. The Shasta County Planning/Building Division will review the application. The process typically takes four to six weeks. After the administrative permit is issued, a building permit will need to be obtained through the Building Division.

The site is also located within the jurisdiction of the Shasta County Air Quality Management District (ShCAQMD).

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.

PROPONENT'S DETERMINATION

On the basis of this initial assessment, the proposed facility 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 facility is an element of the project addressed in an Application for Modification of an existing Certificate of Public Concern and Necessity (CPCN) (Decision No. 98-03-066). That CPCN was supported by a Mitigated Negative Declaration that included mitigation measures to be implemented in the design, 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 Proponent's Environmental Assessment (PEA). Therefore, the actions previously imposed as mitigation measures in the CPCN Decision are now Environmental Commitments for the facility addressed herein. In summary, these Environmental Commitments include:

- Measures to mitigate 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 PEA.

Mitigation Measures

No Mitigation Measures are recommended for the Palo Cedro ILA site. All potential impacts can be avoided or reduced to less-than-significant levels through implementation of Level 3's Environmental Commitments**.**

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ENVIRONMENTAL IMPACTS

I. AESTHETICS

Setting

The site is mostly paved with some gravel area. Two commercial buildings, used mainly for storage, occupy the site. Commercial businesses predominate in the immediate vicinity of the site with some scattered vacant lots. The parcels adjacent to the project site on the east, west, and south are commercial businesses, and the adjacent parcel to the north is a vacant lot. The site is visible from most of the surrounding parcels. The closest residence is approximately ¼mile west of the site. The trees and veget ation adjacent to the residential area, the PG&E substation (across Deschutes Road west of the site, See Figure 5), and the restaurant adjacent to the project site provide visual barriers so the project site cannot be seen from the housing area. There are no scenic highways near the project site. Highway 44, located ¼ - ½mile north of the site, is eligible for official scenic highway designation, but has not been so designated. There are no local aesthetic policies applicable to the project.

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 site has a commercial business character and is in an area of multiple businesses. The constructed ILA facility will be just over 10 feet tall. The existing larger building currently on site is greater than 10-feet tall. The project would not have a substantial adverse effect on a scenic vista.

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 site is not visible from a state scenic highway. There are no scenic resources located on the site.

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 has a commercial business character and is in an area of multiple businesses. The constructed ILA facility will be just over 10 feet tall. The existing, larger building on the site, which will be removed, is greater than 10-feet in height.

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 outside lights to be provided would be small porch lights at each structure entrance. These lights are not a new source of substantial light or glare adversely affecting day or nighttime views in the area.

II. AGRICULTURAL RESOURCES

Setting

The site is located in a commercial business area with scattered vacant parcels. The site is presently used for commercial business storage. The site is not located on Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance (California Department of Conservation, 1996). The site is not within an agricultural preserve nor is it under a Williamson Act Contract (Shasta County, 1998).

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 project is not located on land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, use of the site for an ILA would not convert such farmland to non-agricultural uses.

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 project site is not zoned for agricultural use nor is the site under a Williamson Act contract.

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 an ILA would not result in growth-inducing effect or other off-site changes to the environment that would result in the conversion of farmland to non-agricultural use.

III. AIR QUALITY

Setting

The Palo Cedro ILA will involve development of a permanent, aboveground facility on a parcel of approximately 0.5 acres. Project construction activities include placement of the ILA and generator shelters, installation of equipment, and onsite trenching for placement of the fiber optic cable. There will be no demolition activities because the current owners of the property will relocate the existing buildings to another site. ILA operations will include automated testing of the emergency generators, weekly trips of one vehicle to the site for maintenance, data logging, and (as necessary), refilling the generator fuel tank. This facility will oc-

cupy approximately 5,000 square feet of space, including the existing paved parking and access road.

The site is currently occupied by two aluminum buildings, which will be removed by the current property owner prior to site development. The closest public receptors are commercial buildings adjacent to the property on the east and west sides of the parcel, each located approximately 30 feet from the property line.

Table 3 provides relevant information on construction and operation activities contributing to emissions of pollutants based on the above scenario. Methodologies, algorithms, and assumptions used to make these emissions estimates 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;
- Equipment (e.g., graders, excavators, and water trucks) that will be used at the construction site. Included are the size and number of units of each type of equipment, and the numbers of hours per day and days that each piece of equipment will operate;
- Material delivery vehicles are represented in terms of number of trips per day, total number of trips, and number of one-way miles traveled; and
- The amount of material (soil) that will be disturbed during trenching operations on the proposed site.

A key assumption implicit in the estimation of fugitive dust and emissions construction equipment is that only one piece of equipment will operate at any one time. Off-site emissions due to workers commuting to and from the site, equipment delivery, and other on-road vehicles will occur simultaneously (e.g., during the same day) with emissions from on-site construction equipment. Therefore, maximum daily emissions are determined by the summation of emissions from the highest emitting piece of construction equipment and on-road emissions that occur on the same day as that piece of construction equipment is operating.

Operational parameters specified in Table 3 include the size of the emergency standby generator (300 kW), the duration of its weekly test (30 minutes per week and conservatively estimated at 30 hours/year for emissions calculations), and parameters for the approximately weekly trip to the site (conservatively estimated at 60 trips/year for emissions estimation). The testing of the emergency generator will be triggered automatically. Operating equipment at the site will be powered by electricity from the utility power grid.

Table 3 shows the emission factors and other parameters used to calculate exhaust and fugitive PM_{10} emissions for mobile equipment (U.S. EPA, 1996).

Setting

The Shasta County Air Quality Management District (ShCAQMD) is responsible for implementing state and federal air quality regulations in the community of Palo Cedro. Shasta County, along with Butte, Colusa, Glenn, Sutter, Tehama, and Yuba counties, comprise the Northern Sacramento Valley Air Basin (NSVAB). The NSVAB is currently designated as a nonattainment area for the state ambient air quality standards for ozone and PM_{10} (California EPA, 1998).

Based on monitoring data collected during the three-year period of 1995-1997 at monitoring stations in Shasta County, maximum ozone concentrations in the project vicinity did not exceed the national ozone standard (0.12 parts per million) and rarely exceed the more stringent state standard (0.09 parts per million) (California EPA, 1996 to1998). The ozone problem in Shasta County is influenced strongly by transport of pollutants from the Sacramento area, which includes Sacramento County, and portions of El Dorado, Placer, Sutter, and Yolo counties.

During three-year period 1995 – 1997, ambient PM_{10} concentrations in Shasta County did not approach the national 24-hour-average standard of 150 micrograms per cubic meter but occasionally did approach the

more stringent state standard of 50 micrograms per cubic meter (California EPA, 1996 to 1998). The PM_{10} problem 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 non-attainment, except for areas designated as non-attainment of the state PM_{10} standard. Such plans are to include strategies for attaining or maintaining the standards. The current ozone "attainment" plan is the *Northern Sacramento Valley Air Basin 1997 Air Quality Attainment Plan* (ShCAQMD, *et al.*, 1998). This ozone plan recognizes that part of the ozone problem is the result of emissions sources operating within the Northern Sacramento Valley Air Basin (NSVAB) but that the ozone problem is aggravated by pollutant transport from the Sacramento area.

The air districts from the seven counties that make up the NSVAB collectively prepared the current ozone plan. ShCAQMD represents Shasta County in the regional air quality planning process and reviews permit applications for most categories of stationary sources within the county.

The counties of the NSVAB rely heavily upon stationary source control to meet state and federal air quality standards. New Source Review (NSR) is required for most stationary sources within Shasta County (ShCAQMD Rules and Regulations, Rule 2:1, 1999). Area-source emissions are also addressed under Rule 3:16 (Fugitive, Indirect, or Non-Traditional Sources, ShCAQMD, 1999). The ShCAQMD requires that a dust control program be implemented with specific dust control measures for construction projects. This program must be submitted to the ShCAQMD prior to construction.

The project will generate emissions of criteria air pollutants during construction and operations of the Palo Cedro ILA. Construction emissions will be due to operation of heavy equipment and emissions of fugitive dust due to temporary site disturbance and travel to and from the site. The ShCAQMD does not set numerical limits for emissions from construction sites and may exempt both self-propelled construction equipment (Rule 2:5:f, ShCAQMD, 1999) and any source deemed insignificant (Rule 2:5:k, ShCAQMD, 1999) from permit requirements. Level 3 will seek exemptions from the responsible air pollution control officer per ShCAQMD Rule 2:5 (1999). Fugitive dust sources from construction activities will be controlled in a manner consistent with ShCAQMD Rule 3:16 (1999).

Operations-phase emissions will be generated by the diesel-powered emergency standby generator and negligible mobile-source emissions from weekly site maintenance visits. For operational-phase impacts, ShCAQMD recommends use of an emissions-based criteria of 25 tons per year of reactive organic compounds (ROC), NO_x, PM_{10}, and SO_x to identify projects that would result in significant increases in those non-attainment pollutants and precursors (Cirulis, 1999). ROC and NO_x are precursor emissions to regional ozone and PM_{10} formation, while SO_x is another precursor to PM_{10}. However, emergency generator engines are exempt from NSR requirements per ShCAQMD Rule 3:28:C (1999), provided the generator operates less than 100 hours per year (Rule 3:28:D, ShCAQMD, 1999) and that reporting requirements outlined in ShCAQMD Rule 3:28:F:3 (1999) are met.

ShCAQMD recommends consideration of reasonable and appropriate construction related dust control measures. ShCAQMD requires that a dust control program be implemented with specific dust control measures for construction projects (Rule 3:16 Fugitive, Indirect, or Non-Traditional Sources, ShCAQMD, 1999). This program must be submitted to the ShCAQMD prior to construction. If these measures are instituted, residual impacts are considered to be less than significant. For operational-phase impacts, ShCAQMD recommends use of an emissions-based criteria of 25 tons per year of reactive organic compounds (ROC), NO_x, PM_{10}, and SO_x to identify projects that would result in significant increases in those non-attainment pollutants and precursors (Cirulis, 1999). ROC and NO_x are precursor emissions to regional ozone and PM_{10} formation, while SO_x is another precursor to PM_{10}.

General Conformity requirements (40 CFR Part 93, July 1998) will not apply to this project since it does not involve a federal action such as the use of federal land or the need to acquire a federal permit for the site.

Evaluation

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

Site construction parameters affecting emissions from mobile sources and the emergency generator, and the resulting emissions are estimated in Table 3. Construction and operations-phase emissions are exempt from numerical regulatory thresholds, as discussed above. However, emissions levels are far below the ShCAQMD-recommended limits of 25 tons per year (tpy) each for NO_x, ROC, SO_x, CO, and PM_{10} (Cirulis, 1999).

Fugitive dust will be generated during the construction phase (Table 3) from trenching, heavy equipment operations, and wind erosion. Fugitive dust generation will vary from day to day, depending on the level and type of activity, the silt content of the soil, and the weather. Fugitive dust will be controlled in a manner consistent with the applicable air quality plans by implementing effective dust control measures throughout construction. Long-term fugitive dust emissions associated with facility operation will be negligible.

During project operations, generator testing and site maintenance visits will contribute air emissions as shown in Table 3. Operation of the emergency standby generator will be in compliance with the exemptions of ShCAQMD Rule 3:28 (1999) because it will operate less than 100 hours per year for testing maintenance and emergency use only. Compliance with the exemption requirements will be fully documented with regard to duration of use.

Normal operations at the site will generate approximately one vehicle trip to and from the site each week. The project will generate so little traffic on a long-term basis that none of the measures included in the Carbon Monoxide Maintenance Plan will apply.

Site-Specific Environmental Commitments: Level 3 will implement the following site-specific environmental commitments to ensure that the development of the Palo Cedro ILA is consistent with the goals of all applicable air quality plans:

- Submit a letter to ShCAQMD prior to project construction indicating that an emergency standby engine will be located at the project site and that exemptions from permitting requirements are sought under ShCAQMD Rule 2:5 and Rule 3:28 (based on an annual usage rate of no more than 100 hours per calendar year for maintenance purposes);
- Limit the use of the standby engine to emergency, non-utility electrical power generation purposes only (or for related testing and maintenance purposes) and maintain required documentation to support continued eligibility for ShCAQMD Rule 3:28 exemption status; and
- Submit and implement a construction emissions abatement program to minimize emissions of fugitive dust (including PM_{10}).

Level 3 will comply with requirements in the permit exemption for the emergency standby generators and will also implement fugitive dust control measures to control PM_{10} emissions during construction work, as described under Section III (b) below.

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 ☐

The Palo Cedro ILA Site lies in an area designated as non-attainment of the California Ambient Air Quality Standards for ozone and PM_{10}.
Estimates of construction-related engine emissions and emergency generator emissions are shown in Table 3. Emissions from construction activities and emergency generator operations are not subject to numerical limits. Emissions of criteria air pollutants are very low when compared to the threshold values verbally communicated by ShCAQMD (Kussow, 1999), as discussed in Section III (a).

Fugitive dust emissions during site construction activities are also shown in Table 3. There are no numerical thresholds for fugitive dust or PM_{10} emissions. Instead, ShCAQMD requires a dust control program to be submitted and implemented during construction. Level 3 will implement dust control measures to manage fugitive dust during construction.

Implementation of the Site-Specific Environmental Commitments of Sections III (a) and III (b) will comply with all applicable air quality regulations and ensure that impacts on ambient air quality are less than significant.

Site-Specific Environmental Commitments: Level 3 will develop, submit, and implement a construction dust abatement program as required by the ShCAQMD Rule 3:16. Implementation of that program will reduce potential fugitive dust impacts to less than significant levels. This program will include the following elements as applicable:

- All material excavated, stockpiled, or graded will be sufficiently watered to prevent fugitive dust from leaving property boundaries and causing a public nuisance or a violation of an ambient air standard. Watering will occur at least twice daily with complete site coverage, preferably in the mid-morning and after work is completed each day;
- All areas (including unpaved roads) with vehicle traffic will be watered periodically or have dust palliatives applied for stabilization of dust emissions;
- All on-site vehicles will be limited to a speed of 15 miles per hour on unpaved roads;
- All land clearing, grading, earth moving or excavation activities will be suspended when winds are expected to exceed 20 miles per hour;
- All inactive construction areas (previously graded areas that remain inactive for 96 hours or more) will be stabilized using non-toxic soil stabilizers approved by the Shasta County Department of Public Works in accordance with the Shasta County Grading Ordinance;
- All trucks hauling dirt, sand, soil, or other loose material will be covered or maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the trailer) in accordance with the requirements of the California Vehicle Code Section 23114;
- During initial grading, earth moving, or site preparation, a paved (or dust palliative treated) apron, at least 100 feet in length, will be constructed onto the project site from the adjacent paved roads;
- Adjacent paved streets will be swept (preferably with a water sweeper using reclaimed water) at the end of each day if substantial volumes of soil materials have been carried onto adjacent public paved roads from the project site; and
- Prior to final occupancy, ground cover will be reestablished on the construction site through seeding and watering in accordance with the Shasta County Grading Ordinance.

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

The Palo Cedro ILA site is the only PEA site under the jurisdiction of the ShCAPCD. Hence, potential total project emissions are the same as the total site emissions shown in Table 3.

Ozone impacts are the result of the cumulative emissions from all sources in the county and transport from outside. The project's small incremental contribution to the total emissions on the regional ozone and PM_{10} concentrations will not be cumulatively considerable. The emissions from construction operations and testing of the emergency standby generator will be very small compared to the emissions in the NSVAB, assuring that there will be no cumulative considerable net increase of any criteria pollutant. All but the largest individual sources emit ROC and NO_x in amounts too small to make a measurable effect on ambient ozone concentrations.

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

Sensitive receptors are defined as facilities that house children, elderly, and ill members of the population, such as schools, day-care centers, hospitals, retirement homes, hospices, and residences. The closest sensitive receptors to the ILA site are residences in a trailer park located approximately 1,500 feet to the west of the site.

Project construction emissions would be minimal. The low levels of construction emissions and the 1,500-foot distance would prevent substantial pollutant concentrations from reaching sensitive receptors. Through application of control measures, fugitive dust emissions will be kept below a level of significance.

During construction, site access will be easy and direct. Construction vehicles will not block traffic on Palo Way or other streets in the area for any significant period of time. Thus, emissions from idling vehicles in the vicinity of the sensitive receptors will be minimal.

The emergency generator will produce operation emissions during testing. Because the generator will be tested only approximately 30-minutes per week, sensitive receptors would not be exposed to substantial pollutant concentrations.

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 that may be associated with site construction activities at the Palo Cedro ILA Site will be diesel engine exhaust. The low level of construction activity would not produce enough exhaust to affect a substantial number of people in the surrounding commercial facilities. Similarly, testing of the emergency generator at the ILA site for no more than one-half hour per week will not produce sufficient exhaust or odor to be objectionable to a substantial number of people.

IV. BIOLOGICAL RESOURCES

Setting

The Palo Cedro ILA site is within the watershed of Cow Creek. On undeveloped sites in this general area, California annual grassland habitat predominates, with mixed oak woodland on higher slopes. However, the site itself is almost completely paved, with some gravel along the northern edge. It has no vegetation and two large storage buildings. The parcels east and west are similarly surfaced and developed.

The Palo Cedro site lies north of Palo Way and just east of its intersection with Deschutes Road. To the north is an open field with a road drainage ditch separating it from the proposed ILA site. The ditch is bounded with cattails (*Typha latifolia*) and the field appears susceptible to occasional flooding, as evidenced by the distribution of dock (*Rumex*), a wetland indicator. None of these adjacent resources is affected by the conditions or use of the Palo Cedro site itself.

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 ☒

A list of potential sensitive species in the area was created based upon a California Natural Diversity Database search of occurrences for Palo Cedro Quadrangle (California Department of Fish and Game, October 1999) and knowledge of the site vicinity. Known records include vernal pool plants such as slender Orcutt grass (*Orcuttia tenuis*) and woolly meadowfoam (*Limnanthes floccosa* ssp *floccosa*), the former from the Millville Plains and the latter from the Cow Creek floodplain (1.5 miles north). Table 4 lists these species and their habitat preferences. While sensitive species occur in the vicinity of the site, the Palo Cedro site itself supports no natural vegetation of any kind, and provides no habitat for any sensitive species. Although the Palo Cedro site falls within the range of protected bat species (despite the fact no protected bat species were found in the CNDB search), there are no entrances to the existing structures that could provide bats with access to the interior.

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 ☒

No 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 exists on the site.

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 ☒

There are no wetlands on the site (Figure 10). The site is connected to an established storm drain system that flows underground into Cow Creek, approximately 0.5 miles to the east.

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 almost entirely paved and surrounded by other paved sites or temporarily vacant lots. It does not provide any component of a migratory wildlife corridor or native wildlife nursery.

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 ☒

No trees occur on the site. Within the Shasta County General Plan (Shasta County, 1998), the general area is designated the Eastern Uplands planning area (Figure Pre-3, page 4.0.03), with a Current Primary use of livestock grazing. However, the immediate vicinity of the site, near the junction of Highway 44 and Deschutes Road (approximately 400 yards to the north), is rapidly urbanizing. There are no General Plan resource protection policies applicable to the site.

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 ☒

Use of the Palo Cedro ILA site will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

V. CULTURAL RESOURCES

Setting

The Palo Cedro ILA Facility site is located in the alluvial plain of Cow Creek, located one-third of a mile east. The parcel has been graded and is paved with asphalt except along the northern and eastern parcel boundaries which are covered by gravel. There are two commercial structures built on concrete pads on the parcel.

The Wintu lived in what is now Shasta and Trinity counties along the Sacramento River and in the hills to the west. The Wintu language is part of the Penutian language family. The Wintu lived in villages of 20 to 150 people. People lived in conical houses with a pole framework covered with bark. There was also a circular semisubterranean earth lodge with a center pole that was used as men's gathering place, and for sweating. There were also a separate steam house and a menstrual hut (Lapena, 1978).

The chief was a leader who also had to be a good singer and dancer. He invited other peoples to gatherings and redistributed food at gatherings. He did not hunt or fish and was given a share of food obtained by other members of the village. Gatherings were held when there was a surplus of food. At the gatherings, there was feasting, dancing, and gaming.

The most important items of technology were baskets, arrowheads, mortars, awls, bags and nets, harpoons, and wooden pipes. Deer hunting was the most important subsistence activity for men. Deer were often caught in snares or driven over cliffs. Rabbits and quail were also driven into snares and nets. A few men in each village specialized in fishing. Chinook salmon were available in the Sacramento and McCloud rivers. Freshwater mussels and clams were obtained by divers. Women collected and processed plant foods, although both men and women participated in obtaining acorns. After acorns, buckeye seeds were the most important plant food. Manzanita berries were also eaten.

Palo Cedro is located in the area occupied by the Still Water division of the Wintu.

The Wintu population was reduced by as much as 75 percent during the malaria epidemic of 1833. Interaction with the Euro-Americans who arrived in the area in the late 1840s further reduced the Wintu population. Many were forced to move to coastal reservations. The Millville Resolution of 1865 demanded that all Indians vacate the land east of the Sacramento River.

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 the *Level 3 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 Palo Cedro Facility site, and the lands within a one-mile radius, from the California Historical Resources Information System Northeast Center located at California State University, Chico. 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 ILA Facility. The records search was conducted by Information Center staff who also checked the OHP Historic Property Data File for Shasta County, the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, California Register of Historical Resources, 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 Shasta 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).

The CHRIS records search (File No. D99-61) reports that twelve surveys for cultural resources have been recorded as having taken place within a mile of the project area. The results of the records search also showed that the property had not been previously surveyed for historic resources prior to construction of the present buildings. No historic resources have been recorded within one mile of the project area. No historic resources within one mile of the current project area have been listed on the California State Historic Resources Inventory, the National Register of Historic Places, the California Historical Landmarks, California Register of Historical Resources, or the California Points of Historical Interest (California Historical Resources Information System Northeast Center, 1999).

The field survey performed by qualified archaeologists showed that there were two recent commercial structures on the property (Munns and Turner, 1999). According to representatives of the property owner, the structures date to approximately 1970.

The structure on the project parcel is not eligible for the California Register of Historical Resources. It is not associated with significant historic events or important persons, does not have distinctive architectural characteristics, nor does it have the potential to yield information important in history. In addition, the structure is less than 50 years old.

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 CHRIS records search reports that twelve surveys for cultural resources have been recorded as having taken place within one mile of the project area. The results showed that the property had not been previously surveyed for prehistoric archaeological resources. Six prehistoric archaeological sites have been recorded within a mile of the survey area. Two historic archaeological sites have been recorded within one mile of the project area. No archaeological resources within one mile of the current project area have been listed on the California State Historic Resources Inventory, the National Register of Historic Places, the California Register of Historic Resources, the California Historical Landmarks, nor the California Points of Historical Interest (California Historical Resources Information System, Northeast Center, 1999).

The field survey performed by qualified archaeologists provided no evidence of archaeological resources, due to the parcel being paved or covered with imported gravel (Munns and Turner, 1999). The ILA Facility will be installed on the existing concrete pads.

On the basis of these results, there will be no impacts to archaeological resources associated with site construction and operation activities.

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 Strand (1962), the project site is underlain by Quaternary alluvium (unit Qal). No fossil site is

recorded in the archives of the University of California Museum of Paleontology as occurring in this rock unit at the project site or elsewhere in the Palo Cedro 7.5-minute quadrangle. Moreover, no fossil vertebrate site is reported as occurring in this rock unit in the immediate project site vicinity by Jefferson (1991a, 1991b). Although there is a potential for late Pleistocene and early Holocene continental vertebrate and land plant fossil remains occurring in the subsurface at the project site, it is unlikely construction-related earth moving at the project site would extend to a depth great enough to encounter remains old enough to be considered fossilized.

Site Specific Environmental Commitment: Level 3, as part of the project design, is committed to paleontological monitoring during construction. Monitoring by a qualified vertebrate paleontologist will be initiated where earth moving extends to a depth greater than 5 feet below current grade to allow for the recovery of larger fossil remains. Rock samples will be processed to allow for the recovery of smaller fossil remains. 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 will 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.

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

The CHRIS records search and field survey provided no evidence of the presence of human remains (California Historical Resources Information System Northeast Center, 1999; Munns and Turner, 1999). If suspected human remains are encountered during construction, operations will stop until the proper official is 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 the *Level 3 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 Palo Cedro ILA site occupies a relatively flat area in the valley of Cow Creek. Palo Cedro is located in a relatively stable geologic area. The site vicinity is not located within an Alquist-Priolo zone, or landslide, liquefaction, or subsidence geologic hazard area (CDMG, 1973, 1999). Erosion activity is low to moderate. The soils are moderately expansive.

Evaluation

a)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Mines and Geology Special Publication 42. ii) Strong seismic-related groundshaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

The project site, which would not be permanently staffed, is not located within an Alquist-Priolo zone, or landslide or liquefaction geologic hazard area (CDMG, 1973, 1999). There are no active faults in the vicinity of Palo Cedro (i.e., faults exhibiting displacement within the last 11,000 years) (CDMG, 1994). The project site area can, however, experience low magnitude groundshaking associated with faults that may rupture with sufficient magnitude to affect the Palo Cedro area. A 10% probability of peak ground accelerations of 10% to 20% g in 50 years is expected in the site vicinity (CDMG, 1996). As part of Level 3's environmental commitment to this project, any potential seismic hazard would be minimized by compliance with the California seismic code standards and applicable local building and seismic codes. Because of these commitments, and because the site will not be permanently staffed, the project would not expose people or structures to substantial adverse effects attributable to these potential geologic hazards. Therefore, no impacts would occur.

Site-Specific Environmental Commitment: Any potential seismic hazard will be minimized by compliance with the California seismic code standards and applicable local building and seismic codes.

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 site is nearly flat, and is located in an area of low to moderate erosion activity (CDMG, 1973). Site development activities that might cause erosion are minimal, as the foundation of the larger of the two existing buildings will be used for ILA hut and generator shelter placement. Therefore, substantial soil erosion or loss of topsoil would not be expected.

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 ☒

The site is not within any landslide, subsidence, or liquefaction geologic hazard area (CDMG, 1973). The site is relatively flat, and the geologic units and soils on the site are not unstable. Therefore, the minimal

onsite trenching of the fiber optic cable line would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

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

The area in which the site is located has moderately expansive soils (CDMG, 1973). As part of the Proponent's environmental commitment to this project, Level 3 would minimize any potential impacts associated with these soils through compliance with structural and design regulations (i.e., compliance with the Uniform Building Code, and all local design, construction, and safety standards). Because of these environmental commitments, along with the fact that the ILA site will not be permanently staffed, no substantial risk to life or property would be created. Therefore, no impacts would occur.

Site-Specific Environmental Commitments: Level 3 would minimize any potential impacts associated with expansive soils through compliance with structural and design regulations (i.e., compliance with the Uniform Building Code, and all local design, construction, and safety standards).

e)	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

Because the proposed ILA facility would not be occupied and does not require water or sewer service, septic tanks or alternative wastewater disposal is not required. Therefore, no impacts would occur.

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), and no visible evidence of hazardous materials or releases of contaminants was observed during the site visit. There are no schools within one-quarter mile of the site. There are no airports in the vicinity of the site and the site is not located within any airport safety zone.

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 1,000-gallon, double-walled above-ground storage tank containing diesel fuel would be located on site to supply an emergency generator. This tank would comply with all federal, state, and local regulations for fuel storage, including overfill protection, vapor emissions, containment, and notification. Fuel deliveries would comply with spill protection and off-loading regulations. Waste generated by equipment maintenance would be disposed of off-site in accordance with all applicable regula-

tions. The generator and storage tank would be located inside a shelter which will be kept locked. An 8-foot tall chain link security fence will surround the facility.

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 ☒

Hazardous materials (diesel fuel) would be stored in an above-ground storage tank, with monitoring alarm and leak containment features. The tank would provide hazard containment against reasonably foreseeable upset and accidents. All individuals associated with tank refueling will undergo training in refueling and spill response, will follow well-defined procedures, and will have immediate access to spill response equipment. The generator shelter would be locked and would be enclosed inside a locked security fence. The potential for accidental releases of diesel fuel that could impact the public or the environment is remote.

c)	Would the project emit hazardous emissions 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 ☒

No existing school or proposed school is located within one-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 would not be located on a site included on a list of hazardous materials sites compiled pursuant to Section 65962.5 (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 or 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 as there is ample room onsite for staging and parking.

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 proposed structure would be located in an urbanized area zoned Community Commercial (C-2). The site is devoid of vegetation or other flammable materials that could contribute to the off-site spreading of an onsite fire. The generator would be equipped with a spark arrestor to further reduce the potential for loss, injury, or death involving fires.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The site is not located in a 100-year flood zone (Figure 9, Vista Information Solutions: *NEPA Checklist*, 1999). The site is not within an area subject to inundation by dam failure, tsunami, seiche, or mudflow.

Construction activities at the Palo Cedro ILA site are not anticipated to significantly modify drainage of stormwater from the property. However, any stormwater drainage measures that may be included in the ILA facility will be installed in accordance with Shasta County Ordinance 1608, which adopts the California 1997 UBC (Wood, 1999) and with NPDES CAF00002 Order No. 92-08-DNQ (Crowe, 1999).

Site-Specific Environmental Commitments: As appropriate, Level 3 will implement the following measures to avoid and minimize hydrology/water quality impacts on any nearby aquatic environments during construction and operation of the Palo Cedro ILA site.

- 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;
- Limit refueling activities to areas beyond 100 feet from an aquatic environment;
- Comply with 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 identifies the documents and practices in which these measures will be specified.

A Notification of Intent (NOI) will be submitted to the applicable RWQCB and the State Water Resources Control Board for construction of the Palo Cedro site under the *General Storm Water Permit to Discharge Storm Water Associated With Construction Activity*. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and will include the following: 1) Project Description; 2) Best Management Practices (BMPs) for Storm Water Pollution Prevention; 3) Inspection, Maintenance, and Record Keeping; and 4) Training.

Although the area of disturbed ground on the Palo Cedro site will be less than five acres, and will therefore be less than the minimum size requirement for a SWPPP, the cumulative area of the total ILA, 3R, and D-Node sites associated with this project is greater than five acres. Accordingly, an NOI will be submitted, and a SWPPP will be prepared.

Evaluation

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 stored in a 1,000-gallon, double-walled, above-ground storage tank, with monitoring and leak containment features. The tank would provide hazard containment against reasonably foreseeable upset and accidents. 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 will not extract groundwater nor will the project interfere with groundwater recharge, the site is not within a groundwater recharge area. Because the concrete pad of an existing building will house the ILA huts and generator shelter, there will be no increase in the amount of impervious surface onsite. Therefore, the project will not contribute to depletion of groundwater supplies.

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 ☒

The project would not alter the existing drainage pattern of the site or area because the ILA huts and generator shelter will be placed on the pad of an existing building. There will be no increase in the amount of impervious surface onsite.

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 ILA huts and generator shelter will be placed on the pad of an existing building. There will be no increase in the amount of impervious surface onsite.

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 ☒

The project would not create or contribute runoff water because the ILA huts and generator shelter will be placed on the pad of an existing building. There will be no increase in the amount of impervious surface onsite.

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

No impacts to water quality are expected as a result of this project. Because the ILA huts and generator shelter will be placed on the pad of an existing building, the site will be only occasionally staffed (for a brief period each week), and there will be no water or sewer hookups, the project would not result in polluted runoff, nor generate wastewater, nor discharge substances that could contaminate water.

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. The project is not located within a 100-year floodplain (Figure 9, Vista Information Solution: *NEPA Checklist*, 1999).

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 project is not located within a 100-year floodplain (Figure 9, Vista Information Solutions: *NEPA Checklist*, 1999).

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 ☒

There are large dams in Shasta County, and the largest, Shasta Dam, would inundate most of the City of Redding, all of the City of Anderson, and many other towns and development downstream along the Sacramento River if it failed. However, the town of Palo Cedro and the Palo Cedro ILA site would not be affected according to the Shasta County Planning Department. The failure of other dams in Shasta County would also not affect the site (Gonzalez, 1999).

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 ☒

The Shasta County General Plan does not specifically discuss tsunamis, seiches, or mudflows. However, the site is too far from the ocean to possibly be impacted by a tsunami. A seiche from Lake Shasta would have less impact than failure of Shasta Dam, and since the site would not be impacted if the dam failed, it would not be impacted from a Shasta Lake seiche. The site is flat, surrounded by flat land for several miles, and therefore not subject to mudflows. Finally, the site will not be permanently manned and even if a seiche or mudflow did occur, there would not be significant risk to human life.

IX. LAND USE PLANNING

The general plan land use designation for the project site is "Commercial" (Shasta County, 1998) which provides for various commercial businesses (Lusso, 1999).

The project site is zoned "Community Commercial (C-2) District" which permits retail sales and various commercial services (Shasta County, 1998). The Shasta County land use designation "Commercial" allows for the C-2 zoning, therefore the zoning of the project site is compatible with the general plan. The surrounding zoning also consists of C-2 District.

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 project will be located in an already developed commercial area on a site previously used for commercial purposes. It will therefore not divide an established community.

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 Shasta County land use designation for the site is "Commercial" (Shasta County, 1998), which allows the "Community Commercial District" zoning on the site (Lusso, 1999). The Shasta County zoning is thus compatible with the general plan land use. The project will require an administrative permit issued by the Shasta County Planning Department. Because public utilities are permitted with an administrative permit within "Community Commercial District" zoning, 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 ☒

There are no habitat conservation plans or natural community conservation plans that affect the site.

X. MINERAL RESOURCES

Setting

The project site is not located in an area designated by the state or Shasta County for mineral resources (Shasta County General Plan, 1998).

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 construction on the already-developed 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 construction on the already-developed site would not result in loss of a locally important mineral resource.

XI. NOISE

Setting

The Palo Cedro ILA Site is located in the community of Palo Cedro in Shasta County (Figure 2). The area is zoned as Community Commercial (Shasta County, 1998). Existing commercial uses border the property to the east and west. Public receptors are located on both of these parcels at a distance of approximately 30 feet from the property line (Figure 8).

The site is not within the airport land use plan, and there are no private airports near the site. An estimate of daytime and nighttime ambient noise levels (60 and 52 dBA, respectively) was derived from Schomer and Associates (1991) as typical of sites designated as "moderate commercial and industrial areas."

The Palo Cedro ILA Site will involve development of a permanent, above ground facility on a site of approximately 0.5 acres. Project construction activities include construction of the ILA and generator shelters, installation of equipment, and onsite trenching for placement of the fiber optic cable. ILA operations will include automated testing of the emergency generators, weekly trips of one vehicle to the site for maintenance, data logging, and (as necessary) refilling of the generator fuel tank. Approximately 5,000 square feet of the 0.5 acre property will be re-developed, resulting in substantial buffering of the surrounding uses from noise caused by project construction and operation (see Figure 7 for the "conceptual plot plan").

Noise will be generated from both construction and operation of the ILA facility. Table 3 provides relevant information on construction and operation activities and equipment contributing to noise. Ambient noise is considered in the noise level analysis.

Table 3 includes the size of each type of heavy construction equipment and the numbers of hours per day that each piece of equipment will operate. A key assumption implicit in the evaluation of noise impacts is that only one piece of heavy equipment will operate at any one time. Noise from off-site construction activities, associated with personnel vehicles and material delivery and refuse dump 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. Therefore, maximum construction noise levels at each site are based on the noisiest piece of construction equipment. The maximum potential noise (at full engine power) for normally-muffled diesel-powered construction equipment of up to 200 horsepower (hp) measured at 50 feet is 84 dBA (U.S. EPA, 1971). The resulting maximum construction noise level at the closest receptor will be 88 dBA (at a distance of 30 feet). Detailed methodologies, algorithms, and assumptions associated with the noise analysis are provided as Attachment A.

Shasta County restricts the hours of construction to the period between 7:00 am and 7:00 pm (Gonzales, 1999). There is no numerical threshold for noise from construction sites.

Operational parameters related to noise include the size/gross hp and period of operation (approximately 30 minutes/week) of the emergency standby generator (Table 3). The generator will be automatically tested weekly. The maximum noise level at the closest receptor was estimated by adjusting the noise level for a receptor distance of 80 feet which includes a 50-foot minimum setback distance from the site boundary with the nearest public receptors (commercial uses at 30 feet to the east and west). This results in a level of 60 dBA Leq using the value of 75 dBA for the noise level at 5 feet from a 449 hp generator in a noise limiting generator housing.

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 at the closest receptor during construction because no construction thresholds exist. Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the period 7:00 am to 7:00 pm. Because the facility will utilize prefabricated structures, the construction period will be brief, up to two months, as shown in Table 3. Since only 5,000 square feet of the 0.5-acre site will be developed, the developed area will be surrounded by buffer zones on all sides (Figure 7); therefore, the actual noise level at the closest receptor will be less.

Based on the close proximity of the nearest receptor, the generator location will be set back at least 50 feet from the boundaries with the nearest receptors and the generator will be housed in a specially designed enclosure which reduces the noise level to 75 dBA at 5 feet. This will achieve a maximum noise level of 60 dBA Leq, which is above the Shasta County standard of 55 dBA Leq. However, this apparent exceedence is an artifact of conservative assumptions regarding ambient daytime noise level, which is itself higher than the standard. In fact, generator testing will increase Leq noise levels by only 0.3 dBA. Level 3's inclusion of a noise-insulating generator shelter into the design of the Palo Cedro ILA facility will ensure consistency with the general plan. Because Level 3 will incorporate this design feature as a site-specific environmental commitment, and because generator operations will be limited to only 30 minutes per week for normal maintenance, impacts from generator noise will be less than significant.

Site Specific Environmental Commitments: Level 3 will implement the following actions to ensure that noise-related impacts are maintained at less than significant levels:

- Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the period 7:00 AM to 7:00 PM.; and
- Level 3 will comply with the local operation noise ordinance by a combination of the following two design measures:
  (1) installing the generator a minimum of 80 feet from the closest receptor; and
  (2) providing a special 75 dBA generator shelter.

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 nor operations would 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**.** This work area will be set back a significant distance from the project boundary as shown in Figure 7 so there will be a less than significant impact from groundborne vibrations or noise during construction.

For the operational period (approximately 30 minutes a week) the generator will cause only localized vibration intermittently. The generator will be mounted on the existing concrete pad with rubber vibration isolators. These vibration isolators result in a reduction of groundborne vibration by more than 95 percent (Ace Mountings Company, 1999). The buried innerduct will not generate perceptible vibration 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 ☒

Construction noise will be temporary, lasting no more than two months. Noise emitted during operations would be intermittent and below the regulatory threshold. The project would, therefore, include no permanent source of ambient noise and would have no permanent impact on ambient noise levels in the vicinity.

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 ☐

Temporary increases in ambient noise levels will occur during the construction period of up to two months, and will comply with the local construction noise ordinance for work hours. Weekly testing for a period of approximately 30 minutes and during power outages and for maintenance activities will generate operational noise. This intermittent noise will not be a substantial increase in ambient noise levels because the increased distance from the boundary with the nearest commercial facility will create a buffer area around the generator (Figure 7) and the location and enclosure of the generator will comply with noise regulations.

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, nor is it 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 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 two miles of a private airstrip.

XII. POPULATION AND HOUSING

Setting

The site is located within Shasta County which had a January 1999 population of 165,400. This represents a 0.8 percent increase from January 1998 (California Department of Finance, 1999). Redding is the nearest incorporated city, and is located approximately 5 miles west of the site. The population of Redding was 78,700 as of January 1999, an 0.8 percent increase from January 1998. The nearest housing is located approximately ¼mile west of the site, across Deschutes Road and on the west side of a PG&E substation (which is shown on Figure 5).

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 or 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 any people.

XIII. PUBLIC SERVICES

Setting

The site is located in the unincorporated community of Palo Cedro in Shasta County. Police protection is provided by the Shasta County Sheriff's Department. Fire protection is provided by the California Department of Forestry. The Belle Vista Water company provides water, PG&E provides electricity, and Pacific Bell provides phone service to the site. A recently constructed high school is located approximately 1 mile north of the site. A grammar school is located approximately ½ mile south of the site, and a pre-school is located approximately ¾ mile north of the site.

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 ☒

Since existing fire and police facilities are already protecting the site, development of the ILA facility would not result in a need for new or physically-altered police and fire protection facilities, nor would it affect response time or other performance objectives. The site will not be continuously manned and would therefore not increase the use of schools, parks, and other public facilities.

XIV. RECREATION

Setting

The nearest public recreational facility is a golf course located approximately 1 mile to the east.

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 ☒

Since the project will not be permanently staffed, it would not increase the use of existing parks or other recreational facilities.

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. Because the project will not be continuously manned, it will not require the construction or expansion of recreational facilities.

XV. TRANSPORTATION/TRAFFIC

Setting

The site is located adjacent to Palo Way, a private road that dead-ends west of the site. Palo Way is a two lane east-west road with no street markings. There are no curbs along Palo Way; therefore, site entry location appears to be optional. Palo Way has no parking restrictions. There is a stop sign on Palo Way at its intersection with Deschutes Road. Deschutes Road is a four-lane north-south road. The general plan (Shasta County, 1998) designates Deschutes Road as a "four-lane arterial." The general plan also designates Deschutes Road as a bikeway corridor.

State Route (SR) 44 is an east-west highway located approximately ¼mile north of the site. The eastbound ramp onto SR 44 bounds the north side of the adjacent vacant parcel to the north of the project site.

Three restaurants are located on Palo Way. As a result, traffic on Palo Way is heaviest during the lunchtime hours.

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 site for approximately three months. The average number of commuting workers is expected to be seven. The workers will commute during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and park on the site. Occasionally, trucks will deliver equipment and materials to the site and haul construction debris from the site to recycling centers or landfills. The two aluminum buildings on the site will be dismantled and hauled away by truck to another site. These truck trips for equipment, materials and building relocation will be infrequent and off-peak from area traffic flows. The offsite impacts from construction are therefore expected to be less than significant. During operation of the site, one service person would visit the site approximately weekly. 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 be accessed from Palo Way which currently has neither curbs nor gutters. Palo Way does not have dangerous curves or intersections. The driveway to the ILA site would be located in a manner consistent with Shasta County Department of Public Works requirements.

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 require offsite parking or staging, either during construction or operation of the ILA facility.

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 site would not conflict with any adopted policies, plans, or programs supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

Overhead utility lines are located on both sides of Palo Way running in an east-west direction. A power pole is located just outside the southwest property boundary supporting power lines running to the building on site. A sewer drain runs along the west boundary of the site (outside the property line).

A small amount of waste (estimated at 70 cubic yards or 47 tons) will be generated during construction. This will not include any demolition debris, removal of which is the responsibility of the current owner of the property. Station construction will not proceed until demolition debris has been cleared from the site. Every attempt will be made to minimize waste generation. During operation of the ILA facility, there should be no appreciable generation of solid waste since the site will not be permanently staffed and site visits will be infrequent (one per week) and of short duration (one to several hours).

Solid waste is collected by the Anderson-Cottonwood Disposal Service, which is under franchise to the City of Anderson. The waste is transported to, and deposited in, the Shasta County owned West Central Landfill, located approximately 10 miles east of the project site (Gehres, 1999). Phase I of the landfill is permitted for in take of 600 tons per day and average current intake is about 350 tons per day. The remaining life of Phase I is about four years. A Phase II expansion of the landfill is in progress which will extend the life of the landfill to 20 years. Shasta County also has plans for Phases III, IV, and V that will extend the life of the landfill to approximately 100 years.

Construction debris for the project site area is to be disposed of in the Richard W. Curry Landfill. Based on personal communication with Dan Little, Shasta County Department of Public Works, the permitted daily capacity of this landfill is 700 tons with average daily intake of 630 tons.

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 produce wastewater and would therefore not increase the burden on wastewater treatment. The site would not be occupied on a continuous basis and would not require toilet facilities. During construction, portable chemical toilets would be used by construction workers.

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 produce wastewater and therefore it would not increase the burden on wastewater treatment facilities. The site would not be occupied on a continuous basis.

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 quantity of stormwater runoff is not expected to increase compared to existing runoff, as there will be no increase in the area of impervious surface onsite. Therefore, the project would not increase the burden on storm water 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 ☒

The project would not produce wastewater and, therefore, 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 ☒

The project would not generate significant amounts of solid waste. The quantity of solid waste generated during construction and clean-up of the site after construction is estimated to be 70 cubic yards (approximately 47 tons). The Richard W. Curry Landfill where the construction waste will be deposited has a permitted capacity of 700 tons per day and is currently averaging 650 tons per day. Waste generated during operation of the unmanned facility will be minimal but the West Central Landfill where the waste would be deposited has a permitted capacity of 600 tons per day and is currently averaging 350 tons per day.

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 ☒

The project would not generate significant amounts of solid waste. Landfills where waste will be deposited will be in compliance with all applicable solid waste laws. The project will also comply with all applicable solid waste laws.

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Tables

Figures

Photo Plates

Photo A View of Proposed ILA Site from Palo Cedro Inn (Restaurant) Facing Northeast (Approximately 110 feet from Site)
Photo B View of Proposed ILA Site from Northwest Corner of Site Facing South
Photo C View from On-Site Facing North
Photo D View of East Side of Proposed ILA Site from Southeast Corner Facing North

Attachment

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