Site 9. SAN ARDO ILA

Environmental Checklist

ENVIRONMENTAL CHECKLIST

1. Facility Title:
Level 3 Communications Infrastructure Project, San Ardo ILA

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

3. Contact Person and Phone Number:
Gary Finni, Level 3 Communications, LLC
6689 Owens Drive, Suite A, Pleasanton, CA 94588 (925) 398-3000

4. Facility Location:
The site is located in an industrial area in the unincorporated community of San Ardo in Monterey County, California. The 2.85-acre parcel located at the northeast intersection of Cattlemen Road and Short Street. It is bordered by vacant land to the north, the Union Pacific Railroad (UPRR) right-of-way (ROW) to the east, Short Street to the south, and Cattlemen Road to the west. A site vicinity map is provided as Figure 9-1; a plot plan is provided as Figure 9-2. Additional maps and detail are provided in the PEA (PEA, 2000, following p. 9-41).

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

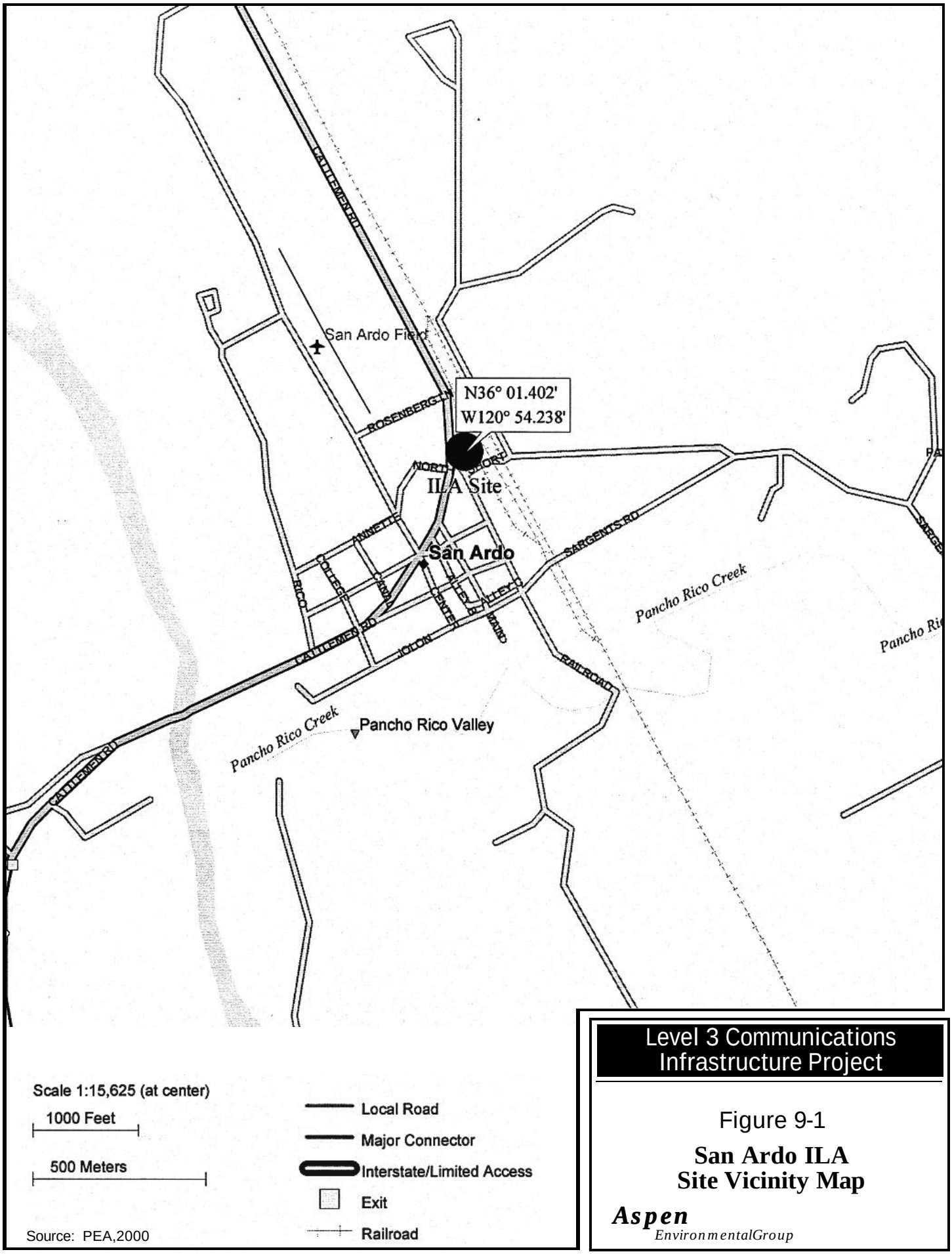
6. General Plan Designation: Industrial

7. Zoning: Heavy Industrial (HI)

8. Description of Facility:
This checklist evaluates the design, construction, and operation of the San Ardo ILA facility, which will be located on vacant, disturbed land outside of existing utility corridors. The facility, which will include an In Line Amplification (ILA) structure, a generator shelter, an access driveway and limited parking space will require development of approximately 5,000 square feet of the parcel. The "development window" within which the facility will be sited is shown in Figure 9-2.

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 along the network.

The ILA station 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 height. The set of four huts will be installed on a 24 feet by 72 feet (1,728 square feet or 0.04-acre) concrete pad, with the huts attached side-by-side to form a continuous building. These structures will be assembled at the site.



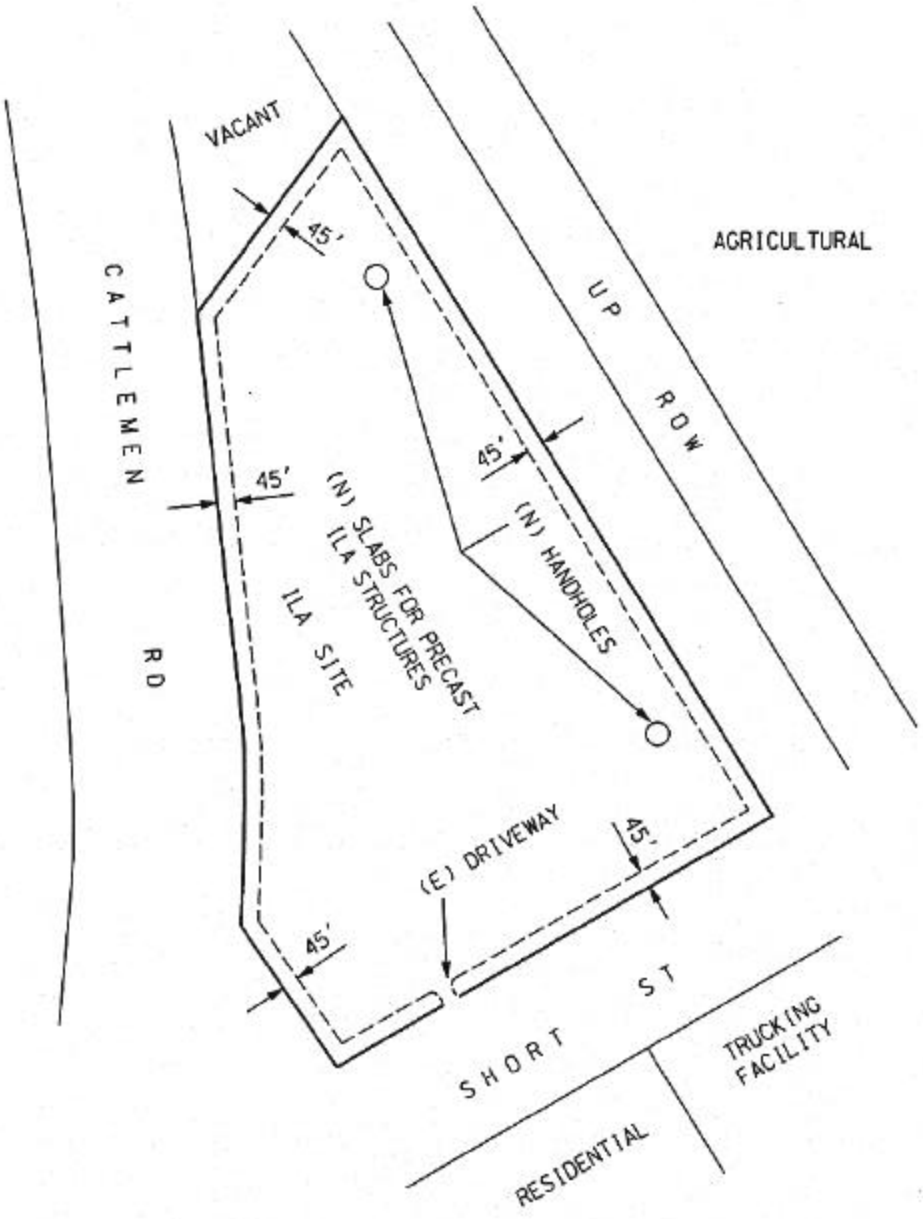
Level 3 Communications Infrastructure Project

Figure 9-1

San Ardo ILA Site Vicinity Map

Aspen Environmental Group

ELECTRICAL, TELEPHONE, WATER AND SEWER TO BE DISTRIBUTED EITHER FROM ON-SITE EXISTING OR FROM EXISTING IN STREET PER NEC AND LOCAL CODES (ON-SITE UTILITIES WILL BE DISTRIBUTED UNDERGROUND)



ACCESS IS EXISTING FROM SEVERAL DIRECTIONS

UTILITIES TO BE DISTRIBUTED UNDERGROUND FROM EXISTING ON-SITE PER NEC AND LOCAL CODES

REQUIRED SETBACKS: 45'

Source: PEA,2000

Level 3 Communications Infrastructure Project

Figure 9-2

San Ardo ILA Conceptual Plot Plan

Aspen *EnvironmentalGroup*

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 and 24 feet long (288 square feet) and 10 feet high. It will be assembled at the site and installed on a concrete foundation. 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. Tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote). 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.

Each generator will be equipped 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 could not be managed by Level 3 personnel, a contractor will be called to respond.

Technical staff will be trained in safety and spill-response procedures that should be implemented during diesel oil 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, a 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(s) for the generator tank(s), 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. Each will be visited approximately once a week for routine maintenance and data downloading (assumed for analysis purposed to be 60 trips per year). No additional buildings will be constructed. Control and maintenance functions will occur within the proposed facilities. Fencing around the ILA facility will be of chain link construction and will be nine feet tall.

The San Ardo ILA will require electricity and telephone lines. Utility lines supporting these capabilities are located overhead on wooden poles with wooden crossarms. These lines run along Cattlemen Road on the western edge of the site. Normal electrical power will be provided, consisting of 400-amp, 480-volt, three-phase service. Telephone service would be provided at the site by either hard-wired, cellular or satellite-link service. All onsite utility lines will be run underground. No water or sewer attachments would be required. Stormwater drainage and fire protection equipment would be installed per local codes. Access to the site would be provided from Cattlemen Road.

Site development will include minimal clearing of buffer strips, demolition of existing structures (small wooden building, tower, and truck scale), minimal grading to level the building and shelter sites and to provide an access driveway and parking area, pouring of the foundations, delivery and assembly of prefabricated components, installation of utility connections, and erection of

perimeter fencing. Estimates of solid waste include 4 cubic yards of building demolition refuse, 8 cubic yards of tower demolition refuse, 23 cubic yards of truck scale demolition refuse and 40 cubic yards of dirt associated with grading and foundation work. Total solid waste generation during construction is 75 cubic yards (approximately 50 tons). Removal of old machinery currently occupying the site is the responsibility of the current owner. The fiber optic cable to which the ILA will be attached is located along the east side of the site on the UPRR ROW, which forms the eastern boundary of the site. 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 then back-filling the trench.

Based on conversation with Delinda Robinson, Land Use Technician for the County of Monterey, (and a follow-up visit to county offices, there are no current projects within two miles of the San Ardo ILA site, nor are any currently planned (PEA, 2000, p. 9-2).

9. Surrounding Land Uses and Environmental Setting:

The site is bordered by vacant land to the north, with Cattlemen Road along the western edge of the parcel. Residential units are located on the west side of Cattlemen Road. To the east of the site is the Union Pacific Railroad (UPRR) Right-of-Way (ROW), with an agricultural field beyond. To the south of the site is Short Street, beyond which is a parcel containing a trucking facility to the east and residential uses to the west. The environmental setting for each natural and physical resource topic is described in Sections I – XVI of the checklist.

10. Other Agencies Whose Approval is Required:

The site is located within the jurisdiction of the County of Monterey. It is also located within the Monterey Bay Unified Air Pollution Control District. Because the site is within a "Heavy Industrial" zone, the project is permitted as a "public utility structure" and is allowed with a Use Permit. The project will also require that a preliminary seismic and geologic hazard report be prepared by a registered geologist and submitted to the County. The Use Permit application would not be deemed complete until this report is submitted. The project will require the submittal of a General Development Plan, which will be submitted for review and approval prior to or concurrent with approval of the Use Permit. The plan shall address the long range development and operation of the facilities, and includes an application with questions regarding environmental impacts of the project (PEA, 2000, p. 9-3).

Specific local policies relevant to each of the sixteen environmental impact issue areas are provided in Table 9-1 of the PEA (PEA, 2000, follows p. 9-41). 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.

11. Determination:

On the basis of the analysis of this Initial Study, the proposed facility would not have a significant effect on the environment because all potential impacts have been mitigated to a level of less than significant through either (1) the additional mitigation measures recommended in this checklist or (2) the Environmental Commitments described below.

The proposed facility is an element of the project addressed in an Application for Modification of an existing Certificate of Public Convenience 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 ROW. The project will incorporate all of

mitigation measures outlined in the previous Decision, as well as those of this environmental review, into its design and construction of the project. 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
- 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
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the PEA (PEA, 2000, Volume 3).

I. AESTHETICS

Setting

The site is located in a predominantly rural landscape dominated by naturally-appearing land forms and vegetation and the built structures of the San Ardo town center. Existing visual quality and viewer sensitivity are considered moderate while viewer exposure is rated moderate to high. The site's visual absorption capability is considered low to moderate (see the Visual Analysis Data Sheet at the end of this Initial Study). Project-induced visual contrast will be moderate and the proposed ILA facility will result in significant visual impacts unless Mitigation Measures 9-I-1 through 3 are adopted. Specifically, the industrial appearance and geometric form of the proposed project has the potential to degrade the existing visual character of the project vicinity (see I.c below) and impair panoramic views to the rolling hills to the east (see I.a below). Also, the proposed facility lighting has the potential to create nighttime glare visible to adjacent residences and to motorists on Cattlemen Road (see I.d below). Figure 9-I-1 shows the location of the Key Viewpoint from which the Visual Analysis Data Sheet was developed. Figure 9-I-2 shows the view from the Key Viewpoint. These figures are found at the end of this Initial Study checklist. Also, see PEA Photos 9-A through D for additional views.

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 ☐

a) Less Than Significant With Mitigation Incorporation. Scenic vistas are available to residents and motorists on Cattlemen Road. Views are generally drawn to the east across the proposed site to the hills beyond. The proposed facilities would partially obstruct those views resulting in a moderate level of view impairment. Additional mitigation to reduce impacts to lell than significant are presented at the end of this section (see end of this Section).

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 ☒

b) No Impact. The site is not located on, or in close proximity to, scenic resources such as trees or rock outcroppings. The site is also not visible from any designated scenic highway or roadway.

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 ☐

c) Less Than Significant with Mitigation Incorporation. Although the adjacent railway, road infrastructure, and abandoned facilities are visible in the foreground of views available to residents and motorists on Cattlemen Road, the panoramic nature of those views provide an overall impression of a rural landscape dominated by naturally appearing middleground to background features. Viewer exposure would be moderate to high due to the proposed project's foreground proximity to Cattlemen

Road. The proposed facilities would be more prominent in views from Cattlemen Road than the existing structures. The geometric form, vertical and horizontal lines, and industrial appearance of the ILA structures would be inconsistent with the existing, more naturally-appearing landscape beyond the site to the east, resulting in a moderate degree of visual contrast. Additional mitigation to reduce impacts to less than significant are presented at the end of this section.

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 ☐

d) Less than Significant with Mitigation Incorporation. Exterior lighting of the ILA facility will include lamps at each structure entrance. Given the relative lack of exterior lighting along the east side of Cattlemen Road, such lighting has the potential to create nighttime glare if not properly controlled. Additional mitigation to reduce impacts to less than significant are presented below.

The following additional mitigation measures are recommended to minimize potential visual impacts to a level of less than significant:

Mitigation Measure 9-I-1: All project facilities including buildings, fencing, and signs, will be painted with neutral earth-tone colors that will blend with the existing landscape. A specific painting plan will be submitted for CPUC approval prior to issuance of a construction notice to proceed to ensure that the proposed colors do not unduly contrast with the surrounding landscape colors. All treatments will be in non-reflective colors. The painting plan will also be submitted sufficiently early to ensure that any precolored structures can have colors approved and included in bid specifications for buildings. Adherence to the approved painting plan will be determined by the CPUC construction monitor.

Mitigation Measure 9-I-2: Appropriate tree and shrub species will be planted along the north, west, and south sides of the ILA site to soften the industrial appearance of the ILA facility and to more effectively blend the facility with the existing landscape as viewed from Cattlemen Road and Short Street. A specific landscaping plan will be prepared showing the location of proposed landscaping, the varieties and sizes of plants to be used, and the proposed time to maturity for each species. The landscaping plan will be submitted for CPUC approval prior to issuance of a construction notice to proceed. Adherence to the approved landscaping plan will be determined by the CPUC construction monitor.

Mitigation Measure 9-I-3: Except as required by security and worker safety requirements, night lighting will be hooded to direct illumination downward and inward toward the areas to be illuminated in order to minimize nighttime light and glare, backscatter to the nighttime sky, and visibility of lighting to residents and motorists on Cattlemen Road. A specific lighting plan consistent with operational and safety needs will be submitted to the CPUC for approval prior to issuance of a construction notice to proceed. The plan will include provisions for timed and/or motion detection-controlled switches. The lighting plan will also propose a procedure to resolve any lighting complaints. Adherence to the approved lighting plan will be determined by the CPUC construction monitor.

II. AGRICULTURAL RESOURCES

Setting

The site does not hold any special agricultural designations and is not currently used for agricultural purposes. The site is undeveloped and has previously been used as an agricultural distribution center

but is presently out of service. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant agricultural impacts are anticipated as a result of project implementation.

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 ☒

a) No Impact. The site is not located on land designated as Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. Therefore, the proposed project would not result in the conversion of 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 ☒

b) No Impact. The 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 ☒

c) No Impact. The site was previously used as an agricultural distribution center but is designated industrial in the South County Area Plan and does not retain properties of significant agricultural value (see [a] and [b] above). Project construction would not result in the conversion of farmland or significant agricultural potential to a non-agricultural use.

III. AIR QUALITY

Setting

The proposed project is in the North Central Coast Air Basin, which is currently designated as a non-attainment area for the state ambient air quality standards for ozone and PM10. The North Central Coast Air Basin is also designated as a "maintenance" area for the national one-hour-average ozone standard, which denotes that it had once been designated as a nonattainment area for that standard as well. There are a number of residences located near the site. The distance of the closest air/noise receptor to the closest boundary of the site is 40 feet.

MBUAPCD prepares these air quality plans, and has permit authority over most types of stationary sources in the study area.

New stationary sources of air emissions are required to obtain an authority to construct and permit to operate under MBUAPCD Rule 200 (Permits Required). Under Rule 201 (Sources Not Requiring Permits), certain sources (e.g., some aboveground fuel storage tanks) do not require an operating permit. Under MBUAPCD Rule 207 (Review of New or Modified Sources), new sources are required to be constructed with Best Available Control Technology (BACT) to minimize emissions of nitrogen oxides (NO_x). By controlling NO_x emissions, the NSR BACT requirements also indirectly reduce PM10 emissions because NO_x is a precursor to PM10 as well as to ozone. In addition, MBUACPD would require sources such as standby desel engine to use fuel meeting the latest specifications established by the Air Resources Board for diesel fuel.

In addition to BACT, NSR typically requires offsets if a new source will emit greater than specified quantities of pollutants after implementation of BACT. MBUAPCD allows for an exemption for equipment used exclusively for emergency, standby, non-utility electrical power generation and not used in conjunction with any utility-voluntary-demand-reduction program. In such cases, offsets are not required as long as operation of the standby engine for maintenance and testing purposes and operation does not exceed 60 hours per year. To receive continued exemption from the offset requirements, the project Proponent would be required to document the hours of equipment use on an annual basis.

For evaluating construction-phase air quality impacts, MBUAPCD recommends using an emissions-based significance criterion (threshold) of 82 pounds per day of PM10.

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?	☐	☐	☒	☐

a) Less than Significant Impact. Site construction parameters affecting emissions from mobile sources and the emergency generator, and the resulting emissions are estimated in Table 9-III-1 (PEA, 2000, Table 9-3, follows p. 9-41). These resulting emissions are well within regulatory thresholds. These emissions are, therefore, in compliance with the applicable air quality plan.

Fugitive dust would be generated during the construction phase from grading activities and travel of heavy equipment over temporary roads at the construction site. Fugitive dust generation would vary from day to day, depending on the level and type of activity, the silt content of the soil, and the weather. Fugitive dust would be controlled in a manner consistent with the applicable air quality plans by implementing effective dust control measures throughout the construction phase. Long-term fugitive dust emissions associated with facility operation will be negligible. The project would include use of a graveled road on-site to provide access directly to the buildings and equipment.

Level 3 would be required to obtain authority to construct and permit to operate for the standby engine under MBUAPCD Rule 200. The standby engine would normally be operated ½hour per week for testing and maintenance purposes, and would also operate during emergencies when utility power is unavailable.

The proposed standby engine would also be subject to MBUAPCD's NSR requirements under Rule 207, which applies to all new stationary sources subject to Rule 200**.** No permit would be required for the aboveground diesel storage tank under Rule 201 (Sources Not Requiring Permits).

TABLE 9-III-1 AIR QUALITY CALCULATIONS

Construction Engine Emissions

SOURCE	SIZE / GROSS HP	DAILY AMOUNT (1) (hrs or trips)	NUMBER OF DAYS	NUMBER OF UNITS	ONE-WAY DISTANCE (miles)	NO_x EF (2)	NO_x Daily (lbs/day)	NO_x Total (tons)	ROG EF (2)	ROG Daily (lbs/day)	ROG Total (tons)	PM_{10} EF (2)	PM_{10} Daily (lbs/day)	PM_{10} Total (tons)	SO_x EF (2)	SO_x Daily (lbs/day)	SO_x Total (tons)	CO EF (2)	CO Daily (lbs/day)	CO Total (tons)	NOTES
Demolition (35 cy)																					
Excavator	84	8	1	1	-	774	14	0.007	64	1.1	0.001	13	0.2	0.0001	58	1.0	0.001	79	1.4	0.001	6
Equipment Delivery Truck	Low boy	1	1	-	30	11.3	1.5	0.001	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.0	0.000	14.0	1.9	0.001	7
Semi-end Dump Trucks	20 ton	2	1	-	100	11.3	10	0.005	2.2	1.9	0.001	0.59	0.5	0.000	0.31	0.3	0.000	14.0	12	0.006	7
Worker Light Truck	Light	2	1	-	30	1.00	0.3	0.0001	0.35	0.1	0.0000	0	0	0	0.06	0.02	0.00001	7.22	1.9	0.0010	7
Maxima and Subtotals (Demolition)							25	0.013		3.5	0.0017		0.8	0.0004		1.3	0.0007		17.5	0.009	
Site Grading (40 cy)																					
Backhoe Loader	200	4	2	1	-	2370	21	0.0209	180	1.6	0.0016	15	0.13	0.00013	135	1.2	0.0012	205	1.8	0.0018	6
Vac Truck	153	8	2	1	-	1660	29	0.0293	110	1.9	0.0019	15	0.26	0.00026	105	1.9	0.0019	110	1.9	0.0019	6
Surveying Lt-Heavy Duty Truck	117	6	3	1	-	780	10	0.0155	72	1.0	0.0014	44	0.6	0.00087	85	1.1	0.0017	105	1.4	0.0021	6
Lt-Heavy Duty Truck	10 cu yd	2	2	1	30	11.3	3.0	0.0030	2.2	0.58	0.00058	0.59	0.16	0.00016	0.31	0.08	0.0001	14	3.7	0.0037	7
Worker Light Truck	175	3	2.5	1	30	18.4	7.3	0.00915	4.4	1.73	0.00216	0.84	0.333	0.000417	0.31	0.123	0.0002	35	13.7	0.0171	6
Equipment Delivery Truck	Low boy	3	2	-	30	11.3	4.5	0.0045	2.2	0.9	0.0009	0.59	0.23	0.00023	0.31	0.12	0.0001	14	5.6	0.0056	7
Worker Light Truck	Light	2	9	-	30	1.0	0.26	0.00119	0.35	0.09	0.00042	0	0	0	0.06	0.02	0.0001	7.2	1.9	0.0086	7
Maxima and Subtotals (Site Grading)							44	0.083		5.2	0.0090		1.3	0.0021		2.2	0.0052		26.9	0.041	
Pad Construction (270cy)																					
Cement Truck	10 yd3	4	2	-	30	11.3	6.0	0.0060	2.2	1.2	0.00116	0.59	0.31	0.00031	0.31	0.2	0.0002	14	7.4	0.0074	7
Gravel Truck	10 yd3	4	1.5	-	30	11.3	6.0	0.0045	2.2	1.2	0.00087	0.59	0.31	0.00023	0.31	0.2	0.0001	14	7.4	0.0056	7
Worker Light Truck	Light	2	2	-	30	1.0	0.3	0.0003	0.35	0.1	0.00009	0	0	0	0.06	0.0	0.0000	7.2	1.9	0.0019	7
Maxima and Subtotals (Pad Construction)							12.2	0.01		2.4	0.0021		0.62	0.00055		0.3	0.0003		16.8	0.01	
Trenching & Utility Installation (350cy)																					
Excavator	84	8	12	2	-	774	27	0.164	64	2.3	0.0136	13	0.5	0.0028	58	2.0	0.0122	79	2.8	0.017	6
Equipment Delivery Truck	Low boy	1	2	-	30	11.3	1.5	0.001	2.2	0.3	0.0003	0.59	0.08	0.0001	0.31	0.0	0.0000	14	1.9	0.002	7
Worker Light Truck	Light	2	12	-	30	1.0	0.3	0.002	0.35	0.1	0.0006	0	0	0	0.06	0.0	0.0001	7.2	1.9	0.011	7
Maxima and Subtotals (Trenching and Utility Installation)							29	0.17		2.7	0.0144		0.55	0.0029		2.1	0.0124		6.5	0.03	
Access Road Construction (75cy)																					
Grader	200	4	3	1	-	2370	21	0.031	180	1.6	0.002	15	0.13	0.0002	135	1.2	0.002	205	1.8	0.003	6
Dozer	153	4	3	1	-	1660	15	0.022	110	1.0	0.002	15	0.13	0.0002	105	0.9	0.001	110	1.0	0.002	6
Gravel Truck	10 yd3	4	2	-	30	11.3	6.0	0.0060	2.2	1.2	0.0012	0.6	0.3	0.0003	0.3	0.2	0.0002	14	7.4	0.0074	7
Compactor	-	4	2	1	-	1787	16	0.016	71	0.6	0.001	67	0.6	0.001	235	2.1	0.002	128	1.1	0.001	8
Equipment Delivery Truck	Low boy	1	2	-	30	11.3	1.5	0.002	2.2	0.3	0.000	0.6	0.08	0.0001	0.3	0.0	0.000	14	1.9	0.002	7
Worker Light Truck	Light	-	8	2	25	1.0	0.2	0.001	0.35	0.08	0.000	0	0	0	0.06	0.0	0.000	7.2	1.6	0.006	7
Maxima and Subtotals (Access Road Construction)							29	0.08		3.1	0.01		1.0	0.0014		2.3	0.006		12.7	0.02	
Shelter Placement																					
Crane	150 ton	8	1	1	-	576	10	0.005	82	1.4	0.0007	64	1.1	0.0006	41	0.7	0.000	1624	29	0.014	8
Equipment Delivery Truck	Low boy	10	1	-	150	11.3	74	0.037	2.2	15	0.0073	0.59	3.9	0.002	0.31	2.1	0.001	14	93	0.046	7
Worker Light Truck	Light	2	2	-	30	1.0	0.3	0.0003	0.35	0.1	0.00009	0	0	0	0.06	0.0	0.000	7.2	1.9	0.002	7
Maxima and Subtotals (Shelter Placement)							85	0.043		16	0.0081		5.0	0.003		2.8	0.00		123	0.06	
General Construction Activities																					
Compactor	<25 hp	6	12	1	-	8	0.11	0.00065	227	3.0	0.0180	1.4	0.02	0.0001	0	0	0	6350	84	0.504	8
Equipment Delivery Truck	Low boy	1	2	-	30	11.3	1.5	0.001	2.2	0.3	0.0003	0.59	0.1	0.0001	0.31	0.04	0.00004	14	1.9	0.002	7
Construction Generator	<50 hp	8	12	1	-	0.02	0.0003	0.000002	0.002	0.00004	0.0000002	0.001	0.00002	0.0000001	0.002	0.00004	0.0000002	0.01	0.0002	0.000001	8
Water Truck	4500 gal.	1	3	-	30	11.3	1.5	0.002	2.2	0.29	0.0004	0.59	0.08	0.0001	0.31	0.04	0.00006	14.0	1.9	0.003	6
Worker Light Truck	Light	1	33	-	30	1.0	0.13	0.002	0.35	0.0	0.0008	0	0	0	0.06	0.008	0.0001	7.2	1.0	0.016	7
Maxima and Subtotals (General Construction)							3.2	0.007		3.6	0.0195		0.2	0.0003		0.16	0.0002		89	0.52	
Maxima and Subtotals, Construction Engine Emissions (3)							85	0.40		16	0.061		5	0.01		3	0.03		123	0.52	0.00
Total Construction Emissions (Fugitive plus exhaust)								0.40			0.061		25	0.44			0.03			0.52	
Construction Thresholds								--			--		82 lb/day				--			--	
Insignifigant Impact (9)								Yes			Yes		Yes				Yes			Yes	

Construction Fugitive Dust Emissions

SOURCE	DAILY AMOUNT (hours)	DAYS OF ACTIVITY	AREA OF GRADING / TRENCHING	PM_{10} EMISSIONS EF	PM_{10} EMISSIONS (daily lbs)	PM_{10} EMISSIONS (total tons)	NOTES
Site Grading	8	13	0.27 acres	39.4 lb/acre-day	11	0.068	12
Access Road Construction and Use	8	34	0.46 acres	39.4 lb/acre-day	18	0.308	13
Trenching - Cable Installation	8	12	-	0.51 lb/hr	4.1	0.024	
Wind Erosion	24	29	0.29 acres	6.6 lb/acre-day	1.9	0.028	11
Subtotal, Construction Fugitive Emissions (3)					20	0.43	15
Total PM10 Construction Emissions (Engine Exhaust and Fugitive) (3)						0.44	

(Continued)

Operation Emissions (4)

SOURCE	SIZE / GROSS HP	DAILY AMOUNT (hours)	DAYS OF ACTIVITY	NUMBER OF UNITS	ONE-WAY DISTANCE (miles)	NO_x EF (g/hr) (2)	NO_x Daily (lbs/day)	NO_x Annual (tons/year)	ROG EF (g/hr) (2)	ROG Daily (lbs/day)	ROG Annual (tons/year)	PM_{10} EF (g/hr) (2)	PM_{10} Daily (lbs/day)	PM_{10} Annual (tons/year)	SO_x EF (g/hr) (2)	SO_x Daily (lbs/day)	SO_x Annual (tons/year)	CO EF (g/hr) (2)	CO Daily (lbs/day)	CO Annual (tons/year)	NOTES
Emergency Generator	337 (300 KW)	0.5	60	1		2,325	2.6	0.08	337	0.37	0.011	135	0.15	0.004	313	0.35	0.010	2,865	3.2	0.09	6,14
Worker Light Truck	Light	-	60	1	30	1.0	0.13	0.004	0.35	0.05	0.001	0	0	0	0.06	0.01	0.0002	7.2	0.96	0.03	7
Total Operation Emissions (5)							2.70	0.08		0.42	0.013		0.15	0.004		0.35	0.011		4.1	0.12	
Operation Thresholds							Exempt			Exempt			Exempt			Exempt			Exempt		
Insignifigant Impact (10)							Yes			Yes			Yes			Yes			Yes		

'-' = Not applicable

Unit abbreviations: g/hr = grams per hour, lb/day = pounds per day, tpy = tons per year, tpq = tons per quarter

(1) Daily amount is measured in hours for off-road construction equipment (e.g., grader), and in number of trips for on-road vehicles (e.g., worker light-truck).

(2) Emission factors are in grams per hour for off-road equipment, and in grams per mile for on-road vehicles.

(3) Construction engine emission subtotals are for the complete project. Major pieces of construction off-road equipment (e.g., grader, dozer) are used consecutively, not concurrently.

(4) Operation and construction will not occur simultaneously, and hence, the emissions are not additive.

(5) Operational emission totals are for the project. Only one generator will be tested on a single day.

(6) Emission factors are from Caterpillar Corp.

(7) EMFAC7G Emission Factors (1998, 15mph, 75^{o}F)

(8) SCAQMD CEQA Handbook, Table A9-8-B

(9) Construction emissions have insignifigant impact when no emission of a major piece of off-road equipment exceeds threshold (i.e., major pieces are used consequently, not concurrently).

(10) Operation emissions have an insignificant impact if emergency generators are exempt from regulatory limits or if no regulations apply.

(11) Number of days subject to wind erosion equal to days for trenching.

(12) Area to be graded is sum of 115-foot by 66-foot fenced compound and 10-foot wide perimeter band.

(13) Access road assumed to be 1000 ft long and 10 ft wide.

(14) The 25-minute test cycle will be conducted mostly at 50 percent load. To be conservative, the horsepower is stated and emissions are calculated at 75 percent load.

(15) Daily construction fugitive emissions includes the specific activity plus wind erosion.

Generator testing and the visiting technician vehicle would contribute operational air emissions as shown in Table 9-III-1. The generator would be constructed and operated in a manner consistent with existing air quality plans by fully complying with the requirements of Rule 200, and particularly meeting the BACT requirements of Rule 207 for NO_x emissions. Operation of the emergency standby generator would be in compliance with the offset because it would be operated less than 60 hours per year, would not be used in conjunction with any utility voluntary demand reduction program, and would be fully documented with regard to duration of use.

Normal operations at the site would generate approximately one vehicle trip to and from the site each week.

Level 3 has already committed to taking the following actions:

- Obtain an authority to construct and permit to operate the emergency standby generator under MBUAPCD Rule 200.

- Construct and operate the generator under BACT in accordance with Rule 200 to minimize NO_x emissions. Based on MBUAPCD guidance, BACT for NO_x emissions will include either a turbocharger with intercooler/aftercooler and fuel injection timing retarded at least 4 degrees below the standard factory setting or a maximum certified NO_x emission rate of 7.2 grams per horsepower-hour. BACT for VOC emissions will include positive crankcase ventilation and use of fuel satisfying reformulated diesel specification established by the Air Resources Board.

- Document that the generator will not and does not operate more than 60 hours per year and will not be used in conjunction with any utility voluntary-demand-reduction program.

Level 3 has already committed to implement the following dust control measures during construction:

- Water all active construction areas at least twice daily;
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two fee of freeboard;
- Pave access roads, parking areas, and staging areas at construction sites, or apply to all unpaved access roads, parking areas, and staging areas water three times daily or (non-toxic) soil stabilizers; and
- Sweep daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

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
		☐	☐	☒	☐

b) Less than Significant Impact. As discussed above the project site lies in an area designated as nonattainment for the state ambient air quality standards for ozone and PM10.

MBUAPCD has developed CEQA Air Quality Guidelines that provides guidance to lead agencies in determining whether a project would be likely to result in an exceedence of an air quality standard or contribute substantially to an existing or projected exceedence. For evaluating construction-phase air quality impacts, MBUAPCD recommends using an emissions-based significance criterion (threshold) of 82 pounds per day of PM10. For evaluation of operational-phase impacts, MBUAPCD recommends use of the following thresholds expressed on a daily basis: 550 pounds per day for CO; 150 pounds per day for VOC, NO_x, and SO_x; and 82 pounds per day of PM10.

As shown in Table 9-III-1, the daily PM10 emissions are the only construction-related emissions of concern since MBUAPCD only has a PM10 emission threshold. Maximum daily emissions of PM10 would be less than regulatory thresholds and, therefore, are less than significant.

MBUAPCD requires dust control measures to be implemented during construction. As discussed under III(a) above, Level 3 would implement a comprehensive series of dust control measures to manage fugitive dust during construction .

Because the emergency standby generator would operate for less than 30 hours annually, it is exempt from compliance with numerical thresholds associated with offset requirements**.** Additional VOC emissions from the aboveground diesel storage tank would be negligible because of its integral construction, infrequent filling, and strict adherence to procedures to avoid spillage during tank filling.

During an actual power outage, the proposed standby engine may operate for periods longer than one hour with proportionately greater daily emissions. However, the MBUAPCD-recommended operational-phase significance thresholds are not intended to be used for evaluating temporary or infrequent activities such as the use of a standby generator during an actual emergency.

Additional operation emissions associated with weekly site visits of one vehicle would be minor.

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 ☐

c) Less than Significant Impact. The San Ardo ILA site is the only Level (3) site under the juridiction of MBUAPCD.

Simultaneous construction at two sites will not exceed the annual or daily numerical thresholds, and therefore, the potential cumulative impacts of the two sites on air quality in the North Central Coast Air Basin will not be significant.

As a general matter, emissions from the use of emergency equipment have already been accounted for in the 1997 AQMP emission inventory. Since the principal source of emissions from the project would be from such equipment, the project would be consistent with the assumptions used for the 1997 AQMP, and hence, would not have a significant cumulative impact on air quality.

Cumulative emissions from testing and maintaining the emergency generators at the site in the Monterey Bay area are exempt from offset requirements because these emissions from each generator are exempt. Emissions that are exempt from regulatory requirements are considered to have impacts that are less than significant.

The project's incremental contribution to the cumulative effect of additional emissions sources on the regional ozone and PM10 concentrations would not be cumulatively considerable because ozone impacts are the result of the cumulative emissions from numerous sources in the region and transport from outside the region. All but the largest individual sources emit VOCs 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 ☐

d) Less than Significant 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 nearest neighbors to the proposed ILA site are a number residential uses adjacent to the site with outdoor use areas that qualify as sensitive receptors. The distance of the closest sensitive receptor to the (closest edge of the) site is approximately 40 feet.

Project construction would affect an area of less than one acre within the larger 2.9-acre site. Therefore, receptors associated with surrounding uses would be buffered from the effects of project construction. This buffer, along with the low levels of construction emissions, would prevent substantial pollutant concentrations from reaching sensitive receptors. The application of fugitive dust control measures would keep potential impacts below a level of significance.

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 ☒

e) No Impact. The proposed project would not create objectionable odors that would affect a substantial amount of people.

IV. BIOLOGICAL RESOURCES

Setting

The site is flat, with compacted soil that is nearly devoid of vegetation. There are small patches of ruderal vegetation scattered on the site. The site contains no trees, drainages, wetlands, or mammal burrows. The site lies adjacent to the railroad and is surrounded on the three other sides by paved roads.

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) No Impact. There are no records of the presence of special status species at or near the project site (San Ardo Quadrangle, California Department of Fish and Game, March 2000). There is no evidence to suggest that this site provides significant habitat for any sensitive species.

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 ☒

b) No Impact. There are no riparian resources or other sensitive natural communities present on the site (CDFG, March 2000).

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 ☒

c) No Impact. The site is located on relatively flat, disturbed land and does not support wetland hydrology. The project would not discharge materials into any jurisdictional waterway.

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 ☒

d) No Impact. There are no native habitats present on the site, so the project would not interfere with the movement of any native resident or migratory fish or wildlife species.

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

e) No ImpactThere are no applicable policies or ordinances protecting biological resources on the site (PEA, 2000, p. 9-12).

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 ☒

f) No Impact. There are no Habitat Conservation Plans or Natural Community Conservation Plans applicable to the site (PEA, 2000, p. 9-13).

V. CULTURAL RESOURCES

Setting

The project site is located in the community of San Ardo on level terrain in the Salinas River Valley near Pancho Rico Creek, Monterey County. Ethnographically, the project area was inhabited by the Salinan-speaking peoples. The San Ardo ILA facility is located along the Salinas River a few miles north of the reported location of the Salinas village of Tsho-hwal.

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 ☒

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 ☒

a) and b) No Impact. An archival record search was completed for the site and area within a one-half mile radius by the California Historical Resources Information System (CHRIS), Northwest Information Center, Sonoma State University. The search also included a check of the California Office of Historic Preservation Historic Property Data File for Monterey County, GLO Plats, the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, California Register of Historical Resources, and California Historical Landmarks. The records search reported that the property had not been previously surveyed (File No. 99-669). The record search also indicated that there are no recorded archaeological sites within a one half-mile radius. No other properties within a half-mile are listed on the National Register of Historic Places, the California Register of Historical Resources, California State Historic Resources Inventory, California Historical Landmarks, and California Points of Historical Interest.

The State of California Native American Heritage Commission (NAHC) completed a search of the NAHC Sacred Lands file with negative results and identified locally knowledgeable Native Americans for follow-on contact/consultation. These individuals were contacted and a response from the North Valley Yokut/Ohlene/Oostanean/Mo-Wuk Tribe was received by Level 3 on December, 21, 1999. The tribe recommended that this site be monitored during construction by Native Americans.

The field survey noted the presence of both surface prehistoric and historic cultural materials in the northern portion of the parcel. Potential prehistoric items included marine shell (2 *Tivela* spp. fragments), a freshwater mussel shell fragment, and seven chert fragments (Monterey: brown/tan and pink, and Franciscan: red, green, and pink). The chert fragments did not appear to be worked. Historic artifacts included ceramic fragments (Franciscan ware), two fragments of aquamarine glass with an iridescent patina, and one fragment of amber glass with an iridescent patina.

An archaeological test program consisting of 10 shovel test probes was undertaken to determine whether subsurface cultural material was present. No cultural material was found in any of the STPs. It appears that the material observed on the surface was imported to the area as a part of the gravel used to build the road along the western side of the parcel. The test program results determined that the proposed construction would have no impact on archaeological resources eligible for the California Register of Historical Resources.

The parcel also contains the remains of the Holly Sugar Company (established in the early 1900s) receiving facility, including intact loading and handling structures, probably for transferring sugar beets into waiting railcars from the adjacent tracks. The facilities include a truck scale and scale house, overhead conveyor/loader, and subterranean conveyor facility. A large diesel engine is present which powered an adjacent horizontal piston pump/compressor by means of belts and pulleys. The receiving facilities are located adjacent to the railroad tracks, while the rest of the parcel is vacant. A qualified

architectural historian investigated the sugar beet facilities. The structures on the project parcel do not appear eligible for the California Register of Historical Resources as they are not associated with significant historic events or important persons, do not have distinctive architectural characteristics, nor do they have the potential to yield information important in history. In addition, the structures are less than 50 years old.

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 ☐

c) Less than Significant Impact. The project site is underlain by Quaternary alluvium (Qal). Two late Pleistocene fossil sites are recorded in areas underlain by alluvium in the Salinas Valley in Monterey County. These fossil occurrences suggest there is a potential for late Pleistocene and early Holocene continental terrestrial animals and plant fossil remains occurring in the subsurface of the facility site. However, it is unlikely that construction-related earth-moving activities at the project site would extend to a depth sufficient to encounter remains old enough to be considered fossilized (PEA, 2000, p. 9-16).

Level 3 has already committed to paleontological monitoring when earth-moving activities extend below 4 feet below current grade. Paleontological monitoring will be conducted by a qualified vertebrate paleontologist to allow for recovery of larger fossil remains and rock samples would 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 would be in compliance with the Society of Vertebrate Paleontology Guidelines for the management of paleontologic resources and for the museum's acceptance of a monitoring program for 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 ☒

d) No Impact. The CHRIS records search and field survey provided no evidence of the presence of human remains (File No. 99-669). 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 (see *Level 3 Long-Haul Fiber Optics Project Cultural Resources Procedures* (PBNS, 1999:25-39)).

VI. GEOLOGY AND SOILS

Setting

The project site is located in the Salinas River Valley within the Coast Ranges. This area is seismically active with the San Andreas fault to the east and the Rinconada fault to the west. The site is not within an Alquist-Priolo zone, or a landslide, liquefaction, or erosion hazard area (CDMG, 1973, 1999). Soils in the project area are designated as moderately expansive (CDMG, 1973).

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 ☐

a) Less than Significant Impact. The project site is not located within or near an Alquist-Priolo zone, a landslide, erosion, or liquefaction hazard area (CDMG, 1973, 1999). The site is not within a landslide or liquefaction erosion hazard area (CDMG, 1973, 1999). Moderate to severe groundshaking at the project site could result from a significant earthquake on either the San Andreas or Rinconada faults located 14 and 8 miles from the site, respectively (Blake, 1998; CDMG, 1996). The project site is in a county-designated zone of severe groundshaking, so damage to the structure or equipment could occur during an earthquake (PEA, 2000, p. 9-18). The site would not be occupied on a full time basis, and therefore would not expose people to substantial risk of injury or death from the seismic hazards.

Monterey County policies related to this seismic hazard require that the applicant submit a preliminary seismic and geologic hazard report, to be performed by a registered geologist, with all other permits. Additionally, building design should meet Uniform Building Code-Zone 4 Seismic Standards and any and all local building and seismic codes to minimize any adverse seismic hazard and risk to facility structures.

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 ☒

b) No Impact. The project area is relatively flat and is located in an area designated as having low erosion activity (CDMG, 1973).

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 ☒

c) No Impact. The project site is relatively flat and is not located in an area with unstable soil or geologic units.

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 ☒

d) No Impact. The soil in the project area is mapped moderately expansive. The proponent's commitment to compliance with local and state building codes will minimize potential hazards and risks from expansive soil.

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 ☒

e) No Impact. The facility would not be occupied and thus would not require sewer or other means of wastewater disposal.

VII. HAZARDS AND HAZARDOUS MATERIALS

Setting

Review of a database of regulatory agency recognized hazardous waste sites revealed no potentially contaminated sites at or adjacent to the project site (Vista, 1999). A site visit conducted for the Level 3 PEA identified two potential sources of contamination within and adjacent to the site (PEA, 2000). An unused diesel tank and associated water pump equipment were noted onsite. Storage drums and aboveground storage tanks were observed at a truck facility just to the south of the site (PEA, 2000, p. 9-19). San Ardo Union School is located within one-quarter mile of the site. The project site is not located in the vicinity of a public airport or within an airport land use plan. It is located less than one-quarter mile south of a private airstrip. Fuel for the standby generator would be stored in an aboveground storage tank on site.

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 ☒

a) No Impact. Level 3 will handle and store hazardous materials onsite in compliance with applicable federal, state, and local regulations to minimize any potential impact.

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 ☒

b) No Impact. Leak monitoring and spill containment features planned for the onsite aboveground fuel storage tank minimize the risk of hazardous substance release through foreseeable upset or accident conditions.

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 ☒

c) No Impact. San Ardo Union School is located approximately one-quarter mile south of the project site. It is not anticipated that children from this facility will walk by the site with any frequency. Proper handling and storage of hazardous materials, and restricted access to hazardous materials will reduce the risk of exposure.

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 ☐

d) Less than Significant Impact. The project site is not included on a list of regulatory agency recognized hazardous materials sites (Vista, 1999). A site visit conducted for the Level 3 PEA identified two potential sources of contamination within and adjacent to the site (PEA, 2000). An unused diesel tank and associated water pump equipment were noted onsite, and storage drums and aboveground storage tanks were observed at a truck facility approximately 40 feet south of the project site (PEA, 2000). Localized pockets of contamination may be encountered near these sites.

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 ☒

e) No Impact. The project site is not within an airport land use plan or within two miles of public 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 ☒

f) No Impact. San Ardo Field, a private airstrip is located less than one-quarter mile north of the project site. Because the ILA facility will be unmanned except for brief maintenance visits, the airstrip would not pose a significant risk to anyone working at the ILA facility.

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 ☒

g) No Impact. Redevelopment of this site for use as an ILA facility would not alter, impair, or interfere with adopted emergency response and evacuation plans.

h)	Would the project 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 ☒

h) No Impact. The site is located in an urban/commercial area, and would not be subject to wildland fires.

Level 3 has already committed to equip generators with spark arrestors to minimize potential impacts.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The facility is to be constructed within a vacant, disturbed lot. The site is not located within a 100-year floodplain (PEA, 2000, Figure 9-9).

Level 3 has already committed to taking the following actions to ensure that hydrology/water quality impacts are minimized during construction and operation of this site. The actions will be applied as appropriate. Details regarding these actions have been provided (PEA, 2000, Appendix E, Volume 3).

- Bore under sensitive habitats when practicable
- Implement erosion control measures during construction
- Remove cover vegetation as close to the time of construction as practicable
- Confine construction equipment and associated activities to the construction corridor
- No refueling of construction equipment will take place within 100 feet of an aquatic environment
- Comply with 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
- Complete post-construction vegetation monitoring and supplemental revegetation where needed.

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

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 ☒

a) No Impact. Proposed construction, operation, and waste disposal activities are to be performed 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 ☐

b) Less than Significant Impact. The project will not involve groundwater extraction. Net impermeable area will be slightly increased on the site, but, due to the relatively small size of the project, the effect on groundwater recharge would be only minimally impacted.

To aid in groundwater infiltration, Level 3 has committed to placing gravel on the compound surrounding the building pads. The gravel compound will consist of ¾ inch rock to a thickness of approximately four inches.

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 that 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 ☐

c) Less than Significant Impact. The proposed activity will slightly alter the drainage pattern of the existing site, but will not alter the course of a stream or a river. Minimal site grading is anticipated. Due to the relatively small size of the project, substantial change to the erosion or siltation characteristics on or off site would not be expected with the project.

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 that would result in flooding on or off site?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

d) Less than Significant Impact. The proposed activity will slightly alter the drainage pattern of the existing site, but will not alter the course of a stream or a river. Minimal site grading is anticipated and the only change in impervious surfaces will be the concrete poured for the ILA huts and the emergency generator. Due to the relatively small size of the project, substantial change to the runoff characteristics on or off site would not be expected with the project.

e)	Would the project create or contribute runoff water that 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 ☐

e) Less than Significant Impact. Minimal site grading is anticipated and the only change in impervious surfaces will be the concrete poured for the ILA huts and the emergency generator. Due to the relatively small size of the project, substantial change to the runoff characteristics on or off site would not be expected with the project.

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

f) Less than Significant Impact. Proposed construction practices are expected to minimize impacts to water quality to the less than significant level.

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 ☒

g) No Impact. The project does not include housing.

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

h) No Impact. The project is not located within a 100-year floodplain (PEA, 2000, Figure 9-9).

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 ☒

i) No Impact The site is not located within an area subject to inundation from dam or levee failure (PEA, 2000, page 9-21).

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 ☒

j) No Impact. The site is not located within an area subject to inundation by seiche, tsunami, or mudflow (PEA,2000, page 9-21).

IX. LAND USE PLANNING

The proposed site is located on an undeveloped 2.85-acre parcel at the northeast intersection of Cattlemen Road and Short Street in the town of San Ardo. The site is bordered on the west by Cattlemen Road, on the north by vacant land, on the east by the Union Pacific Railroad right of way with agricultural land beyond, and on the south Short Street. Commercial development is located across Short Street to the south while multifamily residential properties are located across Cattlemen Road to the west. The general vicinity consists of the mixed uses comprising the San Ardo town center, with agricultural lands extending beyond. See Figure 9-1 in this Initial Study and PEA Figures 9-1 through 8 for detailed locator and site vicinity maps.

The South County Area Plan land use designation for the project site is "Industria
designation is "Heavy Industrial." The project could be permitted as a "public utility structure" within

the Heavy Industrial zoning designation contingent upon submittal and review of a General Development Plan and approval of a Use Permit. Therefore, the proposed project is not anticipated to conflict with any adjacent uses and is considered consistent with the General Plan and Zoning Ordinance. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant land use impacts are anticipated. See Figure 9-1 in this Initial Study and Figures 9-5, 7, and 8 of the PEA for locations of adjacent uses.

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 ☒

a) No Impact. Although there are several residences on the west side of Cattlemen Road, the project site is located on the east side of Cattlemen Road on the eastern edge of San Ardo adjacent to the Union Pacific Railroad right of way and agricultural fields. Therefore, the proposed project would not divide an existing 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 ☒

b) No Impact. The proposed use could be permitted as a "public utility structure" within the Heavy Industrial zoning designation contingent upon submittal and review of a General Development Plan and approval of a Use Permit. Therefore, the proposed project is not anticipated to conflict with any adjacent uses and is considered consistent with the General Plan and Zoning Ordinance.

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 ☒

c) No Impact. There are no habitat conservation plans or natural community conservation plans that pertain to the site.

X. MINERAL RESOURCES

Setting

The project area is not located in an area designated by the state or the city of Monterey County for mineral resources (PEA, 2000, p. 9-25).

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 ☒

a) No Impact. There are no known mineral resources within the project area.

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 ☒

B. No Impact. There are no known mineral resources within the project area.

XI. NOISE

Setting

A number of residences are located approximately 40 feet from the site boundary. A public receptor (trucking facility) is located approximately 40 feet to the south. The site is located approximately one-quarter mile from a private landing strip for airplanes. The site is not within the vicinity of a public airport, nor is it within an airport land use plan.

Monterey County has a construction noise impact threshold that triggers at 85 dBA, 50 feet from the source. In addition, the Monterey County General Plan states that the external CNEL noise level for office buildings, business and commercial and professional areas should be in the range of 50 to 67 dBA.

Evaluation

a)	Would the project result in exposure of persons to or generation of noise levels in ex cess 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 ☐

a) Less than Significant with Mitigation Incorporation. The estimated maximum construction noise level is 84 dBA at 50 feet from the source, which is below the local standard for construction (85 dBA measured 50 feet from the source). Because the facility would use prefabricated structures, the construction period would be brief. The estimated maximum noise level at the nearest a residence is 86 dBA. This assumes that construction occurs at the site boundary adjacent to the residence. Since less than an acre of the 2.9-acre site would be developed and the developed area would be surrounded by buffer zones on all sides, the actual noise level at the receptor would be less. Therefore, potential impacts associated with construction are less than significant.

With regard to operations, the potential maximum noise level at nearby residences (40 feet from the proposed project location) was calculated to be 66 dBA CNEL, which is within the upper range of permissible CNEL (50 dBA to 67 dBA). The 66 dBA CNEL calculation is based on a 20 foot setback from the property boundary in addition to the 40 foot distance to the receptor (total distance is 60 feet).

To minimize operational impacts Level 3 has committed to compliance with the local construction operation noise ordinance by installing the generator shelter at a 20-foot setback from the property boundary.

In addition to the above, it is additionally recommended that Level 3 shall house the emergency generator in a specially designed enclosure that reduces noise levels to at least 75 dBA at 5 feet (Mitigation Measure 9-XI-1).

Implementation of the above mitigation measures would comply with the Monterey County General Plan, thus reducing potential impacts to a level that is less than significant.

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 ☐

b) Less than Significant Impact. Project construction would not generate excessive groundborne noise or vibration. The low level of groundborne vibration and noise generated during construction will be short term in nature, and generally will not extend more than a few feet from the active work area. Since the nearest residential receptor is approximately 40 feet from the site boundary, there would be a less than significant impact from groundborne vibrations associated with project construction.

With regard to operations, the 300 kW generator would be the only potential source of excessive groundborne noise or vibration from the site operations. The generator will be mounted on rubber isolators that effectively reduce groundborne vibration by up to 95 percent. Potential impacts associated with groundborne noise and vibration are less than significant. The 60-foot minimum distance to the nearest residences provides additional assurance that no excessive groundborne noise or vibration would *be detected.*

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 ☒

c) No Impact. There would be no permanent noise sources at the facility. Therefore, there would be no impacts.

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 ☐

d) Less than Significant Impact. Temporary increases in ambient noise levels would occur during the approximately two months of construction but these levels would not be significant and would comply with the local construction noise ordinance.

With regard to periodic ambient noise level increases, the emergency generator would operate during weekly test for periods of approximately 30 minutes and during power outages, and some minor maintenance activities would generate periodic noise. This periodic noise would not be a substantial increase in ambient noise levels because the distance from the boundary with the nearest industrial

facility would create a buffer area around the generator and the generator would be housed in a specially designed enclosure that reduces noise levels to at least 75 dBA at 5 feet. Therefore, potential impacts associated with periodic increases in ambient noise levels are less than significant.

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 ☒

e) No Impact. The site is not located within an airport land use plan or within two miles of a public 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 ☐

f) Less than Significant. The site is located one-quarter mile from a private airstrip. However, construction activities would be short-term in duration, and the project site would be unmanned during operations, except for weekly visits for facility maintenance. Therefore, potential impacts related to exposing people working at the proposed site to excessive airport noise levels are less than significant.

XII. POPULATION AND HOUSING

Setting

The site is located within Monterey County, with a population of 386,200 as of January 1999 (PEA, 2000, p. 9-28). The nearest housing is located to the northwest of the site, and across Railroad Street to the west.

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 ☒

a) No impact. The proposed project would not create new housing, extend roads, or extend 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 ☒

b) No impact. The project site does not include any residential housing. Consequently, it would not displace any housing units or create the need for replacement housing elsewhere.

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 ☒

c) No impact. The project site does not include any residential units. It would not, therefore, displace any people or create the need for replacement housing.

XIII. PUBLIC SERVICES

Setting

The site is located within Monterey County. Fire protection is provided by the San Ardo Volunteer Fire Company, with additional service from the Monterey County Fire Department. Police protection is provided by the Monterey County Sheriff's Department. There are no nearby recreational or public park facilities. Other public or quasi-public facilities located within the vicinity of the site include the San Ardo Union School, located approximately one-quarter mile to the west, and the Monterey County Library located one-half mile west of the site. The UPRR ROW is located along the eastern boundary of the property (Figure 9-2).

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 ☒

a) No Impact. Construction and operation of the unmanned ILA facility would have no impact on local schools, parks or other public services. A 9-foot chain-link fence will surround the site. The site would not have a significant impact on police services. The facility would contain a 1,000-gallon, double-walled, aboveground diesel fuel storage tank. Tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote). Fire protection equipment would be installed per local codes.

XIV. RECREATION

Setting

There are no recreational facilities in the immediate vicinity of the project site. Furthermore, due to the un-staffed nature of the facility, the proposed project will not result in additional use of existing recreation facilities or require construction of additional recreational facilities. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant recreation impacts are anticipated with project implementation.

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 ☒

a) No Impact. The proposed project will not be permanently staffed. Therefore, the proposed project will not contribute additional use of any recreation 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 ☒

b) No Impact. The project would not include recreation facilities. Since the proposed project will not be permanently staffed, it will not require the construction of new recreation facilities, which might have an adverse effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Setting

The proposed site would be located adjacent to Cattlemen Road, a two-lane, north south street. Short Street is located adjacent to the south of the site, which is an east west unpaved road. There are no sidewalks on Cattlemen Road or Short Street. There are no bike lanes, bus stops, or other alternate transportation facilities located near the site. The site abuts on the UPRR ROW in which the running line would be placed. Therefore, no public streets would be encroached by the fiber optic cable.

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 ☐

a) Less than Significant Impact. During construction of the proposed project, approximately 7 workers would be commuting to the site for approximately three months. Occasionally, trucks would deliver equipment and materials to the site as well as haul construction debris from the site to recycling centers or landfills. During the operational phase of the project, one or two service persons would visit the site approximately once a week. The project would have a negligible increase in traffic. Therefore, potential impacts are less than significant.

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 ☒

b) No Impact. The limited project traffic would not result in a measurable increase in congestion.

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 ☒

c) 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 ☐

d) Less than Significant Impact. The proposed site would be accessed by Cattlemen Road (see Figure 9-2). Cattlemen Road does not have dangerous curves or intersections. The driveway would be located per Monterey County Building Department direction.

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

e) 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 ☒

f) No Impact. Parking spaces would be provided on-site to accommodate vehicles used in periodic maintenance visits.

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 ☒

g) No Impact. There are no alternative transportation facilities located in the proposed project vicinity. The project would not conflict with any adopted policies, plans, or programs supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

The San Ardo ILA would require electricity and telephone. Utility lines supporting these capabilities are located overhead along Cattlemen Road on the western edge of the site (Figure 9-2) on wooden poles and wooden crossarms. No sewer or water hookups would be needed, and there would be no wastewater discharge or water usage.

Waste would be generated at the San Ardo ILA site during site preparation activities. Since the precise site-specific location of the ILA facility in the available "development window" at the San Ardo ILA Site has not yet been determined (see Figure 9-2) it is not possible at this time to estimate the volume of waste generated by site clearing activities. However, the site is already highly disturbed and there is virtually no vegetation cover. Every attempt would be made to minimize waste generation in the detailed, site-specific facility-siting process. Removal of old machinery currently occupying the site is the responsibility of the current owner. Station construction would not proceed before the machinery is removed. Therefore, solid waste generation during construction should be minimal.

During construction of the ILA facility, waste would be generated during site grading activities associated with building, parking and access road development. There should be no appreciable generation of solid waste since the construction materials are pre-fabricated, the site would not be permanently staffed, and site visits would be infrequent (one per week) and of short duration (one to several hours).

Level 3 will utilize the Johnson Canyon Landfill for disposal of the small amount of solid waste generated during site clearing.

Stormwater drainage will be installed per Monterey County regulations. For commercial facilities of less than 5 acre size all that is required is the Construction Activities Stormwater General Permit (NPDES CAF00002 Order No. 92-08 SWQ).

Fire protection equipment will be installed per Monterey County Ordinance 3600, which adopts the 1998 California Fire Code Article 79.

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 ☒

a) No Impact. The proposed site would create minimal wastewater and would not exceed the wastewater requirements of the applicable Water Quality Control Board.

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 ☒

b) No Impact. The proposed facility would be unmanned and would create no wastewater. The site would not require the construction or expansion of a wastewater treatment facility since there will be no water hook-ups.

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 ☐

c) Less than Significant Impact. The proposed site construction would involve site grading activities with building, parking, and access road development. Storm water drainage facilities would be installed per Monterey County Regulations. A Construction Activities Stormwater General Permit (NPDES CAF0002 Order No. 92-08 SWQ) would also be required. The burden on storm water drainage facilities would be less than significant at the proposed site.

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 ☒

d) No Impact. The proposed project would not require water hook-ups or access to an available water supply.

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 ☒

e) No Impact. The proposed site would produce no wastewater. The facility would not place additional demand on the local wastewater treatment provider.

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 ☐

f) Less than Significant Impact. Solid waste generation would occur during site grading activities associated with building, parking, and access road development. Minimal solid waste would be generated during on-going facility operation since it would be an unmanned site. The project's solid waste disposal needs could be served by the Johnson Canyon Landfill, which is permitted by the State of California.

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 ☒

g) No Impact. The proposed project would not generate a significant amount of solid waste. Landfills where waste will be deposited would be in compliance with applicable solid waste laws. The proposed project would comply with applicable solid waste laws.

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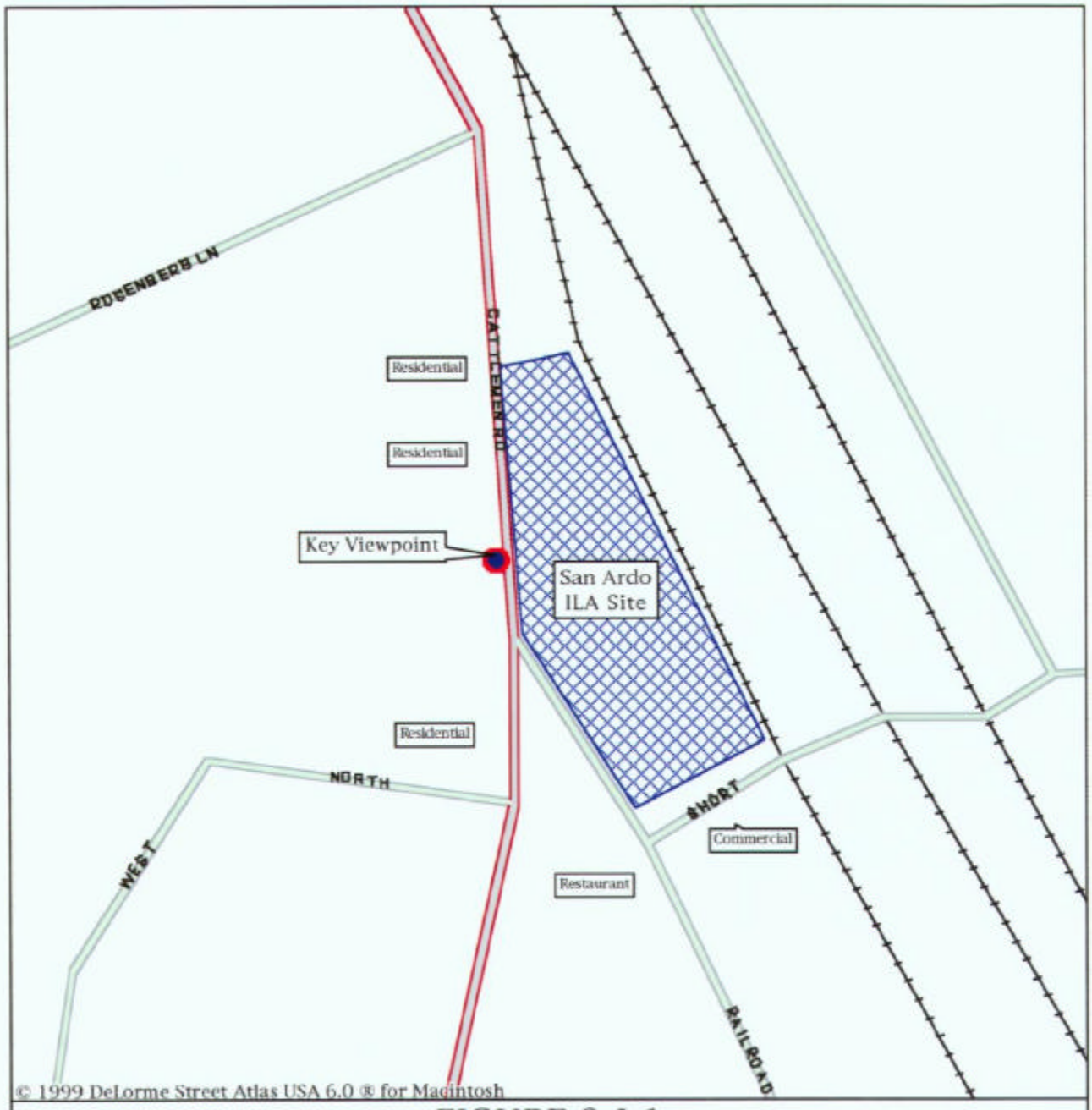

FIGURE 9-I-1

Mag 18.00
Fri Feb 25 15:54 2000
Scale 1:1,953 (at center)
200 Feet
50 Meters

Local Road
Major Connector
Railroad

Level 3 Communications Infrastructure Project	**Figure 9-1-2** **San Ardo ILA**	View to the east from the southbound shoulder of Cattlemen Road in front of an existing residence. The proposed facility would be located within the undeveloped parcel shown in the above photo.

VISUAL ANALYSIS DATA SHEET

KEY VIEWPOINT DESCRIPTION

LEVEL 3 SITE NO.
9
PROJECT COMPONENT
San Ardo ILA
VIEWPOINT LOCATION
Southbound Cattlemen Road, in front of an existing residence, viewing to the east toward the undeveloped parcel where the ILA site is proposed to be located.
ANALYST
Michael Clayton
DATE
2/8/00

VISUAL QUALITY

☐ Low
☒ Moderate
☐ High

Although adjacent railway and road infrastructure, and some abandoned facilities are visible in the foreground of views from this viewpoint, panoramic views provide an overall impression of a rural landscape consisting of foreground disturbed areas and naturally-appearing middleground to background features comprised of coherent forms, lines, and colors. While landscape character is considered common and generally lacking in vivid and/or unique visual features,overall visual quality is considered **low to moderate**.

VISUAL ABSORPTION CAPABILITY

Slope: LOW - Level terrain with no intervening landforms to screen project from view.

Vegetative Cover: LOW - The site is generally devoid of vegetation thus, providing no opportunities to screen project components from view.

Reclamation Potential: MODERATE - The site could support sufficient landscaping to partially screen the facility.

VIEWER SENSITIVITY

Views from the existing residences across from the site and those views available to motorists on Cattlemen Road are panoramic, encompassing not only the disturbed foreground project site, but the low rolling hills to the east as well. Viewer expectations would typically anticipate middleground to background rural landscapes that are generally naturally-appearing. Therefore, overall viewer sensitivity is rated **moderate**.

VIEWER EXPOSURE

Visibility: High

Distance Zones: [FG: 0-0.5mi.; MG: 0.5-4mi.; BG: 4mi.-horizon]
Foreground

Numbers of Viewers: Few to Moderate

Duration of View: Moderate to Extended

Overall Viewer Exposure:
Moderate to High - due to foreground proximity; open, level terrain lacking visual screening; and opportunity for moderate to extended view duration.

VISUAL IMPACT SUSCEPTIBILITY

☐ Low
☒ Moderate
☐ High

The low to moderate visual quality of the site combined with low to moderate visual absorption capabilty, moderate viewer sensitivity, and moderate to high viewer exposure lead to an overall rating of **moderate** for visual impact susceptibility.

(over)

Level 3 Site No. 9 Viewpoint
(continued)

VISUAL CONTRAST RATING

CHARACTERISTIC LANDSCAPE DESCRIPTION			
	LAND/WATER BODY	**VEGETATION**	**STRUCTURES**
FORM	Flat to mounded	Well-defined continuous blocks to irregular patchiness	Subordinate, geometric
LINE	Horizontal to Curvilinear	Indistinct	Vertical to horizontal
COLOR	Tan to indistinct	Green and tan	Grey, brown
TEXTURE	Smooth to granular	Smooth to coarse	Smooth

PROPOSED ACTIVITY DESCRIPTION			
	LAND/WATER BODY	**VEGETATION**	**STRUCTURES**
FORM	Same	Same	Prominent, geometric
LINE	Same	Same	Vertical, horizontal to diagonal
COLOR	Same	Same	Same
TEXTURE	Same	Same	Same

DEGREE OF CONTRAST

	LAND/WATER BODY				VEGETATION				STRUCTURES			
	NONE	LOW	MODERATE	HIGH	NONE	LOW	MODERATE	HIGH	NONE	LOW	MODERATE	HIGH
FORM	√				√						√	
LINE	√				√						√	
COLOR	√				√				√			
TEXTURE	√				√				√			

TERM: ☒ Long ☐ Short | **CONTRAST SUMMARY:** ☐ None ☐ Low ☒ Moderate ☐ High

PROJECT DOMINANCE

Subordinate ☐ **Co-Dominant** ☐ **Dominant** ☒

VIEW IMPAIRMENT

None ☐ **Low** ☐ **Moderate** ☒ **High** ☐

VISUAL IMPACT SIGNIFICANCE

Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
☐	☒	☐	☐