

PROPONENT’S ENVIRONMENTAL ASSESSMENT – ZAYO PRINEVILLE-TO-RENO FIBER OPTIC PROJECT

Wildfire

5.20 WILDFIRE

This section describes the existing wildfire conditions in the vicinity of the project and analyzes potential wildfire impacts associated with the construction, operation, and maintenance of the project. This section also describes environmental and regulatory settings.

5.20.1 Environmental Setting

5.20.1.1 High Fire Risk Areas and State Responsibility Areas

Table 5.20-1 and Figure 5.20-1 identifies the mapped linear miles of high fire risk or SRAs that fall within the running line of the project. Areas mapped as FRAs, SRAs, or LRAs are the responsibility of the federal, state, or local fire departments, respectively. These areas constitute land where the various entities (federal, state, or local district) are financially responsible for the prevention and suppression of wildfires. This table also indicates areas mapped by the CPUC as either moderate or high fire threat districts, as well as areas mapped by the CAL FIRE as FHSZs. The applicant has not independently mapped any areas as high FHSZ.

Table 5.20-1: Linear Miles of Wildfire Designations Intersecting with Running Line

Type	Lassen County	Modoc County	Sierra County	Total
Jurisdiction				
Local Responsibility Area	32.43	18.88	0	51.31
State Responsibility Area	64.98	32.36	3.10	100.44
Federal Responsibility Area	32.14	10.04	0	42.18
Grand Total	129.55	61.28	3.10	193.93
CPUC Fire Threat District				
CPUC Fire Threat District	55.60	6.54	3.06	65.2
CalFire Fire Severity Zones				
CalFire Very High FHSZ	0	0.16	0	0.16
CalFire High FHSZ	0	12.30	0	12.30
CalFire Moderate FHSZ	63.22	15.41	3.13	81.76
Grand Total	63.22	27.87	3.13	94.22

CPUC = California Public Utilities Commission

Source: CPUC 2020; CAL FIRE 2007, 2018, 2020

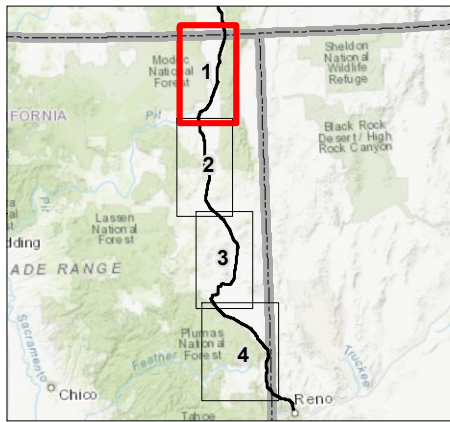
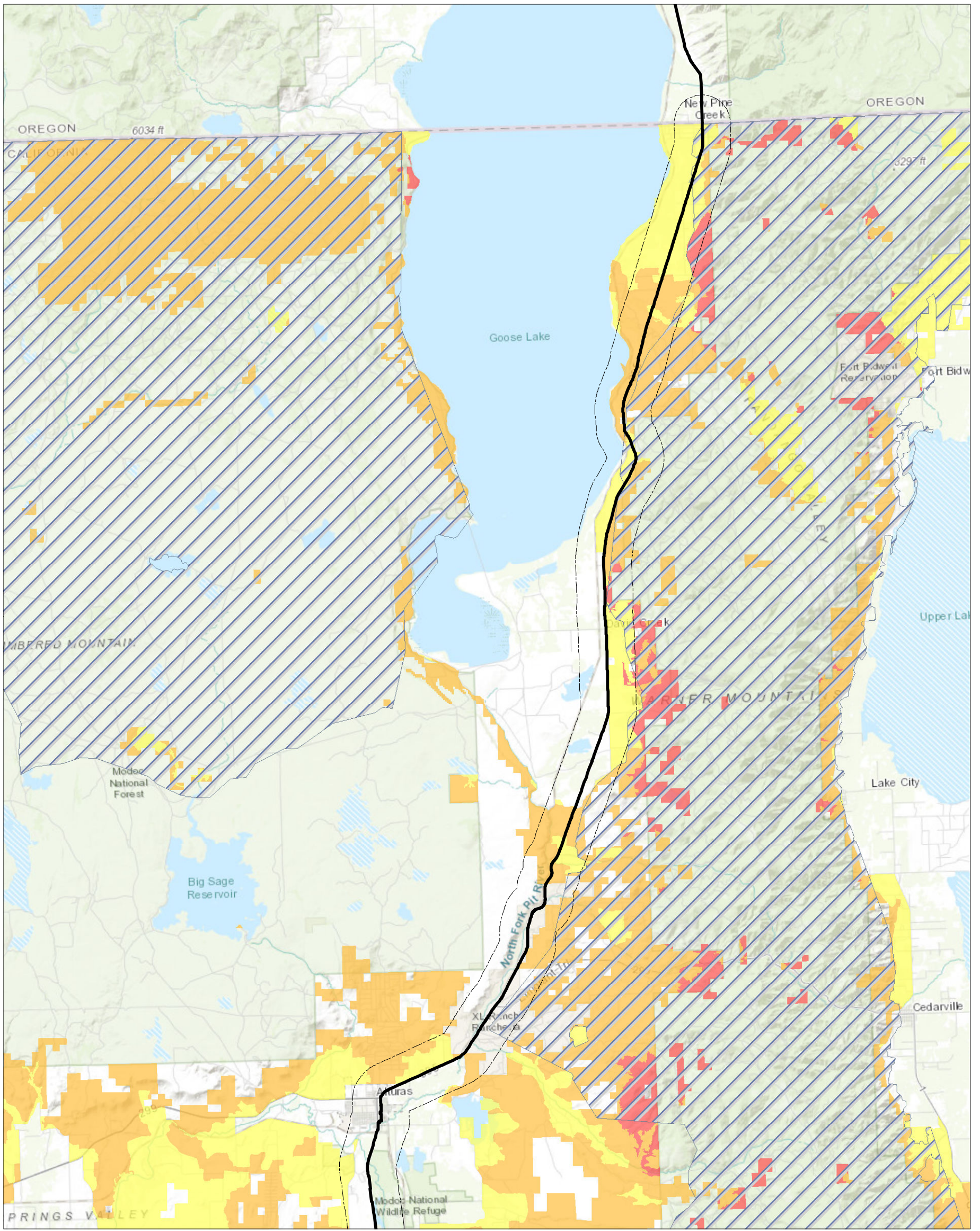


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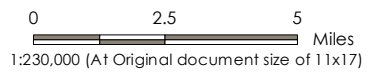




- CPUC Fire Threat
- Tier 2
- FIRE HAZARD SEVERITY ZONES in State Responsibility Area (SRA)
- Moderate
 - High
 - Very High
 - Alignment
 - 1-mile Buffer

Notes

1. Coordinate System: NAD 1983 UTM Zone 10N
2. Data source: Esri 2020; USGS 2020; BLM 2020
3. Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

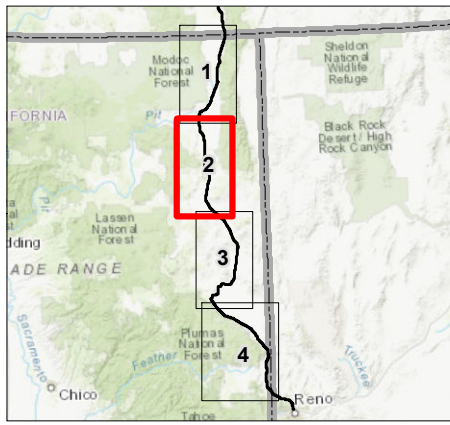
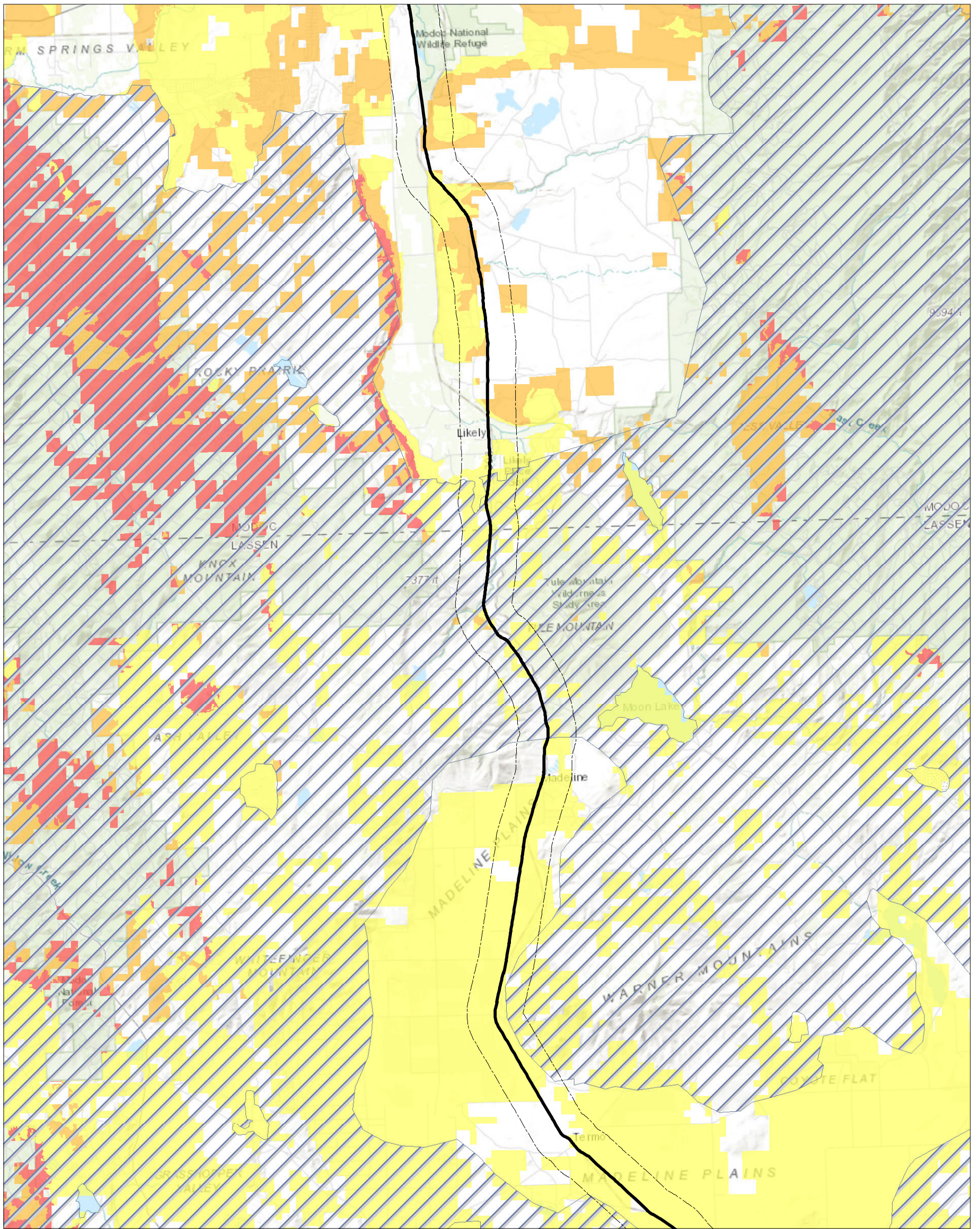


Project Location: 2272020011
 Prineville, OR to Reno, NV
 Prepared by JC on 2020-05-20
 Technical Review by PM on 2020-05-20
 Independent Review by CS on 2020-05-20

Client/Project
 Zayo
 Fiber Optic Line--Prineville to Reno

Figure No.
5.20-1

Title
Wildfire Hazards within One Mile of Proposed Prineville to Reno Fiber Optic Line



CPUC Fire Threat
 Tier 2
FIRE HAZARD SEVERITY ZONES in State Responsibility Area (SRA)
 Moderate
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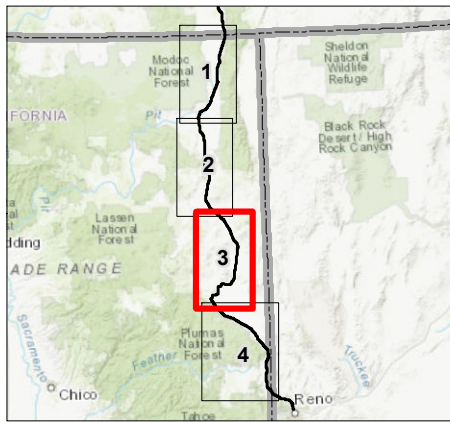
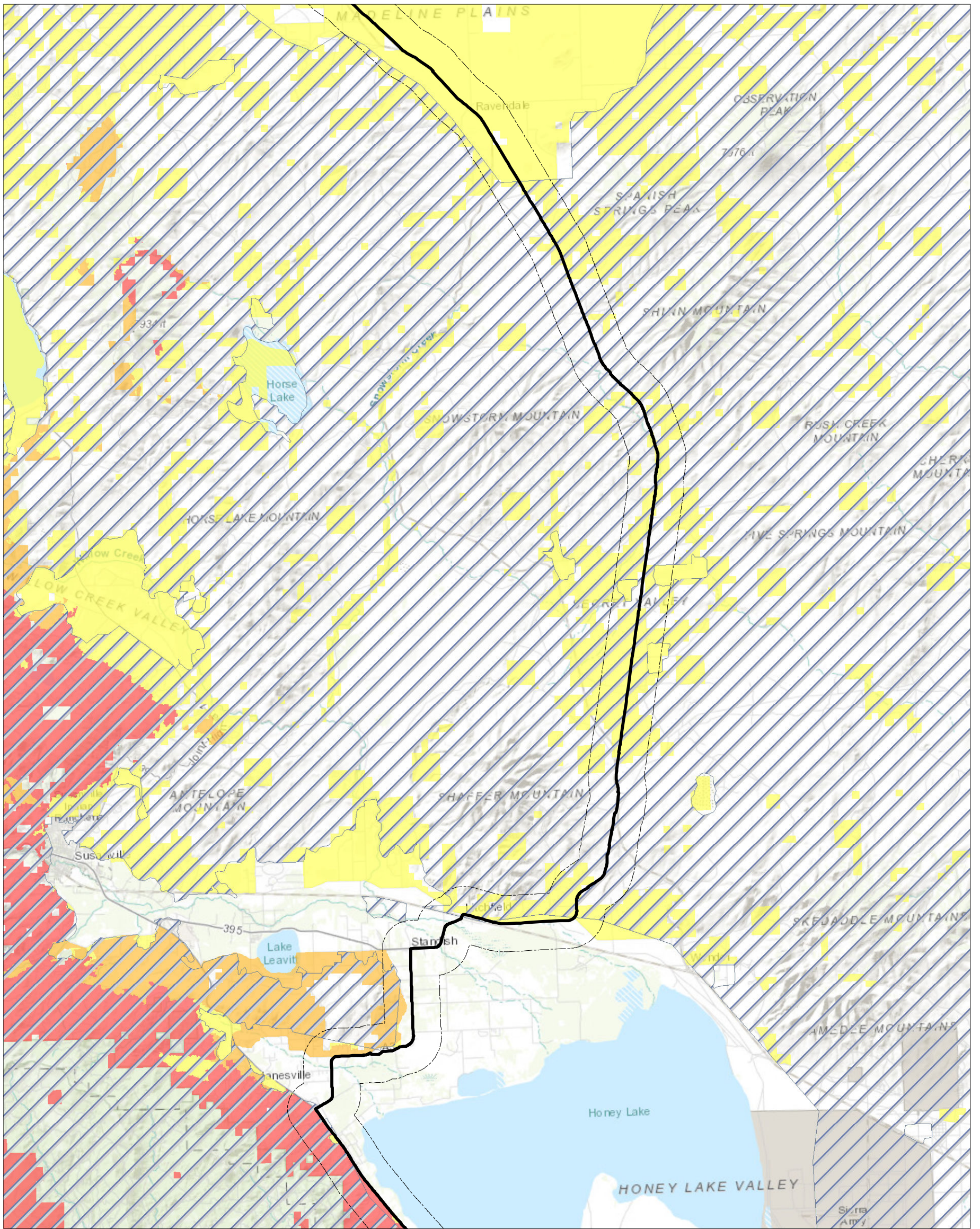
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0 2.5 5 Miles
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Figure No.: **5.20-1**
 Title:
Wildfire Hazards within One Mile of Proposed Prineville to Reno Fiber Optic Line



CPUC Fire Threat
 Tier 2
 FIRE HAZARD SEVERITY ZONES in State Responsibility Area (SRA)
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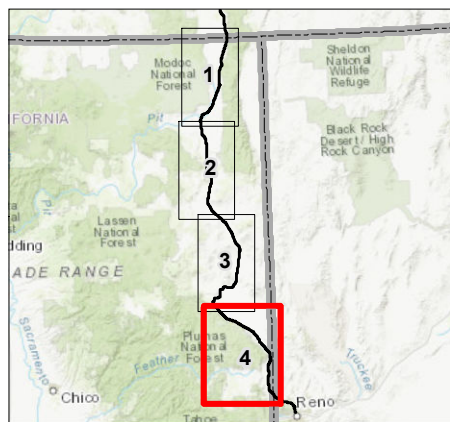
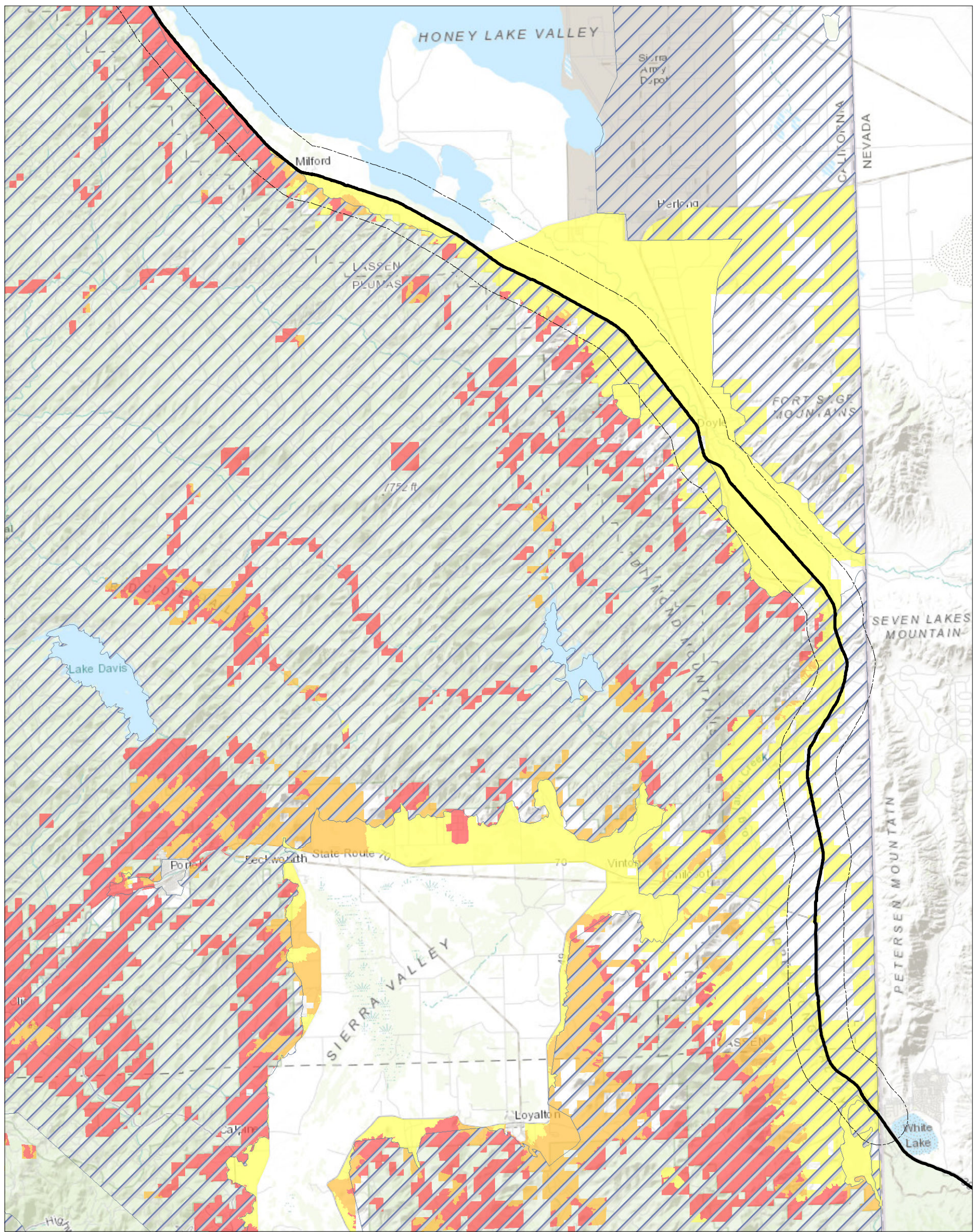


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Client/Project: Zayo Fiber Optic Line--Prineville to Reno

Figure No. **5.20-1**

Title: **Wildfire Hazards within One Mile of Proposed Prineville to Reno Fiber Optic Line**



- CPUC Fire Threat**
- Tier 2
- FIRE HAZARD SEVERITY ZONES in State Responsibility Area (SRA)**
- Moderate
 - High
 - Very High
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Notes

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Client/Project
Zayo
Fiber Optic Line--Prineville to Reno

Figure No.
5.20-1

Title
Wildfire Hazards within One Mile of Proposed Prineville to Reno Fiber Optic Line

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5.20.1.2 Fire Occurrence

There is a history of wildfire occurrences within the running line of the project, with 1,123 fires mapped by CAL FIRE from 2010 to 2018 (Appendix A). In general, the majority of these fires are started by lightning (501 reported fires) or other unknown (272 reported fires) or miscellaneous sources (222 reported fires). Equipment use accounted for 36 known fires, with 22 being started by debris. Other sources, such as smoking, campfires, arson, or playing with fire, accounted for less than 20 fires. The majority of the fires were located within Modoc County (556 reported fires), followed by Lassen County (369 reported fires) and then Sierra County (185 reported fires). Thirteen of the reported fires spanned multiple counties. Table 5.20-2 describes the distribution of responding agencies for mapped fires.

Table 5.20-1: Fire History and Responding Agency Along the Running Line (2010-2018)

Agency	Lassen County	Modoc County	Sierra County	More than One County	Total
BLM	118	37	1	3	159
CAL FIRE	87	27	1	2	117
NPS	5	--	--	--	5
USFS	159	490	183	8	840
CDFW	--	2	--	--	2
Total	369	556	185	13	1,123

Notes:

BLM= Bureau of Land Management

CAL FIRE= California Department of Forestry and Fire Protection

NPS = National Park Service

USFS = United States Forest Service

CDFW = California Department of Fish and Wildfire

Source: CAL FIRE 2020

5.20.1.3 Fire Risk

The weather station located in Alturas, California, has been tracking wind direction and speed, relative humidity, and temperature on an hourly basis for the last 10 years. Average temperatures reported from the Alturas station in the project area ranged from below zero to more than 100 degrees Fahrenheit (°F) , with an average air temperature of approximately 50°F. Average reported relative humidity was approximately 60 percent, and an average windspeed of 5 miles per hour (mph). Maximum windspeed was approximately 40 mph. Winds typically blow southwest. (Appendix B)

Primary fire risk would occur during the construction and installation of the fiber optic line. Use of machinery or “hot work” (e.g., welding) during high wind conditions, personnel smoking at a worksite, heated mufflers of vehicles or equipment, or mishandling of flammable materials could result in the ignition of a wildfire. However, the project is located along an existing transportation right-of-way that is maintained clear of vegetation and other fire hazards, creating an intrinsic fuel break. Hot work would only take place at materials storage yards, which would be fenced and paved or graveled. Equipment usage



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Wildfire

during construction would be temporary, and work areas would be constantly shifting. In addition, the majority of this project would be underground, leaving very few aboveground structures with the capacity to ignite a wildfire. Therefore, the risk of wildfire ignition as a result of this project is considered low.

Besides the ILAs and line markers, all project components because the vast majority of this project would be underground and/or contained within a preexisting right-of-way that both serves as a fire break and is regularly maintained for fire safety. Therefore, digital elevation models were not included.

5.20.1.4 Values at Risk

A variety of valuable public services, sensitive habitats, and biological resource management areas are located within 5 miles of the project running line and have the potential to be directly impacted by a wildfire ignited during construction. The project's running line is located near schools, churches, libraries, medical centers, and other public services, structures, and utilities that could be at risk in the event of a wildfire. Table 5.15-3 in Section 5.15, Public Services, lists schools within one mile of the running line. Table 5.15-4 in Section 5.15 lists churches, libraries, medical centers, and other public services within one mile of the running line. Table 5.13-4 in Section 5.13, Noise, lists a total of 1,361 sensitive receptors (e.g., residences, hospitals, places of worship, libraries, performance spaces, offices, and schools, as well as nature and wildlife preserves, recreational areas, and parks) within 1,000 feet of the running line.

Table 5.4-1 in Section 5.4, Biological Resources, details the sensitive natural vegetation communities located within the BRSA, which roughly corresponds to the Hwy 395 right-of-way. Though no federally designated or proposed critical habitat occurs within the BRSA, one critical habitat polygon for Webber's ivesia (listed as federally threatened) abuts the BRSA between Lassen County MP 0.7 and 1.0 (Figure A3, Attachment 2), and five others are located within 5 miles of the BRSA. Biological resource management areas that occur within 5 miles of the BRSA include USFWS' Modoc National Wildlife Refuge; CDFW's Bass Hill Wildlife Area, Biscar Wildlife Area, Doyle Wildlife Area, Hallelujah Junction Wildlife Area, and Honey Lake Wildlife Area; and The Nature Conservancy's Matley Ranch.

~~Primary fire risk would occur during the construction and installation of the fiber optic line. Use of machinery or "hot work" (e.g., welding) during high wind conditions, personnel smoking at a worksite, heated mufflers of vehicles or equipment, or mishandling of flammable materials could result in the ignition of a wildfire. However, the project is located along an existing transportation right-of-way that is maintained clear of vegetation and other fire hazards, creating an intrinsic fuel break. Equipment usage during construction would be temporary, and work areas would be constantly shifting. In addition, the majority of this project would be underground, leaving very few aboveground structures with the capacity to ignite a wildfire. Therefore, the risk of wildfire ignition as a result of this project is considered low.~~

5.20.1.5 Vegetation Fuels

The potential for wildfire ignition varies substantially based on seasonal factors such as vegetation density and type, prescribed burning regimes, temperature, precipitation, and vegetation assemblage. For example, species such as lichens and grasses will burn more readily due to their low moisture content but will burn quickly and at a lower temperature. Other vegetation assemblages such as spruce or pine forest



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will burn slower and more intensely but take longer to ignite. Some species such as quaking aspen act as natural firebreaks, reducing the potential intensity of ignitions in their vicinity. Other species such as juniper woodland or chaparral rely on fires to maintain a healthy vegetation community and ignite readily.

Section 5.4, Biological Resources, discusses vegetation types along the project. A total of 61 vegetation communities were mapped along the project, which are included in Appendix C. Vegetation types along the project generally include pines, junipers, aspens, montane riparian communities, brushes, chaparral, scrubs, grasslands, and meadows. As shown on Figure 5.20-1, the areas along the right-of-way with the highest fire risk occur east of Goose Lake in Modoc County and west of Honey Lake between Buntingville and Milford in Lassen County. The vegetation communities in these locations consist of fire-prone little sagebrush scrub, big sagebrush scrub, bitterbrush scrub, and Western juniper woodland. Sagebrush and juniper woodland are considered to have low fire resistance because they are comprised of plants with a combination of the following characteristics: contain volatile oils, accumulate dead woody material, are thorny or dense, have a high surface-to-volume ratio (e.g., fine needles or lacey leaves), and are prone to rapid changes in moisture content (USDA FEIS 2019¹). Because there is such variance in the vegetation types along the project alignment, the wildfire potential also varies depending on location near these vegetation types.

As part of the Scott and Burgan (2005)² Standard Fire Behavior Fuel Model, the authors categorize vegetation types (e.g., non-burnable, grass, shrub, timber) into fuel models to predict for each potential wildfire behavior and effects, including spread rate, intensity, smoke production, and crown fire behavior.

As shown on According to Figure 3 in the botanical report, the primary vegetation surrounding the ILAs is “4: anthropogenic areas of little to no vegetation.” This vegetation type corresponds to the “urban/developed (NB1)” Bergan-Scott fuel model type, which is considered a “non-burnable” fuel model type. Outside the immediate ILA footprint, secondary vegetation types include bitterbrush scrub (Herlong ILA) and little sagebrush scrub (Spanish Springs ILA), both of which are considered “Low Load, Dry Climate Grass-Shrub (GS1)” in the Bergan-Scott model. The Alturas ILA possesses vegetation type 4/fuel model NB1 for in both primary and secondary areas. Within the GS1 designation, the primary carrier of fire is grass and shrubs. Fire spread rate is moderate, flame length is low, and the extinction moisture content³ is low. While this vegetation type is indeed moderately fire-prone, the ILAs themselves will be enclosed, monitored, alarmed, and surrounded by 50-100 linear feet of paved or graveled surface in addition to the preexisting “anthropogenic areas.” As described in Section 5.20.4 (b), there is low risk of an ILA igniting a wildfire.

¹ U.S. Department of Agriculture (USDA) Fire Effects Information System (FEIS). 2019. Species search. Accessed December 14, 2020 at <https://www.feis-crs.org/feis/>.

² Scott, J., and R. Bergan. 2005. Standard Fire Behavior Fuel Models; A Comprehensive Set for Use with Rothermel's Surface Fire Spread Model. USFS Rocky Mountain Research Station General Technical Report RMRS-GTR-153. June 2005.

³ Extinction moisture content is the moisture content of dead fuels at which the fire will no longer spread (Scott and Bergan 2005).



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5.20.1.6 Evacuation Routes

No evacuation routes have been formally designated in the general plans or municipal ordinances for the Counties of Lassen, Modoc, or Sierra, or the City of Alturas.

5.20.2 Regulatory Setting

The following subsections identify federal, state, and local laws, policies, and standards for wildfire impact assessment that may be applicable to the project.

5.20.2.1 Federal

National Fire Protection Association

The National Fire Protection Association provides codes and standards (including the National Electrical Code), research, trainings, and education for fire protection. The National Fire Protection Association publishes more than 300 codes and standards that are intended to minimize the possibility and effects of fire and other risks.

5.20.2.2 State

Assembly Bill 337 – The Bates Bill

The Bates Bill (AB 337 enacted September 29, 1992) was a direct result of the great loss of lives and homes in the Oakland Hills Tunnel Fire of 1991. The Bates Bill requires CAL FIRE, in cooperation with local fire authorities, to identify very high FHSZs in LRAs throughout California. Local jurisdictions that do not follow the Bates system are required to follow, at a minimum, the model ordinance developed by the State Fire Marshal for mitigation purposes.

Assembly Bill 3819 – The Brown Bill

The Brown Bill (AB 3819 enacted September 25, 1994) expands the roof covering requirements of the Bates Bill. The Brown Bill requires a Class A roof for all new buildings, all roof repairs and replacements, for existing buildings where 50 percent or more of the roof area is re-roofed, and for buildings located within very high FHSZs. Class A roofs provide the highest resistance to fire and include coverings such as concrete, metal, or clay roof tiles.

California Department of Forestry and Fire Protection Wildland Hazard/Building Codes

Included as part of the 2007 California Building Code (CBC), CAL FIRE has established the Wildland-Urban Fire Area Building Standards, which are applicable to all structures located within an LRA very high FHSZ. These requirements establish minimum standards for materials and material assemblies and provide a reasonable level of exterior wildfire exposure protection for buildings in Wildland-Urban Interface Fire Areas. The use of ignition-resistant materials and design to resist the intrusion of flames or burning embers projected by a vegetation fire (wildfire exposure) will prove to be the most prudent effort



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California has made to try and mitigate the losses resulting from our repeating cycle of interface fire disasters.

California Building Code

The CBC contains applicable fire safety standards and the California Fire Code (CFC). The CBC follows standards recommended by the California Building Standards Commission and the latest International Fire Code. The CBC sets buildings standards, ensuring that all structures are designed to provide the required emergency access. Additionally, the CBC contains guidance on design features, including fire sprinklers, fire flow standards, emergency access roads standards, and storage of flammable materials, which comply with fire department minimum requirements.

California Fire Code (California Code of Regulations Title 24, Part 9)

Based on the 2015 International Fire Code, and as published by the California Building Standards Commission, the CFC regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The CFC addresses fire prevention and protection, life safety, safe storage, and use of hazardous materials. The CFC is a design document that sets forth the minimum requirements for hazards and contains the requirements for maintaining life safety of building occupants, protecting emergency responders, and limiting damage to a building and its contents as a result a fire, explosion, or unauthorized hazardous materials discharge.

California Public Resources Codes

A number of PRC sections are applicable to the project, as listed below:

- Code 4119: Authorizes agencies to inspect all properties except a dwelling's interior to ascertain compliance with state forest and fire laws, regulations, or use permits.
- Code 4290: Contains regulations for implementing minimum fire safety standards related to defensible space that are applicable to lands designated as very high FHSZ.
- Code 4291: Requires 100 feet of defensible space around all structures.

5.20.2.3 Local

Because CPUC has exclusive jurisdiction over project siting, design, and construction, the project is not subject to local land use and zoning regulations or discretionary permits. This section identifies local land use plans for informational purposes and to assist with CEQA review.

Lassen County General Plan

The Lassen County General Plan was adopted in September of 1999 and includes the following goals related to wildfires that are relevant to the project (Lassen County 1999, as amended):



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- OS20 Policy: The County shall continue to make protection from fire hazards a consideration in planning, land use and zoning decisions, environmental review, and project review with special concern for areas of "high" and "extreme" fire hazard.
 - Implementation Measure: OS-K The County will continue to work with the California Department of Forestry and Fire Protection or other agencies of jurisdiction in identifying and mapping areas of special fire hazard, and in adopting development criteria to assist in the protection of the public from such fire hazards.

Modoc County General Plan

The Modoc County General Plan was adopted in September 1988 and includes the following policies related to wildfires that are relevant to the project (Modoc County 1988, as amended):

- Policy 3: New development should demonstrate the availability of adequate fire protection and suppression facilities.

Sierra County General Plan Safety Element

The Sierra County General Plan was first adopted in 1996 and includes the following goals and policies related to wildfires that are relevant to the project (Sierra County 1996, as amended):

- Policy 19: Land use patterns and development standards shall minimize fire hazards.
- Policy 20: Encourage maintenance of high fire protection standards for all public and private development.

City of Alturas General Plan

The City of Alturas General Plan was first adopted in June 1987 (City of Alturas 1987, as amended). There are no wildfire goals or policies in the City of Alturas General Plan that are relevant to the project.

Modoc County Community Wildfire Protection Plan

The Modoc County Community Wildfire Protection Plan (CWPP) was developed in September of 2005 by the Modoc County Fire Safe Council in cooperation with CAL FIRE, USDA, Modoc County Rural Fire Departments, North Cal-Neva Resource Conservation and Development Council, Modoc County Office of Emergency Services, and BLM to mitigate losses from wildland fires. The Modoc County CWPP is used as a planning tool to assess the threat level and to identify measures that may be taken to reduce the danger that wildland fires pose to the communities in Modoc County. Although the Modoc County CWPP does not contain any specific goals or policies that are relevant to the project, it does discuss the use of US 395 as one of the major highways in the county that could be used as an evacuation route in the event of a fire (Modoc County 2005).



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Lassen County Community Wildfire Protection Plan

The latest Lassen County CWPP was developed in December of 2019 by the Lassen County Fire Safe Council in cooperation with CAL FIRE, the U.S. Forest Service, BLM, and Sierra Pacific Industries to develop and monitor activities necessary to protect the communities of Lassen County from risk of wildfires. Several fuel treatment projects are identified in the CWPP, however none of the projects identified would involve US 395 (Lassen County 2019).

Sierra County Community Wildfire Protection Plan

The latest Sierra County CWPP was developed in December of 2014 by the Sierra County fire safe council in coordination with CalFire, local fire districts, and the U.S. Forest Service to provide a comprehensive assessment of the wildfire hazards and risks and provide potential projects to mitigate those hazards within the Sierra County. US 395 only passes through a small portion of Sierra County, and the Sierra County CWPP does not contain any specific goals or policies that are relevant to the project (Sierra County 2014).

5.20.2.4 CPUC Standards

No additional CPUC standards were identified which would apply to wildfire management of this project.

5.20.3 CEQA Impact Criteria

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.20.4 Impact Analysis

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

No Impact. As described in Section 3.0, Proposed Project Description, and Section 5.9, Hazards, Hazardous Materials, and Public Safety, the project would not conflict with any adopted emergency response or evacuations plans. Although not officially designated as an evacuation route, US 395 is a major highway that would likely be used during an evacuation if there was a large fire or other emergency in the area that required mass evacuations in either Modoc, Lassen, or Sierra Counties. Emergency access for emergency vehicles and public evacuation would be maintained throughout construction, and no full roadway closures would be required. In addition, the applicant would prepare a traffic management plan per APM TRA-1 that would coordinate traffic control procedures associated with construction. As access would be preserved during all construction activities, the project would not impair an adopted emergency response or emergency evacuation plan. Once constructed, the project would be located underground and would not result in any long-term impacts to emergency response or evacuation. Therefore, no impact would occur.

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

No Impact. The project would involve the installation of fiber optic conduit within existing transportation right-of-way. ~~The project would primarily be installed underground and managed remotely and does not include the installation or operation of any residential housing units, commercial or retail businesses, or any industrial or manufacturing facilities.~~ The primary aboveground project component would be the ILAs. Each ILA would be equipped with an exterior motion-sensor floodlight, air conditioner, and 100 kw backup power generator. The interior of the ILA would house an electrical cabinet with control cabling and surge suppressor, HVAC control panel, exhaust fan, security alarm, HVAC and generator fail alarms, and emergency exit lighting. All electrical components would be grounded and a wired smoke detector would also be installed inside. Electrical power would be obtained through an underground tie-in to existing distribution lines. Tie-ins would occur at vaults. With these design specifications, the risk that a fire could ignite within an ILA is low.



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The remainder of the project would primarily be installed underground and managed remotely and does not include the installation or operation of any residential housing units, commercial or retail businesses, or any industrial or manufacturing facilities. Therefore, there would be no occupants as a result of the project that would be potentially affected by wildfire-mobilized pollutant concentrations or the uncontrolled spread of a wildfire. Therefore, no impact would occur.

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

Less Than Significant Impact. Primary fire risk would occur during the construction and installation of the fiber optic line. The line would be installed using a variety of techniques including trenching, plowing, and horizontal directional boring. The construction activities associated with these installation activities would involve the use of vehicles and other heavy machinery, depending on the activity. Use of machinery or “hot work” (e.g., welding) during high wind conditions or personnel smoking at a worksite could result in the ignition of a wildfire. Heavy equipment or passenger vehicles could drive through vegetated areas, which could result in ~~the an~~ increased risk of fire. Heated mufflers or improper disposal of cigarettes or bottles with solar magnifying properties (such as glass) could potentially ignite surrounding vegetation. Additionally, mowers or plows have the potential to ignite wildfires if the equipment blades strike rocks or metal objects.

Additionally, as detailed in Section 5.9, Hazards, Hazardous Materials, and Public Safety, the construction and operation of the project would involve the use of flammable materials including fuels such as gasoline or diesel, hydraulic oils, paints, solvents, or other industrial chemicals necessary for maintaining vehicles and equipment. The risk of fire associated with these materials is generally related to improper use or storage. These flammable materials could further exacerbate the spread of a wildfire or ignite a fire quicker if a spark were to occur in the vicinity of these materials.

The project crosses 81.76 miles of moderate FHSZ, 12.30 miles of high FHSZ, and 0.16 mile of very high FHSZ and 61 vegetation communities possessing varying wildfire potential. If a fire were to ignite as a result of construction activities, it could be swept offsite by prevailing winds. Such a wildfire could, if not immediately extinguished, pose a risk to life and property adjacent to the running line. However, the project is located along an existing transportation right-of-way that is maintained clear of vegetation and other fire hazards, creating an intrinsic fuel break. Equipment usage during construction would be temporary, and work areas would be constantly shifting. However, any fire that would escape control or spread into the surrounding area could result in damage to the environment, and therefore, the risk of fire as a result of project construction is considered potentially significant.

In accordance with existing regulatory requirements, all construction equipment is required to be equipped with fire suppression equipment (such as a fire extinguisher). Additionally, APM FIRE-1, Fire Protection Plan, would require the applicant to prepare a Fire Protection Plan prior to construction, which would outline fire prevention and response measures. APM FIRE-1 would include a Worker Environmental Awareness Program to train personnel on the fire hazards associated with the project, restrict work during Red Flag conditions, and would require that workers be provided ~~workers with fire~~



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Wildfire

extinguishers and other necessary firefighting equipment to put out small fires. APM FIRE-1 would ensure that the risk from wildfires is reduced during construction activities. Therefore, the impact would be less than significant.

During operations, management of the telecommunications infrastructure would generally occur remotely, with onsite maintenance only as necessary (as detailed in Section 3.8, Operations and Maintenance). Access vaults would be accessed periodically for routine maintenance via US 395 and other existing and maintained roads. All periodic maintenance activities would comply with local and state regulations governing wildfire prevention. Maintenance crews would park on unvegetated areas, and vehicles would be equipped with standard safety gear, including fire extinguishers that could put out small fires, if necessary. No maintenance that would exacerbate fire risk or result in temporary or ongoing impacts to the environment is anticipated to be required. Therefore, operation of the project would result in a less than significant impact related to installation or maintenance of infrastructure that may exacerbate the risk of wildfires.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The project would primarily be installed underground within existing roadway right-of-way. The proposed construction area is relatively flat, and in instances where topography precludes burial of the conduit, it would be strung on existing bridges (e.g., riverbanks). Thus, project installation would not permanently affect drainage or topography in the project area. Therefore, the project would not affect the potential for people or structures to be exposed to significant risks or changes in baseline risk including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes should a wildfire occur in the vicinity of the project. No impact would occur as a result of project installation or operations under this criterion.

5.20.5 Draft Environmental Measures

Applicant Proposed Measures

APM FIRE-1: Construction Fire Prevention Plan

A project-specific Construction Fire Prevention Plan for construction of the project shall be submitted for review to the CPUC and state and local fire agencies at least 90 days before the start of any construction activities in areas designated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall also include federal, state, or local agencies with jurisdiction over areas where the project is located. The final Plan shall be approved by the CPUC at least 30 days prior to the initiation of construction activities. The Plan shall be fully implemented throughout the construction period and include the following at a minimum:

- The purpose and applicability of the Plan
- Responsibilities and duties



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- Preparedness training and drills
- Procedures for fire reporting, response, and prevention that include:
 - Identification of daily site-specific risk conditions
 - The tools and equipment needed on vehicles and to be on hand at sites
 - Reiteration of fire prevention and safety considerations during tailboard meetings
 - Daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity
 - Coordination procedures with federal and local fire officials
 - Crew training, including fire safety practices and restrictions
 - Method(s) for verifying that all Plan protocols and requirements are being followed

A project Fire Marshal or similar qualified position shall be established to enforce all provisions of the Construction Fire Prevention Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. Construction activities shall be monitored to ensure implementation and effectiveness of the Plan.

