

1 **5.21 Mandatory Findings of Significance**

2
3 **5.21.1 Environmental Impacts and Assessment**

4
5 This section discusses mandatory findings of significance, as well as potential cumulative and growth-
6 inducing impacts, related to the proposed project. CEQA Guidelines Section 15065 requires that the lead
7 agency determine whether the proposed project would have a significant effect on the environment. Table
8 5.21-1 contains the criteria for making the determination.
9

Table 5.21-1 Mandatory Findings of Significance Criteria

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

10
11 *a. Does the project have the potential to substantially degrade the quality of the environment,*
12 *substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels,*
13 *threaten to eliminate a plant or animal community, substantially reduce the number or restrict the*
14 *range of a rare or endangered plant or animal or eliminate important examples of the major*
15 *periods of California history or prehistory?*

16
17 **Biological Resources**

18 The proposed project would be installed along an existing right-of-way within the bed or shoulder of
19 established roadways. The topography in the proposed project area is relatively flat, and land use in the
20 area can be generally classified as rural residential and agricultural (e.g., orchards and grazing). Olive
21 orchards are present in the central portion of the proposed project area along Scout and Olive Streets, and
22 open woodland occurs in the vicinity of Happy Valley Road at Spring Gulch and along the western
23 portion of Cloverdale Road to the western end of the project area. There are 29 drainages and ~~eight~~ nine
24 wetlands in the proposed project area, which are all considered potentially jurisdictional. APM BIO-1,
25 APM BIO-2, APM BIO-3, APM BIO-4, APM BIO-5, and APM BIO-6 would ensure that ~~All~~ aquatic
26 features and associated riparian vegetation would be avoided, and no intact woodlands or forest habitats

1 would be impacted by the proposed project. MM GEN-1 would require the applicant to implement all
2 proposed APMs. Thus, existing measures are sufficient to reduce impacts to less than significant.
3 Furthermore, a Lake and Streambed Alteration Agreement (LSAA) may be required for construction.
4 Therefore, the California Department of Fish and Wildlife has authority to impose conditions to increase
5 resource protection through LSAA consultation.

6
7 While no special status plant species were observed during surveys, several have a moderate potential to
8 occur in the proposed project area, including Nuttall's ribbon-leaved pondweed (*Potamogeton epihydrus*),
9 pink creamsacs (*Castilleja rubicundula* var. *rubicundula*), red bluff dwarf rush (*Juncus leiospermus* var.
10 *leiospermus*), and silky cryptantha (*Cryptantha crinita*). All of these plant species are typically found in
11 riparian, wetland or vernal pool habitats, which would all be avoided because installation of the fiber-
12 optic communications cable (telecom line) would involve boring under all wetlands and drainage features,
13 and no vernal pools were observed during surveys. Therefore, the proposed project would not reduce the
14 number or restrict the range of any rare or endangered plant species.

15
16 A bald eagle was observed during surveys, and there is a moderate potential for pallid bat (*Antrozous*
17 *pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus*
18 *blossevillii*) to occur in the proposed project area. There is a low potential for western spadefoot (*Spea*
19 *hammondii*), western pond turtle (*Emys marmorata*), valley elderberry longhorn beetle (*Desmocerus*
20 *californicus dimorphus*), conservancy fairy shrimp (*Branchinecta conservatio*), vernal pool tadpole
21 shrimp (*Lepidurus packardii*), vernal pool fairy shrimp (*Branchinecta lynchi*), California red-legged frog
22 (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), bank swallow (*Riparia riparia*), tricolored
23 blackbird (*Agelaius tricolor*), northern spotted owl (*Strix occidentalis caurina*), Swainson's Hawk (*Buteo*
24 *swainsoni*), and Fisher (*Pekania pennant*) to occur in the project area. As discussed in greater detail in
25 Section 5.4, "Biological Resources," the applicant would implement Applicant Proposed Measures
26 (APMs) as part of the proposed project, which would reduce the potential for significant impacts to all
27 species except nesting birds.

28
29 Impacts on nesting birds may be significant if construction activities occur within the nesting bird season,
30 February 1 to August 31. The applicant would be required to implement Mitigation Measure (MM)
31 **BIO-1**, requiring nesting bird surveys to be completed if work occurs in the nesting bird season. If there
32 are active nests, a buffer would be established, and a biological monitor would be required to be present if
33 construction were to occur in the vicinity of the nests. With mitigation, the proposed project would not
34 reduce the number or restrict the range of any rare or endangered animal species. There are no known
35 native wildlife nursery sites or migratory routes for any native resident or migratory fish or wildlife
36 species in the proposed project area. The proposed project would not fragment any wildlife habitat. The
37 impacts would be less than significant after implementing the above-stated mitigation measure and
38 APMs.

39 40 **Cultural Resources**

41 As described in Section 5.5, "Cultural Resources," several known historical resources were identified
42 within the general vicinity of the proposed project area; however, one historical resource (Igo Inn) was
43 assumed to be eligible for the California Register of Historic Resources in this environmental document,
44 but is not within the area of direct impact. The proposed project would be installed on the southern
45 (opposite) side of the existing roadway from the Igo Inn. As the roadway acts as a buffer, the proposed
46 project would not likely cause vibratory impacts to the structure. The visual and auditory impacts would
47 not constitute a substantial adverse change, as they would not involve physical demolition, destruction,
48 relocation, or alteration of the resource or its immediate surroundings. The impacts also would be
49 temporary in nature. Although it is unlikely that a cultural resource would be discovered during
50 excavation, there is potential for discovery. The applicant would implement APMs and Mitigation

Measures, described in “Section 5.5, Cultural Resources,” to reduce any potential impacts to less than significant.

b. Does the project have impacts that are individually limited, but cumulatively considerable?

A cumulative impact is when “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines section 15355). Table 5.21-2 lists past, current, and probable future projects in the proposed project vicinity identified during preparation of this environmental document consistent with requirement in CEQA Guidelines section 15130(b)(1)(A).

Projects Considered

Table 5.21-2 lists past, current, and probable future projects in the proposed project vicinity identified during preparation of this environmental document. Generally, the geographic scope used in the search for past, current, or probable future projects was limited to projects within 5 miles of the proposed project area, because the proposed project’s environmental impacts have been determined to be relatively minor and primarily locally concentrated. With the exception of air quality and GHG emissions, the proposed project would not have regional impacts, and as described below, the proposed project’s air quality impacts would not be cumulatively considerable. The list in Table 5.21-2 was compiled by contacting local, state, and federal agencies regarding planned projects and projects currently under construction. The following agencies were queried:

- Shasta County
- Bureau of Land Management, Planning Project Search
- California Department of Transportation

As described, projects generally within 5 miles were evaluated for inclusion in the cumulative impacts analysis. Projects carried forward for analysis in this section and listed in Table 5.21-2 are probable future projects with impacts that would combine with impacts of the proposed project.

Table 5.21-2 Cumulative Project List

No.	Project Name	Project Description	Location and Distance from Proposed Project Area	Status	Duration of Construction
1	Gas Point Road Widening	The project would involve a two-way left turn lane, paved and unpaved shoulders to reduce the number of crash frequencies and severity related to vehicles slowing and stopping to make left turns along Gas Point Road. Multiple utilities would be relocated along the corridor. Culverts would be added and lengthen throughout the project. In addition, a temporary construction easement and staging would be acquired at the northeast end of the project.	Gas Point Road between Keri Lane and Charles Street. Approximately 4.5 miles southeast of the proposed project area.	Estimated construction start date: 7-30-2018	Approximately 30 days.
2	Olinda Road Widening Phase II	The project would involve wider paved shoulders along the Olinda Road corridor, enhancing motorists ability to recover and providing space for broken down vehicles to pull out of the travelled	Olinda Road between Sammy Lane and Red Leaf Lane. Approximately 1	Estimated construction start date: 7-30-2018	Approximately 35 days.

Table 5.21-2 Cumulative Project List

No.	Project Name	Project Description	Location and Distance from Proposed Project Area	Status	Duration of Construction
		way. Widening of the roadway would involve adding 3-foot-wide paved shoulders to the existing 1-foot shoulder, providing a total shoulder width of 4 feet on both sides of the roadway. Utility poles and culverts would be replaced with some culverts being lengthened.	mile east of the proposed project area.		
3	Gas Point Road at No Name Ditch Bridge Replacement	The project involves replacing the existing bridge with a wider box culvert and widen the approaches. The roadway would conform to the existing roadway to the east and the proposed roadway to the west. The widening would involve adding a two-way-left turn lane. Multiple utility poles would be re-located along the corridor. A temporary detour would be constructed to the south of the existing box culvert so the roadway remains open to the public. A temporary construction easement and staging would be required at the northeast end of the project.	Gas Point Road, approximately 175 feet east of the intersection of Charles Street. Approximately 5 miles southeast of the proposed project area.	Estimated construction start date: 7-8-2019	Approximately 80 days.
4	Lower Gas Point Road at North Fork Cottonwood Creek Bridge Replacement	Shasta County Public Works is preparing to replace the Lower Gas Point Road at North Fork Cottonwood Creek Bridge Replacement. The existing bridge is a two-span 200-foot-long by 12-foot-wide steel truss structure. The proposed bridge is a 220-foot-long by 23.54-foot-wide, two-span cast in place, and pre-stressed box girder bridge on a slightly different alignment. The new bridge alignment is located directly south of the existing alignment.	Approximately 5 miles southwest of the proposed project area.	Estimated construction start date: 7-8-2019	Approximately 100 days.

Sources: Ankeny 2017

1
2 No past projects were identified that would have the potential to cause future cumulative impacts not
3 represented by existing conditions. The Olinda Road Widening Phase II Project would occur on Olinda
4 Road near two of the proposed DLC sites; however, the proposed project is scheduled to be completed
5 several months before the Olinda Road Widening Project would occur. Thus, for the purpose of this
6 analysis, it is assumed that existing baseline conditions are indicative of past and current projects, and so
7 the cumulative analysis is limited to the potential contribution of the proposed project in conjunction with
8 planned and reasonably foreseeable future projects.
9

10 **Cumulative Impacts**

11 The proposed project would have no impact on mineral resources, or on population and housing;
12 therefore, it would not have a cumulatively considerable contribution when considered in combination
13 with reasonably foreseeable projects.
14

1 ***Aesthetics***

2 Construction activities and features may increase visual contrast and reduce vividness, intactness, and
3 unity within the proposed project area. Construction equipment and activities would introduce new and
4 additional elements in short-range views. However, following installation of the telecom line, disturbed
5 areas would be re-graded and restored, resulting in minimal long-term evidence of change to the
6 landscape along the road edge. Although implementation of the proposed project in combination with
7 reasonably foreseeable projects could result in potential cumulative visual impacts, construction of the
8 proposed project would occur over 60 to 120 days and the presence of construction activities and
9 equipment at locations throughout the proposed project area would be temporary. As a result, the
10 proposed project would cause minimal changes to the visual quality and character of the area and would
11 not have a considerable contribution to a cumulative impact.

12
13 ***Agriculture and Forestry Resources***

14 The proposed project area would be located immediately adjacent to Prime Farmland, Unique Farmland,
15 and Farmland of Statewide Importance. However, as described in Chapter 4, “Project Description,”
16 proposed project components would be installed along Shasta County roads and private roads via
17 directional boring, plowing, and trenching and would not occur within areas that are actively cultivated
18 for agricultural purposes. The proposed project would further avoid any potential impact because it would
19 require that the applicant avoid any orchards adjacent to the proposed project alignment. Similarly, many
20 of the other reasonably foreseeable projects considered are related to infrastructure improvements, which
21 would not likely have substantial impacts on agricultural resources. As a result, the proposed project
22 would not have a considerable contribution to a cumulative impact.

23
24 ***Air Quality/Greenhouse Gases***

25 The proposed project would contribute some amount to existing air quality issues in the proposed project
26 area and Sacramento Valley Air Basin. As discussed in Section 5.3, “Air Quality,” the proposed project
27 area is in nonattainment for the criteria pollutants ozone and particulate matter less than 10 microns.
28 Emissions of criteria pollutants would result from vehicle and equipment exhaust, as well as fugitive dust
29 from travel, earthmoving, and site grading during construction of the proposed project. Plowed and
30 trenched installation for the underground telecom line would involve ground disturbing activities that
31 would generate fugitive dust. Construction emissions estimates, along with the thresholds of significance
32 for criteria pollutants emitted during construction, are all below the “B” thresholds of significance; see
33 Section 5.3, “Air Quality.” Thus, the proposed project would be consistent with Shasta County Air
34 Quality Management District’s management plans for ozone and particulate matter less than 10 microns.

35
36 As described in Section 5.7, “Greenhouse Gas Emissions,” the proposed project would release
37 approximately 75 metric tons of carbon dioxide equivalent emissions during construction, and would not
38 release any GHG emissions during operation. While any amount of GHG emissions could theoretically
39 contribute to climate change, this amount would be nominal and would not be anticipated to have any
40 effect or interfere with California’s ability to meet its emissions reduction targets under Assembly Bill 32.

41
42 Accordingly, the proposed project in combination with reasonably foreseeable projects could result in
43 potential cumulative air quality and GHG impacts. However, APMs would reduce potential project
44 impacts to less than significant, and all project-related impacts would be temporary in nature and would
45 not last beyond the approximate 60 to 120 day construction period. As a result, the proposed project
46 would not have a considerable contribution to a cumulative impact.

1 ***Biological Resources***

2 The proposed project area includes drainages and wetlands that are all considered to be potentially
3 jurisdictional. However, the proposed project design would avoid such jurisdictional water entirely by
4 boring underneath. Special status plants and wildlife were also identified to be present within the
5 proposed project area. Although the proposed project would be constructed within the existing right-of-
6 way, special status plants in the proposed project area could be impacted if invasive plants are spread into
7 areas of native vegetation. In addition, construction activities could impact special status wildlife or
8 nesting birds. Accordingly, the proposed project in combination with reasonably foreseeable projects
9 could have a potential cumulative effect on biological resources. However, APMs and mitigation
10 measures would reduce potential project impacts to less than significant, and all project-related impacts
11 would be temporary in nature and would not last beyond the approximate 60- to 120-day construction
12 period. As a result, the proposed project would not have a considerable contribution to a cumulative
13 impact.

14
15 ***Cultural Resources/Tribal Cultural Resources***

16 Several known historical resources were identified within the general vicinity of the proposed project
17 area; however, one historical resource (Igo Inn) was assumed to be eligible for the California Register of
18 Historic Resources in this environmental document, but is not within the area of direct impact. In
19 addition, consultation with California Native American tribes in accordance with Assembly Bill 52
20 resulted in the identification of the Cloverdale Cemetery as an area of concern for the Wintu Tribe of
21 Northern California & Toyon-Wintu Center. Implementation of the proposed project in combination with
22 implementation of other reasonably foreseeable projects has the potential to uncover unknown cultural
23 resources, thus resulting in a potential cumulative effect on cultural resources if unmitigated. APMs and
24 mitigation measures would reduce potential project impacts to less than significant by ensuring proper
25 identification and treatment of both known and undiscovered resources. Project-related impacts would be
26 temporary in nature and would not last beyond the approximate 60- to 120- day construction period. As a
27 result, the proposed project would not have a considerable contribution to a cumulative impact.

28
29 ***Energy***

30 The proposed project would result in less than significant impacts on the wasteful, inefficient, or
31 unnecessary use of energy due to compliance with fuel efficiency standards for heavy-duty vehicle and
32 off-road equipment use during construction. Similar to future telecommunication projects, any cumulative
33 projects would be subject to various federal and state regulations, including the Low Carbon fuel
34 Standard, Pavley Clean Car Standards, and the Low Emission Vehicle Program, which would serve to
35 reduce the transportation fuel demand by cumulative projects.

36
37 Additionally, cumulative projects that include commercial and residential building construction and
38 operation would be required to comply with the California Green Building Standard Code, which includes
39 increasingly stringent energy efficiency standards for cumulative projects to minimize the wasteful and
40 inefficient use of energy. Future development projects would also be required to meet even more stringent
41 requirements including the objectives set in the AB 32 Scoping Plan, which would seek to make all new
42 constructed residential homes net-zero energy consumers by 2020 and all new commercial buildings net-
43 zero energy consumers by 2030.

44
45 The proposed project would not contribute to a substantial demand on energy resources and services
46 because no new regional energy facilities would be required to be constructed as a result of the
47 incremental changes in energy demand resulting from such projects. With adherence to the increasingly
48 stringent vehicle efficiency standards as well as implementation of design features that would reduce
49 energy consumption, the proposed project would not contribute to a cumulative impact related to the

1 wasteful or inefficient use of energy. As such, the proposed project would not result in a cumulatively
2 considerable contribution to energy resource impacts.

3 4 ***Geology and Soils***

5 The proposed project area is relatively flat and is not conducive to landslides, on- or offsite, nor is it in an
6 area of known liquefaction danger. In addition, it does not intersect with any known Alquist-Priolo
7 Earthquake Fault Zone. Excavations would be relatively shallow (approximately 40 inches) and, for the
8 most part, would be filled within 24 hours. However, the proposed project would involve trenching, and
9 bare soils would be exposed immediately following construction and would become more susceptible to
10 erosion. As a result, the proposed project, in combination with other reasonably foreseeable projects,
11 could have a potential cumulative effect with regard to soil erosion if unmitigated. All projects would be
12 required to comply with the requirements of the State Water Resources Control Board (SWRCB) National
13 Pollutant Discharge Elimination System (NPDES) permits. In addition, the applicant would prepare a
14 Stormwater Pollution Prevention Plan (SWPPP) outlining best management practices to control discharge
15 from construction areas. APMs and mitigation measures would reduce potential project impacts to less
16 than significant, and all project-related impacts would be temporary in nature and would not last beyond
17 the approximate 60- to 120-day construction period. As a result, the proposed project would not have a
18 considerable contribution to a cumulative impact.

19 20 ***Hazards and Hazardous Materials***

21 During construction of the proposed project, common hazardous materials such as gasoline, diesel fuel,
22 motor oil, antifreeze, transmission fluids, and hydraulic fluids would be used to operate construction
23 equipment. Operation and maintenance activities would include periodic vehicle trips to Digital Loop
24 Carrier cabinets to connect and disconnect customers, and periodic vegetation trimming. The proposed
25 project in combination with reasonably foreseeable projects would transport, use, or dispose of hazardous
26 materials and petroleum products in accordance with all applicable federal, state, and local regulations.
27 However, accidental releases or spills could still occur, representing a potential hazard to the public and
28 environment during construction, which could result in a potential cumulative impact. Because of the
29 temporary nature of the construction activity, lasting less than six months (and much more briefly in any
30 one location along the alignment), the transport, use, and/or disposal of small quantities of hazardous
31 materials is not routine or considered a permanent aspect of the proposed project.

32
33 APMs and mitigation measures would reduce potential project impacts to less than significant. All
34 project-related impacts would be temporary in nature, and would not last beyond the approximate 60 to
35 120 day construction period. As a result, the proposed project would not have a considerable contribution
36 to a cumulative impact.

37 38 ***Hydrology and Water Quality***

39 Construction of the proposed project would involve ground disturbance and trenching that has the
40 potential to increase sediment erosion and transport within the proposed project area, possibly degrading
41 the water quality of receiving waters within and adjacent to the proposed project area. The majority of the
42 proposed project would involve the installation of the telecom line underground, which would not alter
43 the existing drainage patterns of the area. The proposed project would involve the construction of seven
44 new 2- by 3-foot DLC cabinets. While these cabinets would constitute new impervious surfaces, their
45 small size would mean that, collectively, they would contribute to a negligible increase in runoff in the
46 proposed project area. As a result, the proposed project in combination with other reasonably foreseeable
47 projects could result in a potential cumulative effect. However, all projects would be required to comply
48 with the requirements of the SWRCB NPDES permits. In addition, the applicant would prepare a SWPPP
49 outlining best management practices to control discharge from construction areas. APMs would reduce
50 potential project impacts to less than significant, and all project-related impacts would be temporary in

1 nature and would not last beyond the approximate 60 to 120 day construction period. As a result, the
2 proposed project would not have a considerable contribution to a cumulative impact.

3 4 ***Land Use and Planning***

5 Physical division of an established community could occur through construction of physical barriers or
6 obstacles to access and circulation. The proposed project would involve installation of
7 telecommunications infrastructure that would be buried in conduit within utility easements in the
8 shoulders of existing roadways. Once installation of the proposed telecommunications infrastructure is
9 complete and operational, the proposed project's aboveground physical infrastructure would be limited to
10 seven DLC sites, which would include a 2- by 3- by 4-foot equipment cabinet, an 8-inch by 8-inch by 2-
11 foot cross connect box, and a 20-square-foot area of gravel around each equipment cabinet. Similarly,
12 many of the other reasonably foreseeable projects considered are related to infrastructure improvements,
13 which would not likely have conflicts with existing land uses. The proposed project would not disrupt or
14 physically divide surrounding communities and would not conflict with applicable policies in the Shasta
15 County General Plan. As a result, the proposed project would not have a considerable contribution to a
16 cumulative impact.

17 18 ***Noise and Vibration***

19 During construction, equipment operation would generate noise and vibration to install proposed project
20 components. Most of the 735 residences within 1,000 feet of the proposed alignment are more than 100
21 feet from the proposed alignment and would not be exposed to the maximum noise levels. Plowing and
22 trenching construction techniques used for buried line installation, as well as directional boring and
23 general operation of construction equipment, would produce groundborne vibration but would be well
24 below Federal Transit Administration thresholds. Operation of the proposed project would not result in
25 any groundborne vibration or groundborne noise levels, because the telecom line would be buried along
26 existing roads. APMs and mitigation measures would reduce potential project impacts to less than
27 significant and construction-related noise would be temporary, lasting an estimated 60 to 120 days.
28 Project construction activities in combination with construction of other reasonably foreseeable projects
29 would not occur at the same time nor would it be concentrated in one area. As a result, the proposed
30 project would not have a considerable contribution to a cumulative impact.

31 32 ***Recreation/Public Services/Utilities***

33 Project construction crews are expected to be composed of a maximum of 20 to 30 employees on site at
34 any given time. Crews would be hired locally, so there would be no influx of large groups of employees
35 from outside of the region. Because construction crews would only temporarily occupy each segment of
36 the proposed project area before moving to install additional segments, expanded recreational resources,
37 public services, and utilities are not needed. Project construction in combination with other reasonably
38 foreseeable projects would not occur along the proposed alignment at the same time, nor would it be
39 concentrated in one area. As a result, the proposed project would not have a considerable contribution to a
40 cumulative impact.

41 42 ***Transportation and Traffic***

43 During the construction period, a maximum of 22 workers would be needed for all project components,
44 generating a total of 44 daily one-way trips. Additional trips would be generated for delivery of
45 construction equipment. Some construction workers and equipment delivery may utilize Interstate 5, State
46 Route 273, or other roadways identified as regionally significant corridors in the regional transportation
47 plan; however, these trips would be negligible compared to existing traffic volumes. Operation and
48 maintenance of the telecom line is expected to be minimal and not require any additional disturbance of
49 roadway lanes. Therefore, the proposed project would not increase population or vehicle trips, or

1 otherwise induce growth. However, the implementation of the proposed project in combination with
2 implementation of other reasonably foreseeable projects could result in additional trips, lane closures, and
3 detours on a more regional level. Such effects could result in a potential cumulative impact if unmitigated.
4 However, APMs and mitigation measures would reduce potential project impacts to less than significant,
5 and all project-related impacts would be temporary in nature, and would not last beyond the approximate
6 60 to 120 day construction period. As a result, the proposed project would not have a considerable
7 contribution to a cumulative impact.

8 9 **Wildfire**

10 During construction of the proposed project, flammable or combustible liquids such as gasoline, diesel
11 fuel, motor oil, antifreeze, transmission fluids, and hydraulic fluids would be used to operate construction
12 equipment. Operation and maintenance activities would include periodic vehicle trips to Digital Loop
13 Carrier cabinets to connect and disconnect customers, and periodic vegetation trimming.

14 The proposed project in combination with reasonably foreseeable projects would involve the use of
15 similar construction equipment and on-road vehicles (e.g., delivery trucks, light-duty vehicles, off-road
16 construction equipment, heavy-duty diesel vehicles, and worker vehicles), and therefore, could create an
17 increased risk of fire ignition by equipment parked on or near dry vegetation.

18
19 Any flammable or combustible liquids spilled during construction would also cumulatively contribute to
20 an increased risk of fire if ignited by an open flame or spark. Accidental releases or spills of the
21 aforementioned flammable or combustible liquids could occur, representing a potential risk of wildfire to
22 the public and environment during construction, which could result in a potential cumulative impact.
23 However, APMs and mitigation measures would reduce cumulative potential project impacts to less than
24 significant by reducing the risk of wildland fires by ensuring that flammable materials are labeled, stored,
25 and used appropriately; ensuring that contractors are properly trained in handling flammable materials;
26 and requiring that spill clean-up kits be provided and kept on site during construction to clean up any
27 spilled flammable liquids.

28
29 Furthermore, because of the temporary nature of the construction activity, lasting less than six months
30 (and much more briefly in any one location along the alignment), the use of construction equipment and
31 vehicles are not considered a permanent and frequent aspect of the proposed project. Operation and
32 maintenance activities would be temporary, intermittent, and short-term. APMs and mitigation measures
33 would reduce potential project impacts to less than significant. All project-related impacts would be
34 temporary in nature, and would not last beyond the approximate 60 to 120 day construction period. As a
35 result, the proposed project would not have a considerable contribution to a cumulative impact.

36 37 **c. Does the project have environmental effects which will cause substantial adverse effects on human** 38 **beings, either directly or indirectly?**

39
40 The proposed project would not cause substantial adverse effects on human beings either directly or
41 indirectly. The proposed project would result in temporary impacts to human health during construction,
42 including changes to air quality, exposure to geologic hazards, and exposure to hazardous materials. As
43 discussed in Section 5.3, "Air Quality," air quality effects would be less than significant. As discussed in
44 Section 5.8, "Hazards and Hazardous Materials," hazard impacts would be less than significant with
45 implementation of APMs and mitigation measures, including preparation and implementation of a
46 Hazardous Materials Management Plan and implementation of an updated Spill Prevention Control and
47 Countermeasure Plan. Operation and maintenance activities would be comparable to current activities,
48 and no additional impacts to human beings would occur.

This page left blank intentionally