

## 1. PROJECT OVERVIEW

### 1.1 PROJECT BACKGROUND

Level (3) Communications, LLC [Level (3)], a U.S. telecommunications company, is building an international fiber optic network optimized for Internet technology. The company is currently connecting various city pairs in the United States by constructing a national 15,000-mile long-haul network mainly located within existing utility right-of-way (ROW) for the transmission of voice and data services. Approximately 2,000 miles of this network will be located in California (Figure 1). The California portion of the network, herein referenced as the Level 3 Communications Infrastructure Project (project, or network), is the subject of this environmental review.

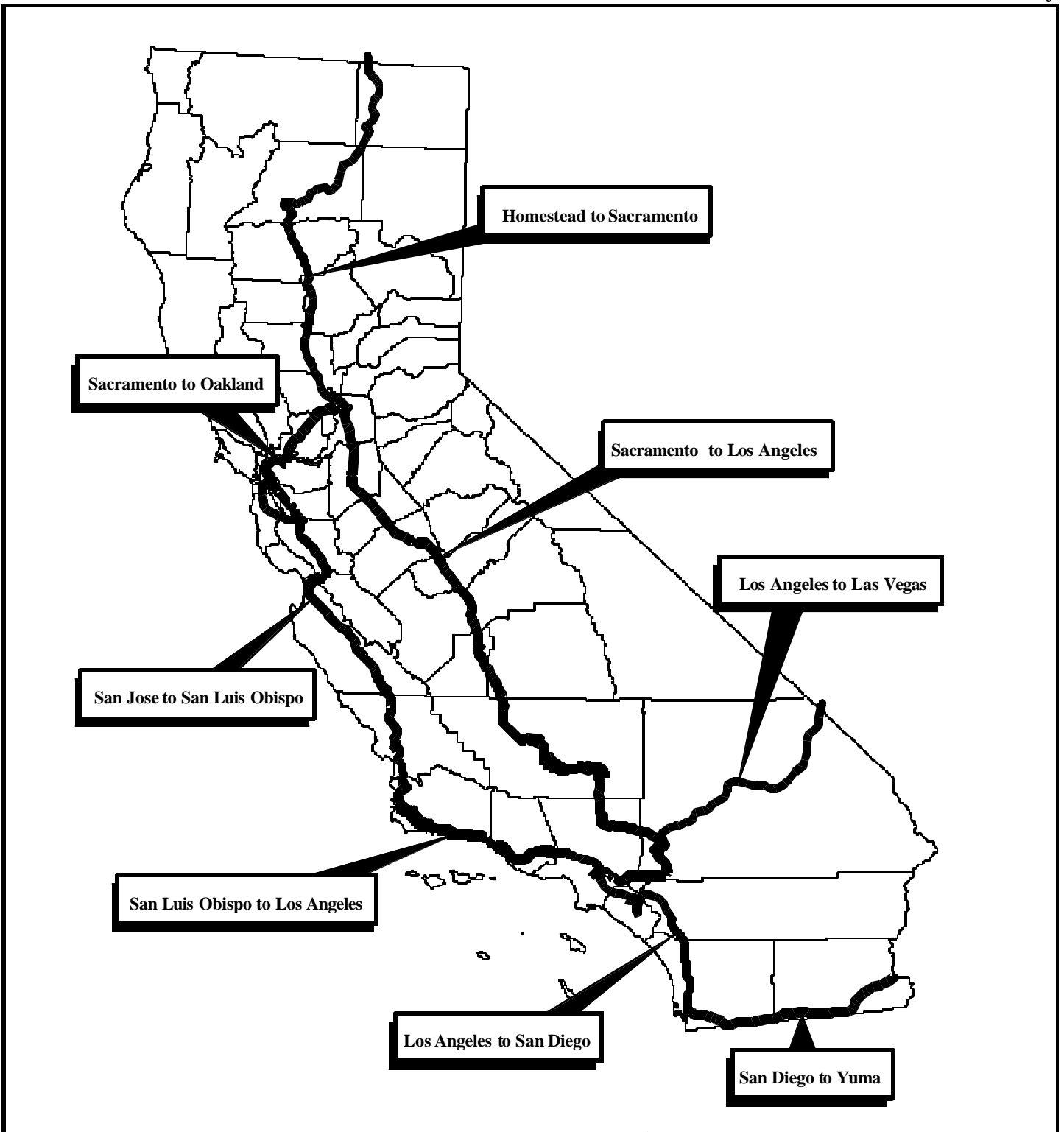
In Decision No. 98-03-066, issued March 26, 1998 (Decision), the California Public Utilities Commission (CPUC or Commission) granted Level (3) a Certificate of Public Convenience and Necessity (CPCN) to provide services to the public as a facilities-based, competitive local exchange carrier. The Commission's Decision allows Level (3) to construct underground innerduct and cable installation and support facilities (e.g., emergency power supply) within existing utility ROWS, subject to certain conditions and the "Environmental Mitigation Measures" specified in the Commission's Negative Declaration IX (Appendix D of the subject decision).

In issuing the Decision, the Commission concluded that implementation of the mitigation measures specified in Negative Declaration IX would ensure that impacts associated with the project would be less than significant. According to the measures specified under "All Environmental Factors," a Petition to Modify (or "Application for Modification of") the CPCN must be filed to obtain approval for activities outside of existing ROWS.

To address the Commission's requirements for proposed off-ROW work, Level (3) prepared and submitted a Proponent's Environmental Assessment (PEA) on May 21, 1999, as part of its filing of an Application for Modification of its CPCN.

The May 21 submittal included environmental checklists for 31 vacant and largely undeveloped sites for the construction of In-Line Amplification Units (ILAs), Regeneration Units (3Rs), and Distribution Nodes (D-Nodes), as well as three Workarounds (fiber optic line re-routes). These checklists followed the format and criteria required for preliminary review under the California Environmental Quality Act (CEQA).

On June 15, 1999 Level (3) submitted an addendum to its PEA. The addendum included checklists for two additional vacant sites. The CPUC provided review comments on these two submittals on June 18 and June 28. These comments led Level (3) to reevaluate its off-ROW system needs due to potential



**Level3Communications  
InfrastructureProject**

Figure 1  
**Level 3 Communications, LLC  
California Statewide Network**  
*Aspen*  
EnvironmentalGroup

Source: PEA, 2000

environmental impacts. As a result, Level (3) reduced both the number of (off-ROW) project elements (sites) and the potential for environmental impacts associated with those selected for inclusion in the network. A revised PEA, which included CEQA checklists for 25 off-ROW project elements (22 facilities and three workarounds), was subsequently submitted to CPUC on October 1, 1999.

The CPUC conducted a preliminary review of Level (3)'s October 1 submittal and, on October 14, 1999, provided 12 "threshold comments" to which responses were needed before the October 1 submittal could be fully evaluated. On November 11, as part of Level (3)'s response to these threshold comments, five additional CEQA checklists (four facilities and one Workaround) were submitted to the CPUC, and five other October 1 off-ROW project elements were dropped. In addition, 12 on-ROW station facilities were identified which are not the subject of this supplemental CEQA review (for more information, please see Section 2.2.) Since the November 11 submittal, one additional facility (Escondido ILA) has been relocated to existing ROW, and the CEQA checklist for that site has been dropped. This change reduced the suite of off-ROW project elements for which CEQA checklists were required to 24 (20 facilities and four Workarounds). These 24 project elements were the subject of Level (3)'s January 4, 2000, Draft Final PEA.

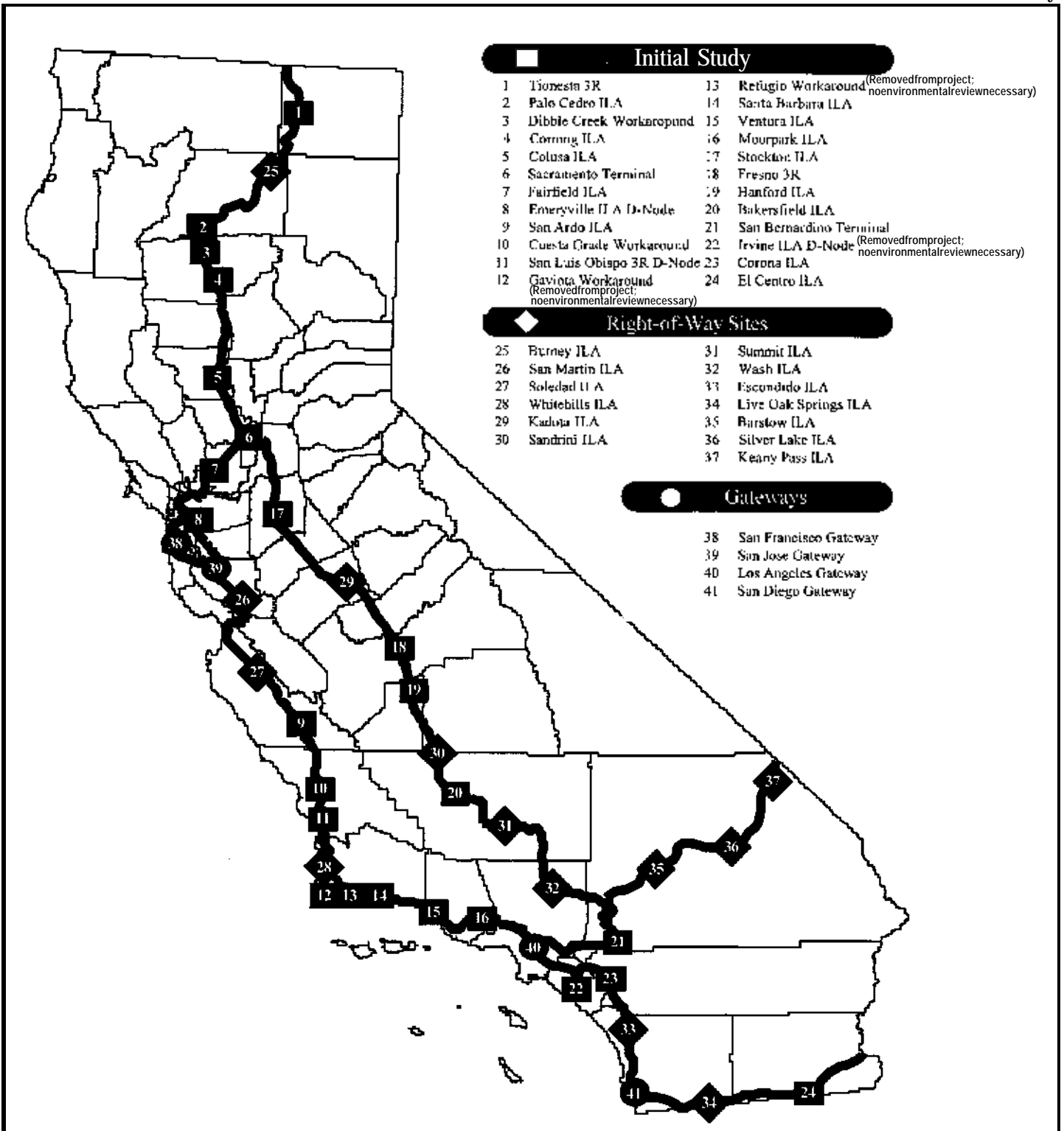
Subsequent to the January 4 submittal, Level (3) dropped the Irvine D-Node site from the network, and submitted a Final PEA on January 24, 2000. On March 15, 2000 (letter dated March 13, 2000), Level (3) informed the CPUC that two of the proposed off-ROW workarounds in Santa Barbara County (the Gaviota and Refugio workarounds, sites 12 and 13, respectively) had been rerouted. The reroutes allow placement of the fiber optic cable within the existing Union Pacific ROW. Consequently, these two sites have also been dropped from review; 21 project elements are now proposed for CPUC environmental review and approval, as follows:

- Nine Facilities within existing structures on developed sites
- Five Facilities on the existing foundations of demolished or removed structures on developed sites
- Two Facilities on vacant developed sites
- Three Facilities on disturbed undeveloped sites
- Two workarounds.

The locations of these elements are depicted regionally in Figure 2. Site-specific vicinity maps and plot plans for each element are provided in each of the Initial Studies provided in Appendix A of this document.

## **1.2 PURPOSE AND SCOPE OF THE INITIAL STUDIES**

As described above, Level (3) has submitted a Final PEA to accompany its Application for Modification to its CPCN. As specified in CPUC Rule 17. 1, the Final PEA was designed to enable the Commission to quickly focus on project impacts that may be of concern, and may also be used as



Level 3 Communications  
Infrastructure Project

Figure 2

Level 3 Communications, LLC  
California Network Elements

**Aspen**  
Environmental Group

an aid in preparing the Commission's Initial Study to evaluate potential environmental impacts, as required by CEQA. Initial Studies for each of the above-referenced sites have been prepared to determine if their construction or operation may have a significant effect on the environment. These checklists are provided as Appendix A of this document. In addition, a summary Initial Study checklist has been prepared to assess the overall effect of the proposed off-ROW work sites, including Mandatory Findings of Significance (see Section 4.3).

The Initial Study checklists presented in Appendix A of this document address the question of whether the CPUC should allow Level (3) to construct and operate the project's 21 off-ROW elements. Preparation of the Initial Study checklists contained herein was primarily based upon comprehensive, resource-specific technical reviews and evaluations of the checklists found in Appendix A of the Final PEA. In those instances where the information and/or conclusions contained in the Final PEA checklists were determined to be in need of either expansion or updating, additional data collection and analyses were conducted, and appropriate revisions made.

Effectively, the checklists of the Final PEA are the primary source documents for the Initial Study checklists presented in Appendix A. CEQA recognizes the use of source documents and encourages their incorporation into an environmental review document by reference (CEQA guidelines Section 15150). This allows the environmental review document to be kept to a manageable size, while still providing for accountability and accuracy.

Throughout the Initial Study checklists, citations to the Final PEA are made using the following format:

PEA, 2000, p. X-Z

In this format the "X" denotes a given project element's site number, and the Z denotes the page number of its corresponding Final PEA checklist. For example, the citation PEA, 2000, p. 4-8 references page 8 of the Final PEA checklist for the Corning ILA (site 4). A similar scheme is used for referencing figures and tables from the PEA, with "Z" denoting the figure or table number. New references exclusive to the Initial Study checklists contained herein are specifically identified.

The Final PEA can be accessed at:

<http://www.cpuc.ca.gov/divisions/energy/environmental/info/aspen/level3/level3.htm>

As specified by the CEQA Guidelines, should an Initial Study conclude that some or all of a proposed project will result in a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared to address these effects. However, if an Initial Study demonstrates that a proposed action will not create a significant environmental effect, a Negative Declaration or Mitigated Negative

Declaration may be prepared and circulated for public and agency review. This Determination may be found in Section 5 herein.

## 2. PROJECT DESCRIPTION

This section provides an overview of the Level 3 Communications Infrastructure Project and its elements. The Final PEA, dated January 24, 2000 is herein cross-referenced as an additional source of information for project detail.

### 2.1 INTRODUCTION

Level (3)'s stated purpose for this project is to provide businesses and communities in California with expanded telecommunications services, and specifically provide end users with competitive price choices, faster and more reliable data transmission, and increased diversification to enhance Internet access, phone calls, taxes, and other telecommunication needs.

Level (3)'s design seeks to provide sufficient capacity, bandwidth, and speed to meet rapidly expanding consumer demand. The project will provide Gigabit Ethernet as a standard option for directly connecting customer server and network equipment. Interconnection of the California network with Level (3)'s international network will build upon a combination of facilities-based and resold switches, interexchange points of presence, central offices, and gateways.

As previously described, Level (3) was granted authority by the CPUC in Decision 98-03-066 to provide telecommunications services in California. This original decision did not authorize construction of project elements outside existing utility ROW. Level (3) subsequently determined that such construction is required in some locations for Long-Haul cable placement or support facility development. Collectively, these off-ROW activities require supplemental environmental review and approval.

The types of off-ROW support facilities that are the subject of these Initial Study checklists are described below.

- In-Line Amplification Units (ILAs) - The technology used in Level (3)'s fiber optic network requires amplification of the light signal being transmitted through the fiber, approximately every 60 miles along the Long-Haul network. The proposed ILA units occupy approximately 3,000 square feet, with a total of approximately 5,000 square feet of total development at each site.
- Regeneration Units (3Rs) - A regeneration station is an integral part of a fiber network's operation. Regeneration is the process of re-shaping, re-timing, and re-modulating the optical signal. The resulting signal is filtered of noise and directed to the end destination along the fiber. The optical signal is converted to an electrical signal and then back to an optical signal through the 3R processing. Current technology limits the distance an optical signal can travel without going through a regeneration process to about 300 miles. The 3R station, which requires about 6,000 square feet of space, would be assembled at the site and contain equipment to regenerate the signals carried on the fiber optic network.

- Distribution Nodes (D-Nodes) - The Long-Haul fiber optic network is connected to local telecommunication systems through distribution nodes. A D-node facility size is about 20,000 square feet, subject to local building and zoning codes. The larger size of a node (compared to an ILA or 3R) allows the installation of additional hardware needed to connect the fiber optic network to local telecommunication systems. A particular D-Node will also perform the ILA or 3R function, depending on its location along the network.
- Terminals - A terminal, which typically marks the point where two segments of the running line come together, is designed to direct traffic (signals) to major distribution centers and elsewhere on the Level (3) network. These facilities are also designed to allow other telecommunication customers to co-locate within the facility. Depending on its location along the network, a terminal will also perform ILA, 3R, or D-Node functions.

In addition, two “Workarounds” have been proposed. These workarounds address fiber optic installation outside of the approved ROW in areas where space constraints or environmental resources prohibit installation within the approved ROW.

These project elements are necessary and sufficient to operate the system and meet existing and expected user demand. Any further construction or expansion of the network and associated support facilities is currently considered to be speculative due to the rapidly changing technology of the telecommunication industry, and is not the subject of this environmental review. The ultimate configuration of the project elements may vary because of site configuration, engineering constraints, or the presence of drainage concerns, natural resource concerns, wetlands, or cultural or historical resources. Because of their modular construction, huts can be added to ILA sites as service load increases and additional fiber optic cables are installed in unused ducts.

As currently proposed by Level (3), each ILA, 3R, D-node, and Terminal will have the signal amplification and emergency generator capabilities needed to service a maximum of four fiber optic cables. Each 3R will have regeneration capabilities required to service up to four cables, as will those D-Nodes and terminals that also serve a 3R function based on their location along the network. Level (3) states that four fiber optic cables are sufficient to meet the identified needs of Level (3) and its lessees.

The Level 3 Communications Infrastructure Project includes the installation of 12 fiber ducts that could potentially carry fiber optic lines in the future; however, it is currently unknown if the additional capacity will be utilized. The proponent has opted to include the additional fiber optic cable capacity in this manner so that future installation of such cables will not require ground disturbance along the conduit ROW, thus avoiding future earth-disturbing and associated activities. Additionally, the incremental cost of installing empty conduit now is relatively small in comparison to doing so in the future. Level (3) may utilize this capacity in the future or may lease the capacity to other carriers. At this time, however, Level (3) has not stated any definite plans to use the additional capacity. Level (3) has noted that rapid technological development has already significantly increased the information capacity of a single line and may render the additional capacity unnecessary. It has additionally been noted by Level (3) that: (1) technological advances in fiber optic technology will minimize both the need for and size of future ancillary equipment and facilities such that it would be speculative to plan

for them at this time; and, (2) the number and capacity of fiber optic cable systems being installed by other carriers makes the future market for additional fiber optic cables uncertain.

## 2.2 PROJECT LOCATION

As herein defined, a "location" is the general area or vicinity in which a network element is situated.

The locations of all of the 40 originally proposed elements supporting Level (3) Communications Infrastructure Project (including on-ROW stations) are provided in Figure 2 and Table 2-1. Three of these elements have been removed from the project's design. These elements are labeled as such in Figure 2 and Table 2-1, and are not included as part of this environmental review.

Of the 41 originally proposed network elements shown in Figure 2, 21 are located outside of ROW and not within existing telecommunications facilities. These 21 project elements include 19 station facilities and two Workarounds, which are addressed in detail in the site-specific Initial Study checklists found in Appendix A of this document. Thirteen (13) additional ILAs are located in existing utility ROW, and are briefly described in Appendix G of the Final PEA. The four Gateways will be co-located in existing telecommunications facilities and are also not within the scope of this supplemental environmental review.

Construction Workbooks are being developed to provide all CPUC-required information for these on-ROW ILAs to the construction. The Construction Action Lists (CALs) in the segment Line Books are also being updated to: (1) denote the locations of proposed on- and off-ROW facilities; (2) specify the permitting, monitoring, and mitigation requirements; and, (3) identify the need for CPUC approval prior to construction (e.g., the CAL inserts will be "gray" until approval is granted).

The "Map ID" numbers in Table 2-1 correspond to the identification numbers referenced in Figure 2. The project *off*-ROW elements are assigned MAP ID numbers 1-24, the on-ROW ILA sites are assigned MAP ID numbers 25-37, and the four Gateways are assigned MAP ID numbers 38-41. The right-hand column in Table-2-1 ("Initial Study Status") identifies the 21 project elements as "Included," the 13 on-ROW ILA sites as "Line Book," and the four Gateways as "Not Applicable." In Appendix A, the number for each project element corresponds with the MAP ID number and identification number Table 2-1. As referenced in Section 1.1, the Irvine D-Node site (site 22) and the Gaviota and Refugio workarounds (sites 12 and 13, respectively) have been dropped from this environmental review. Consequently, there are no checklists in this document for sites 12, 13 and 22. However, to provide consistency between the checklists contained in this document and those found in the Final PEA, the original PEA numbering system has been maintained.

The five types of network support facilities (i.e., ILAs, 3Rs, D-Nodes, Terminals, and Gateways) are positioned along the network to perform functions necessary to provide integrated telecommunications services throughout the State of California, and to link California users with users across the nationally and internationally. Workarounds are located adjacent to the running line ROW in areas where



engineering or environmental constraints required the running line to diverge from the existing utility ROW.

**Table 2-1 Long Haul Network Elements**

Map ID	Route	Project Element	County	Address	Site Description	Initial Study Status
1	Homestead to Sacramento (WP04)	Tionesta 3R	Modoc	County Road 97	Undeveloped Land	Included
25		Burney ILA	Shasta	McCloud River Railroad ROW	ROW	Line Book
2		Palo Cedro ILA	Shasta	22020 Palo Way	Building Demolition	Included
3		Dibble Creek Workaround	Tehama	Near Red Bluff	Workaround	Included
4		Corning ILA	Tehama	702 2 <sup>nd</sup> Street	Building Demolition	Included
5		Colusa ILA	Colusa	210 10 <sup>th</sup> Street	Building Demolition	Included
6	Sacramento to Oakland (WS01)	Sacramento Terminal	Yolo	1075 Triangle Court	Existing Building	Included
7		Fairfield ILA	Solano	106 Railroad Avenue	Existing Building	Included
8		Emeryville ILA D-Node	Alameda	5000 Hollis Street	Existing Building	Included
38	WS03	San Francisco Gateway	San Francisco	185 Berry Street	Existing Facility	Not Applicable
39	San Jose to San Luis Obispo (WS05)	San Jose Gateway	Santa Clara	1280 Kiefer Road	Existing Facility	Not Applicable
26		San Martin ILA	Santa Clara	Union Pacific Railroad ROW	ROW	Line Book
27		Soledad ILA	Monterey	Union Pacific Railroad ROW	ROW	Line Book
9		San Ardo ILA	Monterey	Cattlemen Road at Short Street	Undeveloped Land	Included
10	San Luis Obispo to Los Angeles (WS06)	Cuesta Grade Workaround	San Luis Obispo	North of San Luis Obispo	Workaround	Included
11		San Luis Obispo 3R D-Node	San Luis Obispo	3550 Broad Street	Existing Building	Included
28		Whitehills ILA	Santa Barbara	Union Pacific Railroad ROW	ROW	Line Book
12		Gaviota Workaround	Santa Barbara	<i>(Site Removed from Project Design)</i>	Workaround	Not Included
13		Refugio Workaround	Santa Barbara	<i>(Site Removed from Project Design)</i>	Workaround	Not Included
14		Santa Barbara ILA	Santa Barbara	122 Helena Avenue	Existing Building	Included
15		Ventura ILA	Ventura	1667 Walter Street	Existing Building	Included
16		Moorpark ILA	Ventura	5245 Kazuko Court	Existing Building	Included
40		Los Angeles Gateway	Los Angeles	818 W. 7 <sup>th</sup> Street	Existing Facility	Not Applicable
17	Sacramento to Los Angeles (WS04)	Stockton ILA	San Joaquin	2079 Miner Avenue	Existing Building	Included
29		Kadota ILA	Merced	Burlington Northern Santa Fe Railway ROW	ROW	Line Book
18		Fresno 3R	Fresno	249 West Napa Avenue	Existing Building	Included
19		Hanford ILA	Kings	11090 10 ½ Avenue	Building Demolition	Included
30		Sandrini ILA	Kern	Burlington Northern Santa Fe Railway ROW	ROW	Line Book
20		Bakersfield ILA	Kern	7731 DiMiller Drive	Building Demolition	Included
31		Summit ILA	Kern	Union Pacific Railroad ROW	ROW	Line Book
32		Wash ILA	Los Angeles	Union Pacific Railroad ROW	ROW	Line Book
23	Los Angeles to San Diego (WD06)	Irvine D-Node	Orange	<i>(Site Removed from Project Design)</i>	Existing Building	Not Included
23		Corona ILA	Riverside	13601 Temescal Canyon Road (Lot 14) / 26335 Lester Circle (Lot 13)	Developed Land	Included
33		Escondido ILA	San Diego	Southern California Regional Rail Authority (Metrolink RR)	ROW	Line Book
41	San Diego to Yuma (WD04)	San Diego Gateway	San Diego	8929 Aero Drive	Existing Facility	Not Applicable
34		Live Oak Springs ILA	San Diego	Mountain Empire Electric Cooperative	ROW	Line Book
24		El Centro ILA	Imperial	1198/1202 Industry Way	Developed Land	Included
21	San Bernardino to Las Vegas (WD08)	San Bernardino Terminal	San Bernardino	North Industrial Parkway	Undeveloped Land	Included
35		Barstow ILA	San Bernardino	Boulder Utility Corridor	ROW	Line Book
36		Silver Lake ILA	San Bernardino	Boulder Utility Corridor	ROW	Line Book
37		Keany Pass ILA	San Bernardino	Boulder Utility Corridor	ROW	Line Book

After traveling approximately 60 miles along the network, signals require amplification, a function performed by an ILA station. However, as the amplified signal travels along the fiber, it also becomes increasingly distorted due to splicing and imperfections in the fiber. After the fifth ILA in a series, the signal can no longer be amplified to maintain system standards. It must be re-generated, re-shaped, and re-timed at approximately 300-mile intervals, a function of a 3R station. A typical 3R facility also provides the signal amplification function of an ILA station. D-Nodes are required to distribute signal to customers. A D-Node and Terminal may also perform the ILA or 3R function depending on its relative location along the network. Similarly, Terminals may also incorporate D-Node capabilities as their position along the network may require. Thus, while an ILA *per se* may not exist at every 60-mile interval along the Long-Haul running line and a 3R *per se* may not exist at every 300-mile interval, their functions are accomplished at these intervals by other support facilities.

Table 2-2 provides a summary of characteristics for each of the 19 station facilities addressed in this environmental review. Information particularly important to assessing construction-related impacts includes the presence and usability of onsite buildings, the size of the area grading, and size of the primary structure. A detailed analysis of the potential impacts for each of the 19 station facilities and the two Workarounds is provided in the CEQA Initial Study checklists provided in Appendix A of this document.

## 2.3 CONSTRUCTION AND OPERATION OVERVIEW

Section 8, Description of Facility, in each Initial Study checklist provides a summary description of the construction and operation activities associated with the subject project element. Impacts at Workarounds are primarily restricted to construction, as operations involve only periodic inspection/maintenance activities. For the 19 project elements (non-Workaround sites), impacts associated with both facility construction and operation must be assessed.

### Construction Activities

Development of ILA, 3R, D-Node, and Terminal facilities may include some or all of the following, depending on the functions and characteristics of the particular site:

- Pre-construction surveys as required to mark environmentally sensitive resources for avoidance
- Site brush clearance and grubbing
- Building demolition and debris removal
- Grading
- Pouring of a foundation slab and driveway improvements
- Delivery of prefabricated building components
- Assembly of prefabricated structures or buildings
- Connection of the facility to the network (cable installation and hookup, see Workaround construction, following)
- Connection of utilities (electrical power, telephone, sewer and potable water)
- Installation of fencing
- Site finishing (e.g., landscape vegetation, architectural treatments).

**Table 2-2 Attributes of Each Project Facility Relevant to Impact Assessment.**

Non-Workaround Project Element	Proposed Location	Zoning Designation	Size of Parcel (acres)	Project Element Space Requirement (square feet)	Size of Existing Building(s) (square feet)	Demolition Status	Type/Status of Existing Fencing	Size of New Building (square feet)	Generator Capacity (kW and hp)	Generator Structure Size (w x l x h in feet)	Capacity of Fuel Tank (gallons)	Area of Graded or Disturbed Surfaces (sq ft)	Number of Staff	Solid Waste Generation (cubic yards)
Tionesta 3R	County Road 97	Industrial	1.70	11,000	No Building	N/A	No	4900 <sup>(4)</sup>	400kW/587 hp	11x29x12	1400	11,000	0	390
Palo Cedro ILA	22020 Palo Way	Community Comm.	0.53	5,000	4,520	Yes <sup>(3)</sup>	No	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	70
Corning ILA	702 2nd Street	Lt. Industrial	0.26	5,000	5,200	Yes	Chain Link	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	3,000	0	93
Colusa ILA	210 10th Street	Gen Comm	0.44	5,000	4,800	Yes	Chain Link	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	3,300	0	70
Sacramento Terminal	1075 Triangle Court	Lt. Industrial	1.48	17,300	51,000	No	No	N/A	2000kW/2836hp	13x38x14	4200	7,000 <sup>(6)</sup>	3	600
Fairfield ILA	106 Railroad Avenue	Comm. Services	0.68	5,000	15,750	No	10 ft combination	N/A	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	265
Emeryville ILA D-Node	5000 Hollis Street	Mixed Use	4.60	6,000	48,960	No	Chain Link	N/A	400kW/587hp	11x29x12	1400	320 <sup>(5)</sup>	0	200
San Ardo ILA	Cattleman Road at Short Street	Heavy Ind.	2.85	5,000	No Building	N/A	No	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	5,000	0	35
San Luis Obispo 3R D-Node	3550 Broad Street	Comm. Services	4.31	11,000	29,295	No	No	N/A	1750 kW/2498hp	13x38x14	3400	7,000 <sup>(6)</sup>	3	200
Santa Barbara ILA	122 Helena Avenue	Hotel/Related Commercial	0.39	5,000	15,900	No	No	N/A	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	120
Ventura ILA	1667 Walter Street	Manufacturing/Planned Development	1.01	5,000	15,346	No	Chain Link	N/A	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	314
Moorpark ILA	5245 Kazuko Court	Industrial Park	0.60	5,000	15,000	No	No	N/A	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	272
Stockton ILA	2079 Miner Avenue	Lt. Industrial	1.00	5,000	25,000	No	6 ft chain link	N/A	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	265
Fresno 3R	249 West Napa Avenue	Lt Ind/mixed Use	2.08	11,000	29,225	No	Chain Link	N/A	400kW/587 hp	11x29x12	1400	7,000 <sup>(6)</sup>	0	191
Hanford ILA	11090 10 1/2 Avenue	Service Comm.	2.37	5,000	22,000	Yes <sup>(3)</sup>	Chain Link	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	190
Bakersfield ILA	7731 DiMiller Drive	Med. Industrial	2.35	5,000	11,500	Yes <sup>(3)</sup>	Chain Link	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	300 <sup>(5)</sup>	0	375
San Bernardino Terminal	North Industrial Parkway	Heavy Industrial	10.00	40,000	No Building	N/A	No	20,000	2000kW/2836hp	13x38x14	4200	40,000	3	0
Corona ILA	13601 Temescal Canyon Road (Lot 14)/ 26335 Lester Circle (Lot 13)	Service Comm.	3.25	5,000	No Building	N/A	No	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	5,000	0	0
El Centro ILA	1198/1202 Industry Way	Gen. Manufacturing	2.19	5,000	No Building	N/A	No	2000 <sup>(2)</sup>	300kW/449 hp	12x24x10	1000	5,000	0	97

(1) Existing slab will be used

(2) Includes ILA huts (1,728 sq. ft.) plus generator (288 sq. ft.)

(3) Current owner will remove existing structures (two aluminum buildings).

(4) Includes 3R building (4512 sq. ft.) plus generator (348 sq. ft.).

(5) Installation of generator pad and shelter only.

(6) Installation of equipment yard to include generator and mechanical coolers.

Figures 3 and 4 of the project's Final PEA provide an artist's representation of a 4-hut ILA installation with generator shelter (sufficient to service four fiber optic cable fibers), and delivery of a single ILA hut to the construction site, respectively.

Off-site staging and parking will not be required at any of these facilities during either construction or operation phases.

Construction at Workarounds will involve the following:

- Pre-construction surveys to mark environmentally sensitive resources for avoidance
- Site brush clearance and grubbing
- Disturbing a section of earth, approximately 1 foot wide by 5 feet deep, by means of either plowing, trenching, or boring (maximum width of ground disturbance by vehicles is 20 feet) (see summary descriptions provided below)
- Inserting PVC innerducts within the trench while simultaneously backfilling the trench after the innerduct is installed
- Burying handhole structures to connect innerduct sections.

The following description of fiber optic construction methods for plowing, trenching and direction boring is from Appendix C of the Final PEA.

Direct burial cable plow technology uses a tracked bulldozer that is either pulling trailer-mounted cable reels or is fitted with a cable reel on the front end and a cable plow on the back end. In most areas, only one equipment pass through the area is necessary. The cable plow is a single, straight-shafted blade that opens a narrow trench about 12 inches wide and 5 feet deep. The innerduct is continually placed in the trench and as the plow moves ahead the trench closes in behind the plow. The plow leaves behind a small ridge of material approximately 12 inches above the original ground surface and a small open slot about 6 inches wide and 1 foot deep. As part of the cleanup process, the disturbed soil surface is restored (e.g., regraded to original slope) within two days and revegetated. In stable soils the machines leave a track in the vegetation similar to, but wider than, a road vehicle. In wet or soft conditions, this disturbance may be great enough to require more extensive grading and reseeded to restore the area.

A "spider" plow may be used when wet, soft or restricted areas are anticipated. The spider plow has been specially developed for these types of conditions and causes much less disturbance as it runs on oversize rubber tires and weighs less than a bulldozer. The plowing techniques are the same for the spider plow as for the bulldozer.

Open trench construction involves excavating a width of 12 inches and a cover depth of at least 42 inches. This type of construction is used in areas where soil and geologic conditions preclude the use of a cable plow. Although equipment may vary, it will include track hoes, rubber tire backhoes or chain trenchers. The innerduct is placed in the trench, and as the backhoe excavates ahead, excavated material is backfilled

into the trench. Restoration will be completed within two days and includes placement of select, compacted fill utilizing existing excavated material, provided the material is free from rock and debris. The surface will be regraded to conform to surrounding contours and restored as appropriate.

A directional bore will be used to the extent possible to minimize impacts to sensitive environmental areas such as streams, wetland, sensitive species, or cultural resources. Directional boring is a state-of-the-art technology for placing underground cable where a surface-operated drilling device is angled into the ground from the surface and directed to its destination using a radio-controlled mole that contains a cutter head. Personnel, directing the mole on the ground, control the depth and direction of excavation. A plastic or steel sleeve is left in the ground through which the innerduct is later installed. Surfaces will be restored to original or better condition, once the innerduct is installed. Using this method, the innerduct can be directed under or around an obstacle without having to work in the sensitive area. This method can also be used to cross highways, rivers, wetlands, railroads, pipelines, and city streets.

Bentonite clay is mixed with water and is used as a lubricant in the boring process. It is possible for this mixture to seep to the surface through fractures in the ground. If seepage occurs it is most likely to be near the bore entry point, where the drill head is shallow, but it can occur anywhere along the bore alignment. The bores will be monitored by onsite inspectors and if seepage is found, boring will cease and corrective action will be taken. Containment will be accomplished using certified weed-free straw bales, earthen berms, sandbags, or pumps. These containment measures can be used on dry land or in stream channels. If the mixtures reaches a stream or if it surfaces within the stream channel, certified weed-free straw bales or sandbags can be used to contain it so that the material can be pumped back to the bore site or into tanks.

On occasion, plowing, trenching and boring may not be possible because of the presence of rock or boulders. On these occasions, the work may be done using excavators. This may include the use of rock saws that cut a slot in the soil and/or rock. This approach requires excavation of a minimum of 18 inches below grade and 10 inches below the rock surface.

Table “X”-III-1 of each Initial Study checklist in Appendix A provides detailed quantitative and descriptive information on the construction and operation activities at each site, including the following:

- Equipment (e.g., graders, excavators, and water trucks) that will be used at the construction site. Included are the size [in gross horsepower (hp)] and number of units for each type of equipment, and the numbers of hours per day and days that each piece of equipment will operate
- Numbers of trips and one-way commuting distance (miles) that members of the construction crew will travel to the construction site
- Number of trips per day, total number of trips, and number of one-way miles traveled by material delivery vehicles (e.g., cement and gravel trucks)
- The amount of material (soil) that will be disturbed during cable placement operations at the proposed site.

Methods and specifications for construction of several categories of project elements are described in detail in Appendices C and D of the Final PEA. These construction techniques and standards have been designed to avoid or minimize potential environmental impacts. Technologically advanced equipment such as the "spider" plow (equipment with large, low-pressure tires,) and directional boring will be used whenever feasible. Section 2.5 describes the overall measures that will be implemented to avoid and minimize water quality impacts during construction. Appendix E of the Final PEA provides detail for these impact minimization measures.

Implementation of construction practices to minimize environmental impacts will be ensured by adoption, and subsequently monitoring, of the issue-specific environmental mitigation measures identified in the environmental review process. Site-specific mitigation measures recommended for construction are listed, by resource/issue area, in the Initial Study checklists provided in Appendix A.

The duration of construction for an ILA site is 30 to 45 working days, depending on the characteristics of the particular site and associated logistic considerations. The construction period for a 3R facility is approximately 24 weeks, while that for a D-Node or Terminal is approximately 28 weeks. Workaround construction will vary from several days to several weeks, depending on the length of the Workaround. Construction activities within an air basin will be sequenced, as necessary, to avoid significant air quality impacts, based on comparison of estimates' of district-total emissions to conservative thresholds (see Section III of the Appendix A checklists).

A precise construction start date and schedule cannot be determined until after approval of the proposed actions by the CPUC. However, Level (3) has targeted a construction completion date for both routes between Sacramento and Los Angeles by the end of the year 2000. Construction schedules are provided in Level (3)'s Quarterly Reports to CPUC, as well as in the segment Line Books.

### **Operation Activities**

The ILA, 3R, and D-node sites that perform ILA functions (i.e., ILA D-Nodes) will not be permanently staffed. Operational impacts will be associated with site visits for data logging and maintenance which will occur approximately once per week, and the weekly automated testing of emergency generators (which does not require a site visit). The 3R D-nodes (i.e., those D-Nodes that also perform the 3R function) and Terminals will be permanently staffed (three individuals each). Operational impacts at these sites will be associated with daily commutes, use of the facility, and automatic emergency generator testing.

Table "X"-III-1, Air Quality Calculations, of each Initial Study checklist provides detailed quantitative and descriptive information on the operational activities at each site, including the following:

- Size/gross horsepower of the standby generator and its duration of activity

- Number and distances of vehicular trips to the site associated with site operation, maintenance, and data logging.

Except for the periodic inspection visits, there are no operation activities associated with the Workarounds.

## **2.4 REQUIRED PERMITS AND APPROVALS**

Consistent with the environmental mitigation measures identified in Negative Declaration IX, all necessary local, state, or federal permits, and approvals will be obtained for each ILA, 3R, D-node, Terminal, and Workaround. These permits and approvals are discussed in each Initial Study checklist under Item 10 (Other Agencies Whose Approval Is Required), as well as under each of the resource-specific impact assessment categories.

## **2.5 APPLICANT-PROPOSED MITIGATION**

Level (3) has committed to avoiding or reducing to less-than-significant levels any potentially significant environmental impacts resulting from off-ROW work activities. This goal will be met through implementation of Level (3)'s Environmental Commitments (based on the Mitigation Measures in the Negative Declaration IX and other environmental reviews and approvals), Level (3)'s corporate policies on environmental protection and safety, and any additional requirements that CPUC may impose. These commitments and corporate policies are addressed following. Level (3) continues to file its Quarterly Reports as required by the CPCN, and will integrate the project elements into this reporting process once the CPCN is modified.

### **Environmental Commitments**

Level (3) has incorporated all of the mitigation measures specified in Negative Declaration IX, as well as additional appropriate measures, into the planning, design, construction, and operation of the project elements that are the subject of this environmental review. Therefore, all actions previously identified as mitigation measures for ROW network construction and operation are now part of Level (3)'s Environmental Commitments for off-ROW activities. These Environmental Commitments include:

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

Site-specific details regarding Level (3)'s Environmental Commitments are found in each of the Initial Study checklists provided in Appendix A. The site-specific actions proposed in these checklists are necessarily preliminary and subject to final agreement by authorizing agencies and permit conditions which may be imposed at the local level.



### **Level (3) Corporate Policies and Approach to Environmental Quality**

In addition to Level (3)'s Environmental Commitments, the project incorporates Level (3)'s corporate policies and procedures on environmental quality as standard measures in project design, construction, and operation.

Level (3) has issued an "Environmental/Cultural Resources Philosophy" statement that defines what Level (3) expects from its employees and contractors. The statement promotes employee and contractor awareness of the company's goal to comply with the conditions of its CPCN and permits and thus protect the long-term quality of the environment wherever it constructs. Native American monitors, archaeologists, endangered species specialists, and environmental inspectors currently provide oversight during Long-Haul construction, and are expected to do the same for off-ROW construction.

Level (3)'s multidisciplinary team of in-house environmental specialists communicates the company's commitment to compliance with the conditions of its CPCN and various permits, and ensures that all contractors are aware of the adverse impact that non-compliance could have on both the environment and the construction schedule.

Level (3)'s commitment to protecting the quality of the environment includes, but is not limited to:

- Utilizing a contractor experienced with California's environmental policies, laws, and regulations, as its construction contractor. The construction contractor then hired a national engineering firm with a strong presence in California to manage the acquisition of the needed permits by subcontractors
- Training the construction managers and crews and providing guidance to construction managers and crews via permit workbooks
- Employing a site selection process that emphasized environmental protection over cost, and was successful in siting all facilities on developed and/or disturbed properties
- Implementing state-of-the-art and costly "environmentally-friendly" construction methods to avoid or minimize impacts to sensitive or regulated areas. Such methods include, but are not limited to:
  - Boring under streams and sensitive resource areas instead of plowing through them
  - Employing "spider" plows that leave a smaller "footprint" in sensitive areas
  - Putting larger tires on vehicles to reduce soil disturbance and compaction
- Requiring construction contractors and subcontractors to define and implement very aggressive safety and environmental protection programs
- Employing experienced environmental inspectors for each construction segment who take the lead for their respective segment-specific environmental teams in ensuring compliance with the CPCN Decision and permit conditions
- Actively seeking opportunities to participate in "joint-build" opportunities in order to reduce costs and minimize environmental impacts.

### **3. ENVIRONMENTAL SETTING**

Section 9 of the Initial Study checklists, Surrounding Land Uses and Environmental Setting, provides a brief description of each site's physical attributes; each checklist additionally includes a site vicinity map for reference. Resource-specific descriptions of each site are provided in the "Setting" discussion that introduces each resource/issue area evaluated. In total, 16 resource/issue-specific categories are assessed in the checklists. Where appropriate, the resource-specific settings are supported by graphics. A broad summary of the resource-specific settings for the proposed off-ROW elements is provided in the master Initial Study checklist found in Section 4.3 of this document.

The 13 on-ROW ILA sites are briefly described in Appendix G of the Final PEA, including generic designs for the 3000- and 5000-square foot ILA facilities.

### **4. ENVIRONMENTAL IMPACT ASSESSMENT SUMMARY**

A detailed assessment of the potential impacts associated with each project element was conducted by addressing each of the 86 questions contained in the Initial Study checklist. A summary of all of the checklists is provided in the project's master checklist (Section 4.3). The impact assessment incorporates previously identified mitigation measures required by the CPUC Negative Declaration IX, Level (3)'s Environmental Commitments, which include the mitigation required by the Level (3) CPCN Decision (Appendix B of the Final PEA), and other mitigation measures considered prudent to minimize impacts to the maximum extent feasible.

#### **4.1 IMPACT ASSESSMENT METHODOLOGY**

##### **Initial Study**

Assessment of the potential impacts associated with the proposed actions was primarily based upon technical review and evaluation of the checklists presented in Appendix A of the Final PEA. In those instances where potential impacts were considered to be either (1) deficient, or (2) in need of additional mitigation, additional research and analysis was undertaken. Modifications to the checklists were subsequently made. Section 1.2 provides a guide as to how the Initial Study checklists found in Appendix A of this document relate to and cross-reference detail provided in the checklists of the Final PEA.

##### **PEA**

Assessment of project-related impacts presented in the Final PEA proceeded as a four-step process, as follows:

1. Preparation of field questionnaires
2. Implementation of site visits
3. Discipline-specific impact analyses
4. Cumulative impact assessment.

Each of these four steps in the assessment process is described below.

### **Preparation of Field Questionnaires**

To ensure that all information needed for impact assessment was acquired in an expeditious manner, field questionnaires were developed. Five such forms were developed, as follows: (1) General Agency Questionnaire, (2) General Field Questionnaire, (3) Cultural Questionnaire, (4) Biological Questionnaire, and (5) Hazards Questionnaire.

The general field and general agency questionnaires included information required to address all land use-related issues, as well as air quality, noise, water quality, and geologic resources.

To ensure the thoroughness of these questionnaires and their responsiveness to CPUC needs, a detailed reevaluation of the existing checklists was undertaken following receipt of CPUC comments on the May 2 and June 18 submittals (see Section 1.1). With Team members from all disciplines assembled, each existing checklist was compared to CPUC comments and amended, as appropriate, for completeness.

### **Site Visits**

Once the questionnaires were complete, a multidisciplinary team visited each site. Typically, each field team included a biologist, a land use planner, and a cultural resources specialist. These individuals evaluated the site, filled out the questionnaires, and in cases where the need was identified, specified additional types of expertise for which a follow-on site visit would be appropriate. The Team additionally took site photographs. The photos and field questionnaires were then evaluated in detail for a final determination regarding the need for additional site visits. The land use planner additionally visited local agency offices and acquire land use plans, parcel maps, and other pertinent background information.

### **Discipline-Specific Evaluation Methodologies**

While field efforts were underway, Level (3) engineers conducted preliminary design of the project elements and provided key information on design, construction, and operation parameters needed for the impact assessment. Once this information was developed, the basis for detailed, resource/issue-specific impact assessment was established. In the following paragraphs, the methodologies utilized for each resource/issue area impact assessment is summarized.

***Land Use, Aesthetics, Agricultural Resources, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation/Traffic, Utilities and Service Systems***

Following the field visits, completion of the field checklists, data acquisition, and follow-up telephone interviews with appropriate agency personnel, the information collected was analyzed to determine the overall environmental impacts of each project element per the specifications of the questions of the CEQA Initial Study checklist. Photographs taken during the site visit were particularly helpful in addressing aesthetic issues. Primary documents reviewed included city and county General Plans and Zoning Ordinances. Information available on websites, such as city and county population trends and distributions and the names of designated scenic highways were additionally used. Additional information, such as the location and capacity of solid waste landfills from cities and counties, was independently gathered to fill "gaps" in the database.

Each analyst determined the significance of project-related impacts using her/his judgement and experience with similar projects. The comments and opinions of city and county staff members were also weighed into the determination. Quantitative estimates of project contributions and limiting values were used as available (e.g., solid waste generation and landfill capacities).

***Air Quality/Noise***

The air quality and noise impact assessments were based on detailed identification and quantification of construction and operation activities and equipment. These data are summarized in tabular form in each checklist. The key information derived from the field visits included distances to public and sensitive receptors and environmental setting information relevant to identify ambient noise levels. To the maximum extent possible, air quality and noise assessments were integrated to assure consistency. Construction and operation impacts were assessed separately because activities were substantially different and typically subject to different regulations.

For construction and operation phases, the analytical sequence proceeded as follows:

- Review and summarize federal, state, and air district regulations, local noise regulations and ordinances, and the noise element of the county or city general plan
- Identify and describe relevant source activities and parameters
- Assemble emission factors and compute emissions
- Describe noise levels produced by source activities
- Describe project features that are designed to keep air quality and noise impacts below a level of significance
- Determine the resulting level of significance.

Proposed project design features that keep air quality and noise impacts below a level of significance at individual project elements include the following:

- Fugitive dust control measures
- Construction and operation emissions and noise would comply with local, state, and federal emission standards
- Construction scheduling would be coordinated with other petitioners in locales where activities could potentially cause considerably cumulative impacts
- If significant construction noise were expected, Level (3) would inform, at least two weeks in advance, surrounding property owners and occupants, particularly school districts, hospitals and residential neighborhoods, of the days when the most noise would occur.

Compliance with these actions would be documented in Level (3)'s quarterly report to the CPUC.

### ***Biological Resources***

Prior to conducting a site visit, the California Natural Diversity Database (CNDDDB) was searched for occurrence records of special status biological resources on the 7.5 minute USGS quadrangle map(s) where the site is located. Potential habitat for each of these species was evaluated during a site visit and their potential to occur is described in Table 5 of each checklist.

During the site visit, a biologist conducted a walk-over survey of the property for one to two hours. Notes and photographs were taken to document biological resources located on and adjacent to the site. Special attention was given to species identified during the CNDDDB search and protected or sensitive habitats. In addition to evaluating species and habitats on the site, consideration was given to the impact of the project on wildlife movement corridors. All biological features and photographic points were mapped onto a parcel map.

### ***Cultural Resources***

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

To respond to the Cultural Resources questions contained within the Final PEA's checklists, record searches were obtained from the appropriate information center of the California Historical Resources Inventory System. These searches had two objectives: (1) to determine whether previous archaeological investigations have been conducted in the project area; and, (2) to provide information on known historic sites or culturally sensitive areas on and in the vicinity of the proposed facility. The Information Center staff reviewed maps on file and provided maps showing locations of cultural resources within one mile of the parcel, and provided site records. The information centers sent a bibliography of survey reports and reports of other investigations for the one mile radius. The Information Centers also checked the Inventory of Historic Resources from the Office of Historic Preservation, which includes State Historic Landmarks and properties, listed or eligible for the

National Register of Historic Places, as well as properties evaluated, but not determined eligible. Other sources checked by each information center are listed in each checklist.

In addition, the proponent sent letters dated June 3, September 3, and October 22, 1999 to the Native American Heritage Commission (NAHC) requesting a search of the NAHC Sacred Lands file and identification of contact persons for follow-on contact/consultation for each of the facility sites (Mason, 1999a, 1999b; White, 1999). The responses, dated July 9, September 17, and November 9, 1999, indicated that the NAHC searches revealed no available site-specific information on Sacred Lands (McNulty, 1999a, 1999b, 1999c). The response letters cautioned that absence of information did not necessarily indicate the absence of cultural resources. A list of Native American contacts that might serve as sources of additional information was also provided. For each project element, Level (3) sent letters to all NAHC-identified Native American contacts for the particular county, notifying them of the Level (3) project activities and requesting information they might have on sacred lands. Any response indicating the possible presence of Sacred Lands will be followed up with a detailed, site-specific evaluation utilizing the expertise of the relevant Native American contacts.

For Cultural Resources Question (c), regarding paleontologic resources, a consulting paleontologist, Dr. E. Bruce Lander, obtained information on previously recorded fossil localities and the potential for specific formations underlying the project element parcels to yield fossils from the Invertebrate and Vertebrate Paleontology Sections of the Natural History Museum of Los Angeles County; the San Bernardino County Museum; the University of California, Riverside, Campus Museum; and the University of California, Berkeley, Museum of Paleontology. He also consulted the California Division of Mines and Geology Geologic Map Series and the Society of Vertebrate Paleontology Bulletin, as well as other sources specific to individual parcels cited in the checklists.

Photographs of parcels were taken by environmental planning staff and were reviewed by the Consulting Archaeologist, Dr. Roger D. Mason, to determine if structures that appeared to be more than 50 years old were present and to determine whether open ground (not paved or covered by gravel) was present. If structures that appeared to be more than 50 years old were present, they were evaluated for the California Register by architectural historians Richard Starzak, Gail Miller, and John Snyder. The results of the evaluations were provided in the Final PEA checklists as part of the response to cultural resources Question (a). Appropriate DPR 523 forms were filled out for evaluated structures. If open ground was present, a field survey was performed by qualified archaeologists. The results of the surveys are provided in the Final PEA's checklists as part of the response to cultural resources Question (b).

The determination of the level of impact was based on whether significant resources were known to be present on the proposed parcel, or whether there was only a potential to encounter such resources. If a known significant cultural resource was identified on the parcel, the level of impact would normally be assessed as "Less Than Significant With Mitigation Incorporation." However, if project design would result in avoidance or no significant effect on the known significant resource, the level of impact was

assessed as "No Impact. " If there were prehistoric or historic sites or isolated artifacts recorded near the parcel, or if historic structures were known near the parcel, there would be a potential for encountering subsurface prehistoric or historic resources during construction. In this case, the level of impact was assessed as "Less Than Significant" as mitigation monitoring during construction was proposed in these situations. For paleontology, the presence of fossils found elsewhere in formations identified as being under the parcel would suggest the potential for encountering similar fossils on the parcel. All potential paleontologic impacts were assessed as "Less Than Significant" because as paleontological mitigation monitoring during construction has been proposed.

### ***Geological Resources***

The geological resources assessment focused on examination of specific geologic hazards to people and/or structures associated with each of the proposed sites. The geologic hazards evaluated include: (1) Alquist-Priolo Earthquake Zones; (2) recently active faults; (3) potential ground failure; (4) landslide potential; (5) subsidence; (6) erosion; and (7) expansive soils. This evaluation was based on current available literature, proposed facility structural design parameters and intended use, and proposed and required mitigation.

### ***Hydrology and Water Quality***

The factors considered to evaluate the significance of an impact included site habitation, proximity to specifically designated recharge areas, potential for flooding from storm events or from a dam failure, amount of topographic relief, and potential for inundation by tsunami or seiche.

The primary references used to address each potential impact included County and City General Plans, floodplain maps from Vista Information Solutions, and inundation maps from the California Office of Emergency Services. If a site was located within a groundwater recharge area or within the area subject to inundation by a 100-year flood, dam failure, tsunami, seiche, or mudflow, the impact was determined to be less than significant because the facilities will be placed within an existing building and will not be permanently occupied. A "no impact" designation was assigned to those sites that were not located within a groundwater recharge area or within an area subject to inundation by a 100-year flood, dam failure, tsunami, seiche, or mudflow.

### ***Hazards and Hazardous Materials***

For questions relating to hazards and hazardous materials, a reconnaissance of the site was conducted and a record search was requested from Vista Information Solutions, Inc. During the site reconnaissance, a field questionnaire was completed and photographs of the project sites were taken by environmental planning staff. The field questionnaire and photographs were used to document factual information about the site and surrounding properties including conditions that might expose people or

structures in the area to a significant risk of loss, injury, or death from safety hazards or hazardous materials.

The Vista records search consisted of a "Site Assessment Plus Report" and a "NEPA (National Environmental Policy Act) Checklist" report. The "Site Assessment Plus Report" covered 18 federal and state government databases containing environmental information about properties in the vicinity of the project site including properties that transport, use, or dispose of hazardous materials, emit hazardous emissions, and handle acutely hazardous materials. The "NEPA Checklist" report covered 11 information sources that identified nearby properties containing historic landmarks, parks, wild and scenic rivers, wildlife preserves, areas of Native American significance, floodplains, wetlands, and endangered species.

The field questionnaires, photographs and record searches were compiled and reviewed to determine if the project site or the proposed activities would create a hazard to the public or the environment, including safety hazards for people residing or working in the project area.

#### **4.2 CUMULATIVE IMPACT ASSESSMENT METHODOLOGY**

In the context of CEQA, cumulative impacts are two or more environmental effects which, when considered together, are considerable or which compound or increase other environmental impacts. The scope of the cumulative impact assessment in the Initial Study checklists is premised on information provided in the Final PEA and is limited to those attributable to current and reasonably foreseeable future projects located in the vicinity of the proposed project elements. The results of the cumulative impact assessment are addressed in Section 8 of the Initial Study checklist for each site (found in Appendix A). Additionally, the scope of the cumulative impact analysis includes the requirements of the existing Negative Declaration IX for the Level 3 Communications Infrastructure Project network regarding construction within existing utility ROWS. As a result of this, Level (3) must coordinate with other carriers and consult with affected local agencies to minimize cumulative impacts. In addition, Level (3) must submit reports to CPUC prior to the beginning of each quarter that summarize construction projects anticipated in the next three months.

#### **4.3 IMPACT CONCLUSION SUMMARY**

This Summary Initial Study Checklist has been prepared to assess the overall effect of the proposed off-ROW work sites, including Mandatory Findings of Significance. *The level of impact checked in this Summary Checklist reflects the highest level of impact found for any of the 21 off-ROW project elements evaluated in this Initial Study.* A Summary Table of additional mitigation measures recommended for incorporation by Level (3) to reduce impacts to a non-significant level is provided at the end of this section (Table 4-1).



**I. AESTHETICS**

**Setting:**

The proposed project elements are located in a variety of environments, of which most can be described as urban landscapes comprised of built structures and features exhibiting industrial, commercial, and residential character. However, some sites are located within rural or transitioning landscapes with greater prominence of naturally-appearing features exhibiting harmonious compositions of forms, lines, and colors.

a) Would the project have a substantial adverse effect on a scenic vista?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input checked="" type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input type="checkbox"/>
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For those areas where proposed project elements are located within rural or transitioning landscapes, viewers are often provided panoramic views of open, flat terrain; rolling hills; and agricultural fields. Three sites: the San Bernardino Terminal, Corona ILA, and El Centro, will result in Less Than Significant Aesthetic Impacts due to the introduction of visual contrast associated with additional built structures or modification of the existing vegetation (in the case of the workaround). While noticeable, such changes would be relatively minor and would not result in significant aesthetic impacts. However, three sites, the Tionesta ILA (Site 1), San Ardo ILA (Site 9), and Cuesta Grade Workaround (Site 10), could result in significant aesthetic impacts associated with the introduction of inconsistent industrial forms and lines, and/or visually contrasting modifications of existing vegetation. In these cases, mitigation measures are recommended to reduce the aesthetic impact to a less than significant level (see Table 4-1).

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input checked="" type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input type="checkbox"/>
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Most of the proposed project elements are not located on, or in close proximity to, scenic resources such as trees or rock outcroppings, nor are they visible from any designated scenic highway or roadway. A few sites are visible from state-designated (or eligible) scenic highways, however views would be brief. The Cuesta Grade workaround, visible from Highway 101 (designated “Eligible” for state scenic highway designation), poses the possibility that without proper revegetation and erosion control practices on the steeper portions of the route, erosion of disturbed soils could occur, resulting in visible land scars. Should those circumstances occur, a significant visual impact could result, for which mitigation is recommended (see Table 4-1).

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input checked="" type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input type="checkbox"/>
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Some of the proposed project elements, as referenced above (a), will noticeably change the existing visual character of the subject site. These changes, however, are considered minor and can be mitigated to a level of less than significant (see Table 4-1).

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
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The majority of sites involve the installation of outside lights at the entrance of each structure. These lights would be comparable to a small porch light and in most cases, would not substantially increase a given site’s light or glare or affect existing day or nighttime views. For the Tionesta 3R and San Ardo ILA sites, the relative lack of exterior lighting in the immediate vicinity of the sites has the potential to create nighttime glare if not properly controlled, and mitigation is recommended (see Table 4-1).

**II. AGRICULTURAL RESOURCES**

**Setting:**

The proposed project elements are located primarily within urban environments. Although a few sites are in rural areas, none of these sites are located on lands currently used for agriculture, or identified as having properties or designations indicating significant agricultural value. It is noted, however, that the Tionesta 3R site (Site 1), has not yet been given Modoc County (County) General Plan or Zoning designations. This issue is addressed under II (b), below.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project elements would not convert or otherwise impact any lands designated Prime Farmland or Farmland of Statewide importance as defined by the Farmland Mapping and Monitoring Program of the California Resources Agency.

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
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Currently, the property associated with the Tionesta 3R Site (Site 1) does not have either a Modoc County adopted General Plan Land Use designation, or a Zoning designation. The circumstances leading to this situation are summarized in Initial Study Section 1-IX, Land Use Planning, for the Tionesta 3R facility. Should the County adopt either a General Plan or Zoning designation for the subject property that is agricultural in nature, a potentially significant policy conflict could occur. To mitigate the potentially significant impact to a level of less than significant, the following mitigation is recommended:

**Additional Mitigation Measure 1-IX-1:** Prior to the start of any construction-related activity, Level (3) shall ensure that the County has adopted General Plan Land Use and Zoning designations for the subject parcels, and that the proposed 3R facility fully conforms with these designations. Documentation of compliance with this measure shall be submitted to the assigned project Environmental Monitor at least two business days prior to construction.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The majority of proposed project facilities are located within urban/developed areas; none of them involve the conversion of existing farmland to a non-agricultural use.

### III. AIR QUALITY

**Setting:**

The elements of the proposed project are within numerous air basins throughout California. Many of the project locations are in areas that are designated as “nonattainment” for state and federal ozone and PM10 standards. The project elements are primarily in industrial and mixed land use areas near the Level (3) Network right-of-way, although several are in proximity to residential receptors.

a)	Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For the Santa Barbara ILA, although the Applicant proposed dust control mitigation measures, the Santa Barbara Air Pollution Control District requires more stringent fugitive dust measures and ozone precursor measures. Therefore, implementation of additional mitigation measures (see Table 4-1) are recommended to reduce potential impacts at the Santa Barbara ILA site to less than significant. Impacts associated with the rest of the sites are less than significant due to a limited construction period and area: most of the site construction periods are only about two months long and construction areas are usually under an acre.

A few of the project elements would have a staff of three part-time employees. However, the majority of the sites would be un-staffed and only require one trip per week for maintenance and inspection purposes. The emergency generators associated with the sites (not including Workarounds) would generate emissions; however, these emergency generators are exempt from emissions standards and permit requirements because they would only operate for approximately one half hour per week. A reasonable additional measure is recommended to help to ensure that the generation of ozone precursors during generation testing at all sites is minimized:

**Additional Mitigation Measure III-1:** In order to minimize the generation of ozone precursors during the most sensitive times of the day, testing of the emergency generators at the Terminal, D-Node, 3R and ILA sites will be scheduled to occur between 3:00 and 7:00 p.m.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As discussed in greater detail under item a), given the small scale of the construction and its temporary nature, project construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

With regard to operations, emissions from testing and maintaining the emergency generators at the Terminal, D-Node, 3R and ILA sites are exempt from numerical threshold requirements, due to compliance with State Best Available Control Technology requirements, and therefore are considered to be less than significant. As in item a), a reasonable additional measure is recommended to help to ensure that the generation of ozone precursors during generation testing at all sites is minimized:

**Additional Mitigation Measure III-1:** In order to minimize the generation of ozone precursors during the most sensitive times of the day, testing of the emergency generators at the Terminal, D-Node, 3R and ILA sites will be scheduled to occur between 3:00 and 7:00 p.m.

c)	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment 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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Potential cumulative construction emissions were analyzed for the possibility of simultaneous construction of sites within the same air basin, using the same thresholds used to evaluate emissions from the individual project sites. Ventura County was the only air basin where the parallel construction of sites could produce cumulatively significant air quality impacts, and the Applicant has therefore committed to limiting construction to one Ventura County site per day (Ventura or Moorpark ILA) to avoid significant impacts.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Sensitive receptors are defined as facilities that house children, the elderly, and ill members of the population, such as schools, day care centers, hospitals, retirement homes, hospices and residences. The location of any such sensitive receptors in the vicinity of any of the project elements was identified and evaluated for significant impact. As noted in the “Setting” for this issue area, the project elements are primarily in industrial and mixed land use areas near the Level (3) Network right-of-way, although several are in proximity to residential receptors.

In all cases, project construction will be buffered by a larger site area around the actual construction site, and access to the construction site is sufficient to avoid significant impacts to sensitive receptors. The measures already committed to by the Applicant to avoid and reduce emissions [see also items a), b) and c)] will also avoid and reduce the exposure of sensitive receptors to substantial pollutant concentrations.

During the operational phase of the project, emergency generators at the Terminal, D-Node, 3R and ILA sites will produce emissions during weekly, 30-minute testing and power outages. The small magnitude of these emissions as well as the intermittent nature of generator operation and the buffering

of this equipment by a larger facility site will ensure that any exposure of sensitive receptors to pollutants is minimal.

e) Would the project create objectionable odors affecting a substantial number of people?	Potentially Significant Impact	Less than Significant With Mitigation Incorporation	Less than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

None of the project elements would create objectionable odors.

#### IV. BIOLOGICAL RESOURCES

##### Setting:

In general, the subject properties are disturbed and developed; typically, they are characterized by landscaped trees, graded terrain, an overall lack of native habitat, the involvement of industrial facilities, and the presence of buildings and parking lots, dirt lots and disturbed fields. Some of the areas have jurisdictional drainages, ranging from ephemeral to perennial, or associated wetland and riparian habitats. Overall, however, the conditions for supporting biological resources on the project sites are poor.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A current list of potential sensitive species was generated for each of the 21 sites based on a search of the appropriate United States Geological Survey (USGS) quadrangles using the California Natural Diversity Database (California Department of Fish and Game, March 2000). Additional information was added from either specific knowledge of the areas, or in some cases by onsite assessments. Species that potentially could occur on each of the project sites were listed in a table compiled for each site. In most cases, a listed species is highly unlikely to inhabit any area within 500 meters of any of the sites due to local disturbance and insufficient habitat. In all site vicinities, adoption of avoidance measures have been adopted and will ensure less than significant disturbance to any sensitive biological resources.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Some of the sites have drainages with associated wetland and/or riparian areas within the project element's boundaries. In all of these cases, the drainages and associated sensitive habitat will be avoided by directional boring. Where applicable, the bore will be defined by a 100-meter buffer extending out from the edge of riparian vegetation. Continuing consultation with the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, and the California Department of Fish and Game will occur where appropriate to establish suitable vehicle streambed crossing methodology and resolve additional environmental commitments. Two out of 21 sites had an evaluation of less than significant in this category: Cuesta Grade Workaround (Site 10) and Dibble Creek Workaround (Site

3). The construction of the Sacramento Terminal (Site 6) will include directional boring to avoid possible raptor habitat which was evaluated as less than significant. The remainder of the sites were evaluated as no impact.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Only one out of 21 sites had an evaluation of less than significant for this category: the Dibble Creek Workaround (Site 3). All of the other sites were evaluated as no impact. For the sites with potential effects to wetlands, impacts to the wetlands and their associated riparian and aquatic habitats will be avoided by directional boring under the drainage. Additional construction techniques to prevent impacts will be used (including erosion control devices and a 100-foot setback zone from the edge of the riparian habitat for all construction activities where needed). Biological monitors will be present during any construction to ensure that the boring, setbacks, and erosion control devices are implemented properly. As the majority of sites do not include areas of potential wetlands on or adjacent to the sites, no impacts to wetlands are expected to occur as a result of project construction or operation.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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There are four out of 21 sites where it is expected that proposed activities might interfere with the movement of any native resident or migratory fish or wildlife species, or impede the use of native wildlife nursery sites. These six sites had an impact evaluation of less than significant.

The four sites have the following conditions for corridor or nursery usage: Bakersfield ILA (Site 20) does provide nursery sites for burrowing owls. The vicinity also provides potential den sites for the endangered San Joaquin kit fox (PEA, 2000, page 1-2). The Cuesta Grade Workaround (Site 10) is likely to function as a terrestrial wildlife corridor because of its unobstructed connection to native habitat. The site may also provide nursery habitat for native upland wildlife species (PEA, 2000, page 10-12). The Sacramento Terminal site (Site 6) and vicinity are characterized by heavy development, so it is unlikely, though possible, that the area is a part of any wildlife corridor (PEA, 2000, page 6-18). At the Tionesta ILA (Site 1), the surrounding National Forest lands provide ample wildlife movement corridors, but any restriction to wildlife movement would not be distinguishable from that caused by the rock operation at the site currently (PEA, 2000, page 1-12). Overall, the lack of natural habitat elements within the proposed site and cable access routes make it highly unlikely that Tionesta ILA could provide any component of a migratory wildlife corridor or native wildlife nursery.

Site-specific environmental commitments for these sites will ensure the avoidance of activities that could create impacts; consequently, a less than significant disturbance would be expected. The other seventeen proposed sites were evaluated as having no impact in this category.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Only one out of 21 sites had an evaluation of less than significant for this category. The other sites were evaluated as no impact. The Sacramento Terminal site (Site 6) was evaluated to be less than significant in this category due to the presence of a row of oak trees along the southern bounds of the property, for which the Applicant has committed to contacting the West Sacramento Planning Department prior to any disturbance to these trees. With all the other sites, there is no potential to conflict with local ordinances protecting biological resources. There are no applicable policies or ordinances protecting biological resources on these other sites.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

One out of the 21 sites had an evaluation of less than significant for this category. The other sites were evaluated as no impact. The Bakersfield ILA (Site 20) was the one exception, because Bakersfield is included in the Bakersfield Metropolitan Habitat Conservation Plan (HCP). This HCP requires the payment of fees for development within the metropolitan area as a “mitigation bank.” There are no such plans in effect for biological resources at the other sites. Therefore, the proposed project would not conflict at the other twenty sites with the provisions of any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans since no such plans exist for the other site vicinities.

**V. CULTURAL RESOURCES**

**Setting:**

The majority of proposed project elements are located in developed having previously disturbed soils, and will have no impact on cultural resources. Three sites are located in areas where historical archaeological resources may be affected by project-related activities.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Construction at of the Santa Barbara ILA has the potential to affect a Spanish Colonial Revival style warehouse, which appears to be eligible for both the National Register of Historic Places and the California Register of Historical Resources. The proposed interior remodeling of the building will not compromise the eligibility of the resource if the mitigative actions committed to by the Applicant are implemented to reduce project effects to a less than significant level.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Dibble Creek Workaround has the potential to affect prehistoric archaeological resources that also appear to have Native American burials present. The implementation of the proposed mitigative actions will reduce project effects to a less than significant level.

Construction at Site 5 (Colusa ILA) has the potential to affect historic archaeological resources from the early American Period. The implementation of the Applicant’s proposed mitigative actions will reduce project effects to a less than significant level.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Construction activities associated with the proposed project elements will have a less than significant impact to no impact on paleontological resources, with the implementation of the Applicant’s proposed mitigation actions.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The CHRIS records search and field survey inferred the presence of prehistoric Native American burials at the Dibble Creek Workaround. The implementation of the protocols in the *Level 3 Long-Haul Fiber Optics Project Cultural Resources Procedures* (PBNS, 1999, pp. 25-39) will reduce project effects to a less than significant level.

The remaining project locations will have no impact on human remains based on a review of archival data and a field review. No further management is required. However, if suspected human remains are encountered during construction, the implementation of the protocols in the *Level 3 Long-Haul Fiber Optics Project Cultural Resources Procedures* (PBNS, 1999, pp. 25-39) will reduce project effects to a less than significant effect.

## VI. GEOLOGY AND SOILS

### Setting:

California's remarkable geology is the result of volcanic and tectonic activity. Its majestic mountains were shaped by glaciers during the ice ages as well as by wind and rain. The scenic coastline of California is continually shaped by the pounding waves of the Pacific Ocean.

The California Department of Conservation oversees the state's geology, ranging from mining and mineral extraction to geologic hazards posed by earthquakes and landslides. The state's geological survey, begun in 1880, is one of the oldest in the United States. It tracks the availability of the state's mineral resources -- California typically produces more than \$2 billion worth -- and generates data on the impact geologic hazards have on the safety and economic well-being of Californians. The Department's seismic mapping program assists local governments in land-use planning, and its Strong-Motion Instrumentation Program (SMIP) is a valuable tool in creating earthquake resistant structures.

None of the proposed project elements are located within an Alquist-Priolo earthquake fault zone, although several are located in the general vicinity of active and/or historic faults, given the endemic nature of such faulting throughout California. These locations are the San Luis Obispo, Cuesta Grade,



Ventura, Moorpark, Corona, San Bernardino and El Centro, which may experience moderate to severe magnitude groundshaking from fault activity in the general area. Similarly, none of the proposed project elements are located within a liquefaction, landslide or subsidence hazard area, although there is moderate potential for landslide at Cuesta Grade (workaround for underground fiber) and a high potential at the Ventura ILA location.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic-related groundshaking?				
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides?				

Any potential seismic hazards associated with the proposed facilities would be minimized to less than significant by compliance with all state and local seismic building codes, including the Uniform Building Code Seismic Standards for the relevant zone. Also, since most of the facilities will not be staffed, there would be little exposure of people to risk of injury or death associated with seismic events.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project elements are located in relatively flat areas, designated as having low-to-moderate erosion activity. The Applicant's commitment to use of Best Management Practices, and otherwise having to comply with federal, state and local requirements associated with avoiding or reducing soil erosion, are expected to be successful in these locations.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project sites are relatively flat and typically not located in an area with unstable soil or geologic units, although there is moderate potential for landslide at Cuesta Grade (workaround for underground fiber) and a high potential at the Ventura ILA location. The Applicant's commitment to compliance with state and local building codes will minimize potential hazards and risks.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Several of the proposed project elements would be located where there are highly expansive soils. However, The Applicant's commitment to compliance with state and local building codes will minimize potential hazards and risks.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The majority of the proposed project elements will not be staffed/occupied and will not generate wastewater. For the few sites which will, the soils at these sites have been demonstrated by previous uses to be capable of supporting wastewater disposal systems.

**VII. HAZARDS AND HAZARDOUS MATERIALS**

**Setting:**

A review of a database of regulatory agency-recognized hazardous waste sites has demonstrated that none of the project elements are located on or near potentially contaminated sites. Site reconnaissance has revealed that generally no schools are located within one-quarter mile of project element sites, except for the Hanford, Salinas River Valley and Fairfield sites. Similarly, project element sites are typically not in the vicinity of an airport, except for the Corning, San Luis Obispo, Fresno, and Hanford sites. In each of these sites, an airport is located within two miles of the respective element site; however, with the exception of the San Luis Obispo site, the project element sites are not in an area covered by an Airport Land Use Plan. The San Luis Obispo site is located within Area 6 of the San Luis Obispo Airport Land Use Plan (PEA, 2000, p.11-27)

At all project element sites, fuel for the standby generator would be stored in an aboveground storage tank onsite.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Hazardous materials would be stored and handled by the proponent on-site, in compliance with existing federal, state, and local regulations.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Leak monitoring and spill containment features planned for the on-site, aboveground fuel storage tank will 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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Three of the 21 project element sites are located within the vicinity of an existing school. The Farifield ILA site is located 0.2 miles northwest of a daycare center; the San Ardo ILA site is located one-quarter mile from the San Ardo Union School; and the Hanford ILA site is located one-quarter mile from the Lincoln Elementary School. In these cases, proper handling and storage of hazardous materials, and restricted access to hazardous materials, would reduce the risk of exposure. No other sites are located within one-quarter mile of an existing or proposed school.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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None of the project element sites are included on a list of regulatory agency hazardous materials sites (Vista, 1999). However, a site visit conducted for the Level 3 PEA identified two potential sources of contamination within and adjacent to the San Ardo ILA. Localized pockets of contamination may be encountered near this site, and will be adequately addressed by the actions proposed by the Applicant to avoid or reduce potential hazards to the public or the environment.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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Three of the project element sites – Hanford, San Luis Obispo, and Corning – are located within the vicinity of an airport. None of the project element sites, including these, are located in an area subject to an airport land use plan. The potential risk to these three sites is further reduced by the fact that they are not staffed, but only visited intermittently.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The only site located in the vicinity of a private airstrip is the El Centro site. The Douthitt Strip is located one-half mile north of the project site. The east-west runway alignment and the fact that the site

would not be permanently staffed reduces any safety hazard in the project area.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Construction and operation of the proposed project elements 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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

None of the project element locations are likely to be subject to wildland fire.

**VIII. HYDROLOGY AND WATER QUALITY**

**Setting:**

Typically, project-related activities involve construction of a facility either within an existing building or on an existing building pad. In these cases, little or no impact to the hydrology and water quality characteristics of the sites would be expected. Throughout the project, trenching and burial of utility lines are required. At some locations, these activities will cross jurisdictional waters of the U.S. In addition, at a few locations, grading and paving of the ground surface is required. At some of the sites, proposed activities will occur within 100-year floodplain limits. However, throughout the project, site locations and construction practices are expected to reduce impacts to hydrology and water quality to the less than significant level.

Applicant-proposed mitigation within jurisdictional wetlands will be avoided by directional boring. The boring will be approximately 12-inches in diameter, and will be backfilled with bentonite slurry. The bentonite slurry will seal the boring and will prevent the boring acting as a conduit for drainage of these drainage and wetland area. Details on use of bentonite slurry in directional boring and its past performance in similar situations have been provided (PEA, 2000, Appendix C).

Applicant-proposed mitigation additionally includes development of a contingency plan for non-roadway bores that would result in lower impacts for hydrologic resources. This policy is currently under review by the CPUC and other regulatory agencies.

Applicant-proposed mitigation includes actions to ensure that hydrology/water quality impacts are minimized during construction and operation of this site. These actions will be applied as appropriate. Details regarding these actions have been provided (PEA, 2000, Appendix E). These actions include:

- 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.

Applicant-proposed mitigation additionally ensure that a Notification of Intent (NOI) will be submitted to the applicable RWQCB and the State Water Resources Control Board for construction of any given 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.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Throughout the project, 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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

At the one site where groundwater extraction is proposed, the small rate of extraction is expected to have only minimal effect on aquifer volume or groundwater levels. At most sites, the net impermeable area will not be increased. At sites where concrete pads are required, the area of coverage is judged small enough to have a less than significant effect on groundwater recharge.

c)	Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed activity will slightly affect the drainage pattern on a few of the sites, but in no case will the course of a stream or river be altered. Site-specific grading plans, to be reviewed and approved by the local regulating authorities, will be prepared at the few sites requiring more than nominal grading. Impacts to on- or off-site erosion and siltation characteristics are expected to be less than significant.

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

The proposed activity will slightly affect the drainage pattern on a few of the sites, but in no case will the course of a stream or river be altered. Site-specific grading plans, to be reviewed and approved by

the local regulating authorities, will be prepared at the few sites requiring more than nominal grading. Impacts to on- or of-site flooding characteristics are expected to be less than significant.

e)	Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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At most sites, the runoff characteristics would not be affected by the proposed project. In the few sites where additional impermeable areas are proposed to be constructed, the relatively small size of the proposed construction would indicate that substantial change to the runoff characteristics on-or off-site is not likely. Runoff control structures, to be reviewed and approved by local regulating authorities, are to be incorporated where required prior to receipt of the building permit.

f)	Would the project otherwise substantially degrade water quality?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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None of the proposed project elements involve the placement of housing within a 100-year flood plain.

h)	Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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At most sites, the project will not be located within the 100-year floodplain. At sites where the project is to be located within the 100-year floodplain, the activity either does not involve aboveground structures, or the facility is to be located within or replace an existing structure, so the project will not result in a significant change to the existing situation. The project design is to incorporate all flood-protection measures deemed necessary for each site by the local authorities, taking into consideration the type of use and risk level at the respective location.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Loss, injury or death due to flooding is possible at several of the project sites. Dam and/or levees protect some of the sites, and these structures could potentially fail. However, entire communities are present in the vicinity of these structures, which would also be impacted in the event of failure. It may be reasonably assumed that these structures have been constructed with the normal standard of care

associated with major water resources facilities, and that the risk of failure is small. In the event of structure failure, personnel at the affected project site are expected to comply with appropriate county or city evacuation plans.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Inundation due to seiche, tsunami or mudflow is possible at several of the project sites. However, in each case, the likelihood of occurrence is judged to be small. In addition, the sites with the highest potential of being affected will not be permanently staffed. Any risk to people or structures would be present only during project construction and maintenance, and is therefore considered less than significant.

**IX. LAND USE PLANNING**

**Setting:**

The proposed project is located primarily within land use settings comprised of compatible industrial, commercial, and infrastructure uses. None of the 21 sites are expected to conflict with adjacent or local land uses.

a)	Would the project physically divide an established community?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The majority of proposed project elements involve only the re-use of existing structures or the construction of relatively small structures. None of the proposed elements are large enough to physically divide an established community.

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

One site, the Tionesta 3R site (Site 1) has the potential to conflict with Modoc County land use policy. Currently, the property associated with this facility does not have either a County adopted General Plan Land Use designation, or a Zoning designation. The circumstances leading to this situation are summarized in Initial Study Section 1-IX, Land Use Planning, for the Tionesta 3R site. Should the County adopt a General Plan and Zoning designations for the subject property that allow for the construction and operation of facilities such as the one proposed, no conflicts will occur. However, should the property be zoned/designated for a current or planned use that precludes uses such as the proposed 3R facility, a potentially significant impact could result. To mitigate the potentially significant impact to a level of less than significant, the following mitigation is recommended:

**Additional Mitigation Measure 1-IX-1:** Prior to the start of any construction-related activity, Level (3) shall ensure that the County has adopted General Plan Land Use and Zoning designations for the

subject property, and that the proposed 3R facility fully conforms with these designations. Documentation of compliance with this measure shall be submitted to the assigned project Environmental Monitor at least two business days prior to construction.

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
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Less than Significant with Mitigation Incorporation. As referenced above, the property associated with the Tionesa 3R facility does not currently have adopted General Plan Land Use or Zoning designations. As such, any County-adopted Habitat Conservation or Natural Community Conservation Plans would not be applicable. If the County adopts General Plan Land Use and Zoning designations for these parcels that would trigger implementation of such a Plan, a potentially significant impact could occur. To mitigate the potentially significant impacts to a level of less than significant, Mitigation Measure 1-IX-1 is also recommended.

**X. MINERAL RESOURCES**

**Setting and Impact Analysis:**

California has a wealth of mineral resources, including the rich soil of the Central Valley, the gold of the Sierra, and oil off the coast and in various locations across the state. The California Department of Conservation administers the Surface Mining and Reclamation Act (SMARA) to ensure environmental protection and reclamation of mined land, at the same time assisting cities, counties, state agencies and mine operators in their reclamation planning.

Typically, the proposed project elements are not located in areas designated by the State or county for mineral resources. In the few site locations where there are known mineral resources in the area (primarily sand and gravel extraction), the proposed project elements are in developed locations not likely to be mined.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**XI. NOISE**

**Setting:**

The environment surrounding the project element sites is varied. The surrounding lands include agricultural uses, mixed uses, commercial and industrial uses. None of the project element sites however, are located in residential neighborhoods.



Most jurisdictions enforce local County or City Noise Ordinances. These are varied, but generally limit the hours of construction and long-term operational noise.

a)	Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Noise impacts will generally be less-than-significant. However, at the San Ardo and Hanford sites, mitigation is required to reduce noise impacts to a-less-than significant level (see Table 4-1).

b)	Would the proposal result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Project construction would not generate excessive ground borne noise or vibration. The low level of groundborne vibration and noise generated during construction will be short term in nature, and generally not extend more than a few feet from the work area.

With regard to operations, the 300kW generator would be the only potential source of excessive groundborne noise of vibration from the site operations. The generator will be mounted on rubber isolators that effectively reduce ground borne vibration by up to 95%. Potential impacts associated with groundborne noise and vibrations are therefore less than significant.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Temporary increases in ambient noise levels would occur during the construction period. However, because the construction period is only projected to last for approximately two months, potential impacts associated with the temporary increase in ambient noise levels are considered to be less than significant.

Weekly testing of the emergency generator for periods of approximately 30 minutes, operation of the emergency generator during power outages, and maintenance activities would generate operational noise. This periodic noise would not be a substantial increase in ambient noise levels because of the

character of adjacent land uses and because of the distance between the noise source and the nearest receptors.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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The San Luis Obispo project element falls within the San Luis Obispo Airport Land Use Plan. It is the only site that is subject to such plans. In this case, Level 3 has secured an Administrative Use Permit with the City of San Luis Obispo Planning Department to support site development plans. Compliance with the conditions of this Permit, and the Airport Land Use Plan, would reduce the potential impacts to less than significant.

All other project elements sites are not subject to Airport Land Use Plans and no impacts therefore result.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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All project elements sites except for the San Ardo site are not located in the vicinity of a private airstrip. No impacts therefore result.

The San Ardo site, however, is located one-quarter mile from a private airstrip. However, construction activities would be short-term in duration, and the project site would be unstaffed during operations. Therefore potential impacts related to exposing people working at the proposed site to excessive noise levels are less than significant.

## **XII. POPULATION AND HOUSING**

### **Setting:**

The majority of elements that constitute the proposed project are located within developed areas that are typically of an industrial, commercial and/or residential nature. There are, however, a small number of sites located within relatively undeveloped, rural areas. No proposed project elements would create an impact on existing population and housing.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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None of the proposed project elements involve the creation of new housing or the expansion of existing public roads and infrastructure. Consequently, the project would not trigger either a direct or indirect growth in local or regional population.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project elements do not involve the removal of any residential housing. Consequently, no new replacement housing would be necessary.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project elements do not involve the removal of any housing and would not, therefore, displace any individuals. No replacement housing would be necessary.

### **XIII. PUBLIC SERVICES**

**Setting:**

The majority of elements that constitute the proposed project are located within developed areas that are typically of an industrial, commercial and/or residential nature. There are, however, a small number of sites located within relatively undeveloped, rural areas.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Construction and operation of the proposed project elements (three-person terminals/D-Nodes, non-staffed stations and underground conduit workarounds) would not create an impact on public services or facilities, including governmental facilities, fire and police protection, schools and parks. The terminals and stations will be fenced and have locked access. Each terminal and station will have a double-walled, aboveground diesel fuel tank for the back-up generator on-site; the tank system incorporates a high fuel alarm (local) and a tank rupture alarm (remote), and fire protection equipment would be installed at these sites per local codes.

**XIV. RECREATION**

**Setting:**

The proposed project is located in a variety of land use and recreational settings. In almost all cases, existing recreation facilities (such as parks) and/or opportunities (such as camping or fishing) can be found within the general vicinity and region of the various project sites.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project generally involves un-staffed facilities; only a limited number of the sites will have three permanent employees. The proposed elements would not increase the user demand on local or regional parks, or cause significant deterioration of them.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project elements do not involve the construction or expansion of any local or regional recreational facilities.

**XV. TRANSPORTATION/TRAFFIC**

**Setting:**

The majority of elements that constitute the proposed project are located within developed areas that are typically of a low-density industrial, commercial and/or residential nature. There are a few sites located within relatively undeveloped, rural areas. Traffic settings for location and/or access to the proposed project elements range the gamut, from gravel roads to four-lane state highways.

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
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

During construction of the proposed project elements (terminals, stations and underground fiber optic cabling), about four to seven workers would be commuting to the site for one to three months. Workers would commute during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and would park on the site. Occasionally, trucks would deliver equipment and/or materials to the site, as well as haul construction debris away to recycling centers or landfills. During the operational phase, the Terminals would be staffed by three persons who will commute during normal business hours and park on-site; the other Stations would be visited by one or two service personnel once a week, and the Workarounds would be the subject of intermittent visits for repair or inspection as required for system operation. Either phase of the project would cause a negligible increase in traffic at any given site, relative to its setting.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The limited project traffic described in a) 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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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Some of the proposed project elements involve the addition of driveways or other entry to the site from roadways, which could introduce a new traffic hazard. However, all such features will be designed and installed in accordance with local public works and/or traffic requirements which have been promulgated to avoid or reduce such hazards.

e)	Would the project result in inadequate emergency access?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input checked="" type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input type="checkbox"/>
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Several of the proposed project elements have the potential to limit or block emergency access on roadways during construction, due to temporary lane or road closure/blockage. With the incorporation of additional mitigation (see Table 4-1), this potential impact is considered less than significant.

f)	Would the project result in inadequate parking capacity?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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During construction of the proposed project elements (terminals, stations and underground fiber optic cabling), about four to seven workers would be commuting to the site for one to three months. Workers would commute during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and park on the site. Occasionally, trucks would deliver equipment and/or materials to the site, as well as haul construction debris away to recycling centers or landfills. During the operational phase, the Terminals would be staffed by three persons who will commute during normal business hours and park on-site; the other Stations would be visited by one or two service personnel once a week, and park on-site, and the Workarounds would be the subject of intermittent visits for repair or inspection as required for

system operation. Neither phase of the project would result in inadequate parking capacity at any given site.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Many of the local jurisdictions in which the proposed project elements are located have adopted policies, plans or programs supporting alternative transportation, including pedestrian, bicycle and mass transit. However, neither the location of, nor the low level of traffic engendered by, the project elements conflict with any of these public policy objectives. An argument could be made that fiber optic systems are highly consistent with such policies in that such networks support increased teleworking and “on-line” collaboration as opposed to in-person meetings and their associated traffic.

**XVI. UTILITIES AND SERVICE SYSTEMS**

**Setting:**

The majority of elements that constitute the proposed project are located within developed areas that are typically of a low-density industrial, commercial and/or residential nature. There are, however, a small number of sites located within relatively undeveloped, rural areas, in which utility and/or other service (water, sewer) will need to be added.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Terminal, 3R and D-Node facilities would generate minimal wastewater, particularly since only the Terminals are staffed (three persons). The ILA stations and the Workarounds would generate no wastewater. The proposed project elements will not, individually or collectively, exceed the wastewater treatment requirements of the respective Regional 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
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As discussed in a), the proposed project would generate minimal wastewater, and has low water requirements. It therefore would not require or result in the construction or expansion of water or wastewater treatment facilities.

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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The construction of several sites would involve site grading and/or paving activities with building, parking and access road/driveway development. Any new or expanded stormwater drainage facilities would be a negligible incremental increase in the local system for these low-level operations (mostly unstaffed), and would be installed in accordance with local regulations and plan reviews, as well as applicable state and federal regulations [e.g., Construction Activities Stormwater General Permit (NPDES CAF0002 Order No. 92-08 SWQ)].

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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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As previously described, the water requirements for the proposed project elements, individually and collectively, are minimal particularly as the most of the facilities are not staffed, and many are going into existing buildings with water supply already available. In those few instances where new water service is required (e.g., well or public system), the minimal water requirements for these facilities will not tax the 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 <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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The Terminal, 3R and D-Node facilities would generate minimal wastewater, particularly since only the Terminals are staffed (three persons). The ILA stations and the Workarounds would generate no wastewater. The proposed project elements would not overtax the local wastewater treatment provider.

f)	Would the project be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
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There would be relatively low levels of solid waste generation during construction from interior modifications of existing buildings, as well as new construction for a few sites. Operationally, waste generation at the facilities would be minimal, with only the Terminal sites permanently staffed (by three persons). This low demand for solid waste disposal is expected to be readily accommodated by the local recycling centers (as feasible) and landfills.

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
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As discussed in f), the proposed project would not generate substantial amounts of solid waste, and it would comply with applicable solid waste laws and regulations.

**XVII. MANDATORY FINDINGS OF SIGNIFICANCE**

a)	Does the project have the potential to 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, 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?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please see Sections I (Aesthetics), II (Agricultural Resources), and IX (Land Use Planning) herein for a discussion of impacts which would be less than significant with the incorporation of recommended mitigation (see Table 4-1). As discussed in Sections IV (Biological Resources), V (Cultural Resources) and VIII (Hydrology and Water Quality), impacts on fish, wildlife and plants, their habitat, and historical and pre-historical resources are expected to be less than significant with the measures already committed to by the Applicant.

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.)	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The scope of the cumulative impact assessment in this Initial Study is premised on information provided in the Final PEA. The results of the cumulative impact assessment are addressed in Section 8 of the Initial Study checklist for each site (found in Appendix A). Ventura County was the only air basin where the parallel construction of sites could produce cumulatively significant air quality impacts, and the Applicant has therefore committed to limiting construction to one Ventura County site per day (Ventura or Moorpark ILA) to avoid significant impacts. Additionally, the scope of the cumulative impact analysis includes the requirements of the existing Negative Declaration IX for the Level 3 Communications Infrastructure Project network regarding construction within existing utility ROWS. As a result of this, Level (3) must coordinate with other carriers and consult with affected local agencies to minimize cumulative impacts. In addition, Level (3) must submit reports to CPUC prior to the beginning of each quarter that summarize construction projects anticipated in the next three months.



c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input checked="" type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input type="checkbox"/>
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Please see Sections I (Aesthetics), III (Air Quality), XI (Noise), and XV (Transportation/Traffic) herein for a discussion of impacts which could cause substantial adverse effects on human beings, either directly or indirectly, but would be less than significant with the incorporation of recommended mitigation (see Table 4-1).

### 5. INITIAL STUDY DETERMINATION

On the basis of this Initial Study:

	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<b>X</b>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature \_\_\_\_\_  
Natalie Walsh, Manager  
Analysis Branch  
Energy Division  
California Public Utilities Commission

Date \_\_\_\_\_

### 6. SOURCES

Level (3) Communications, LLC. 2000. Proponent's Environmental Assessment. Prepared for the Public Utilities Commission of the State of California. Application 99-06-028.

### 7. LIST OF PREPARERS

See Table on following page.

<b>LIST OF PREPARERS</b>	
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