

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

## Cumulative and Other CEQA Considerations

## 7.0 CUMULATIVE AND OTHER CEQA CONSIDERATIONS

### 7.1 CUMULATIVE IMPACTS

This section identifies and evaluates whether the construction and operation of the project would contribute to a cumulative impact. The analysis considered the potential cumulative impacts that could result when impacts of the proposed project are considered in combination with impacts of other past, present, and reasonably foreseeable future projects. Some reasonably foreseeable future projects listed in Table 7.1-1 might not be approved or could be modified prior to approval; however, for the purpose of this analysis, approval and construction of identified projects was assumed. This section supports the conclusion that implementation of the project in combination with other reasonably foreseeable projects would not result in a significant cumulative environmental impact in any resource area.

#### 7.1.1 List of Cumulative Projects

Projects included in the cumulative impact assessment were identified by using a list approach (CEQA Guidelines Section 15130[b][1][A]). The projects listed in Table 7-1 are located within 2 miles of a component of the project and may overlap with its construction timeline. Figure 7-1 includes a graphic indicating the location of these projects in proximity to the project. To identify reasonably foreseeable, probable future projects, the primary research method was local planning departments' and state agencies' websites. The websites of the following organizations were reviewed and/or these agencies contacted regarding development projects. In addition, on behalf of the applicant, Stantec has reached out to Native American tribes surrounding the project area regarding the proposed project as further described in Section 5.18, Tribal Cultural Resources.

- Modoc County, Lassen County, Sierra County
- City of Alturas
- Modoc National Forest, Plumas National Forest, or Humboldt-Toiyabe National Forest
- CPUC
- CEC
- CAISO
- Caltrans
- Modoc County Transportation Commission
- OPR CEQAnet Web Portal

There are no past, present, or reasonably foreseeable CEC, CAISO, or CPUC projects within 2 miles of the project (CEC 2020; CAISO 2020; CPUC 2020). In addition to the above resources, the portions of the Zayo Prineville to Reno Fiber Optic Project within Nevada and Oregon are also considered to analyze the project as a whole and whether it would result in any cumulatively considerable impacts.



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### 7.1.2 Geographic Scope

Projects within a radius of 2 miles around the project were reviewed to identify any projects that could cause a cumulatively considerable impact. A 2-mile radius is appropriate because the effects of the project under the applicable environmental topics would be local and would likely be less than 2 miles (i.e., within the immediate visual landscape for aesthetics, within hearing distance due to rapid attenuation for noise, etc.).



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**Table 7-1: Past, Present, and Reasonably Foreseeable Projects within Two Miles of the Project**

Project Name	Planning Agency or Jurisdiction	Approximate Location	Approximate Distance from the Project	Project Description	Project Status
Zayo Prineville-Reno Fiber Optic Project (portion within Oregon)	Oregon Department of Transportation	225.3 miles of the Zayo fiber optic line that runs through Oregon from Prineville to the California state line within the US 395 right-of-way.	Within US 395 right-of-way	Zayo is proposing to construct and operate an underground fiber optic network from Prineville, Oregon, to Reno, Nevada, spanning a total of 433.8 miles. The fiber optic cable would improve the quality of rural broadband in south-central Oregon, northeast California, and northwest Nevada. The project is split into three segments: the Oregon running line, the California running line, and the Nevada running line. The Oregon running line portion of the project would extend from Prineville, Oregon to the California State line and is approximately 225.3 total miles.	<u>Project in environmental analysis phase as of January 2021. Construction timeline is unknown at this time; anticipated 2022 timeframe.</u>
Zayo Prineville-Reno Fiber Optic Project (portion within Nevada)	Nevada Department of Transportation	14.6 miles of the Zayo fiber optic line that runs through Nevada from the California state line to Reno within the US 395 right-of-way.	Within US 395 right-of-way	Zayo is proposing to construct and operate an underground fiber optic network from Prineville, Oregon, to Reno, Nevada, spanning a total of 433.8 miles. The fiber optic cable would improve the quality of rural broadband in south-central Oregon, northeast California, and northwest Nevada. The project is split into three segments: the Oregon running line, the California running line, and the Nevada running line. The Nevada running line portion of the project would extend from the California State line to Reno, Nevada and is approximately 14.6 total miles.	<u>Project in environmental analysis phase as of January 2021. Construction timeline is unknown at this time; anticipated 2022 timeframe</u>
Alturas Central Business District	Modoc County Transportation Commission	City of Alturas: Carlos Street, Modoc Street, North Street, 1st Street, 2nd Street, and 4th Street from Howard Street to US 395.	200 feet	The project includes improvements to pedestrian facilities along the Central Business District in the City of Alturas.	<u>Planning phase. No construction timeline or environmental analysis available as of January 2021.</u>
US 365 Transportation Concept Report	Caltrans	US 395 from Oregon State line to Nevada State line	Adjacent; Within US 395 right-of-way	The US 395 Transportation Concept Report is a Caltrans planning document that establishes a 20-year consensus-based concept for how California State Highways should operate and broadly identifies the nature and extent of improvements needed to attain operating conditions. Two major possible improvements identified in this report for US 395 include the following: <ul style="list-style-type: none"> <li>• Upgrading the existing two-lane conventional highway to a four lane divided expressway from Hallelujah Junction to the SR 36 junction</li> <li>• Implement traffic calming measures in the City of Alturas</li> </ul>	<u>Planning phase.- No construction timeline or environmental analysis available as of January 2021.</u>
Eastside Mud Tubs	Caltrans	US 395 at PM 50.1, 129.7, 6.8, 34.9, 35.48, 7.9	Adjacent; Within US 395 right-of-way	Caltrans, using state funds, is proposing to add a decanting site to an existing Caltrans disposal site on US 395 in Modoc County at PM 50.1 and in Lassen County at PM 129.7, 6.8, 34.9, 35.48, and 7.9. A decanting site is used to deposit water and mud routinely collected when cleaning culverts along state highways. The current use of each of these sites is described below: <ul style="list-style-type: none"> <li>• The disposal site on Modoc US 395 PM 50.1 is currently used for disposal activities and the staging of equipment and supplies.</li> <li>• The Borrow Pit on Lassen US 395 PM 129.7 is currently used for borrow and staging of equipment and materials.</li> <li>• The right-of-way on Modoc US 395 PM 6.8 is currently used by the motoring public and for maintenance activities.</li> <li>• The disposal site on Modoc US 395 PM 34.9 is currently used for disposal activities and the staging of equipment and supplies.</li> <li>• The pullout on Lassen US 395 PM 35.48 is currently used for staging of equipment and materials.</li> <li>• The pullout on Lassen US 395 PM 7.9 is currently used for staging of equipment and materials.</li> </ul> Decanting sites of a similar/compatible use to the current operations of this sites.	<u>Planning phase. Categorical Exclusion (15301, Class 1(c)) prepared April 27, 2020. Construction timeline unknown/unavailable.</u>



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Project Name	Planning Agency or Jurisdiction	Approximate Location	Approximate Distance from the Project	Project Description	Project Status
Class II and III Bikeway Improvements on US 395	Lassen County	US 395 in Lassen County from Modoc County line to Sierra County line	Adjacent; Within US 395 right-of-way	The Lassen County Bikeway Master Plan includes a proposed Class III bikeway facility from the Modoc County line to the Sierra County line as a regional and multi-modal bikeway connection. Improvements along US 395 would include improved signage and minor to moderate roadway improvements (i.e., widening)	Planning phase. No environmental analysis conducted for the project as of January 2021. Construction timeline unknown/unavailable; requesting funding for FY 19/20 and 20/21, respectively. Planning phase
Woodcrest Real Estate Ventures	Lassen County	US 395 and Old Highway Road (also known as Carol Drive)	100 feet from US 395	Proposal to construct a 9,100-square-foot retail store off of Old Highway Road near Doyle. The subject parcels are zoned A-1 (General Agricultural District) and have "Extensive Agriculture" and "Scenic Corridor" land use designations in the Lassen County General Plan, 2000. The Technical Advisory Committee conditionally approved Merger #2019- 008 on January 2, 2020, to merge the subject parcels. If this use permit is ultimately approved, the applicant will cause a Certificate of Merger to be recorded in the Official Records of Lassen County in order to finalize the merger.	Planning phase. Notice of Intent to Adopt a Negative Declaration circulated April 24, 2020. Public Review period ended May 25, 2020. Construction timeline unknown/unavailable as of January 2021. Planning phase
Janesville Main Street	Lassen County Transportation Commission	Janesville Main Street, County Road 235 from the intersection of US 395 to the intersection of SR 36	1 mile	In Janesville, along Main Street from the intersection of US 395 to the intersection of SR 36: <ul style="list-style-type: none"> <li>• Construct class 1 bike path</li> <li>• Capital rehabilitation and overlay Main Street</li> </ul>	Planning phase. No environmental analysis conducted for the project as of January 2021. Construction timeline unknown/unavailable; requesting funding for FY 19/20 and 20/21, respectively. Planning phase

Notes:

Caltrans = California Department of Transportation

FY = fiscal year

PM = post mile

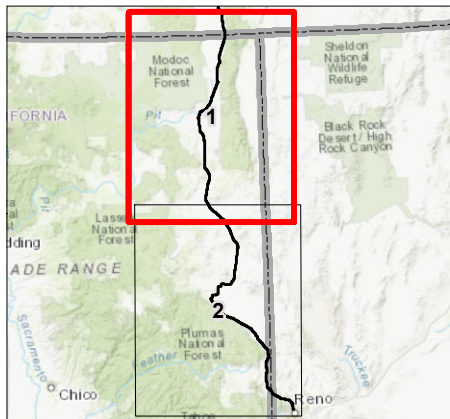
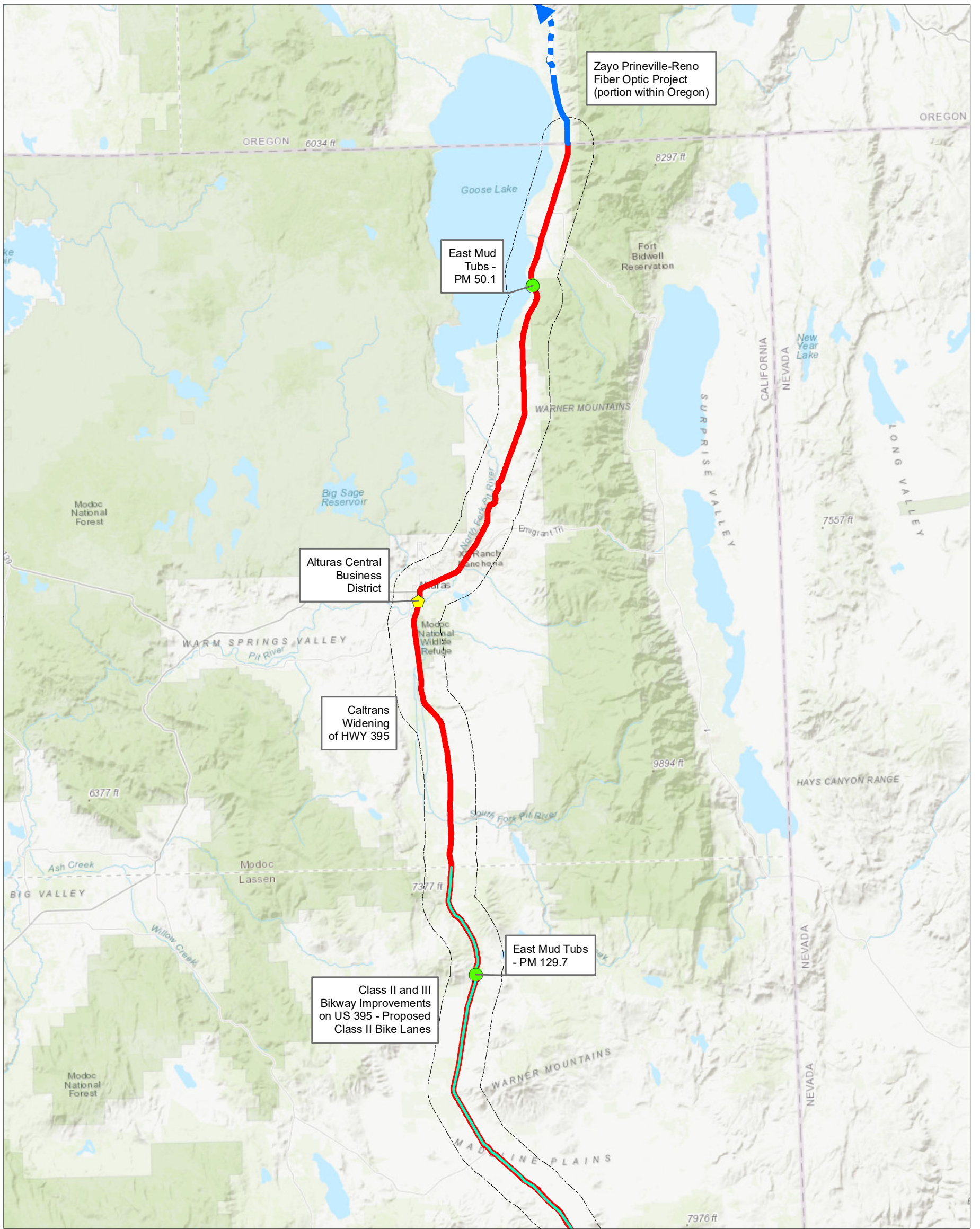
SR = State Route

US 395 = U.S. Highway 395

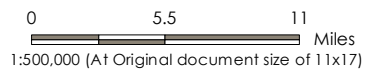
Zayo = Zayo Group, LLC

Sources: Caltrans 2017, 2020; Lassen County 2020; Lassen County Transportation Commission 2011, 2017; Modoc County Transportation Commission 2020





- 2-mile Buffer
- Cumulative Projects**
- ◆ Alturas Central Business District
- East Mud Tubs
- Class II and III Bikeway Improvements on US 395 - Proposed Class II Bike Lanes
- Caltrans Widening of HWY 395
- Zayo Prineville-Reno Fiber Optic Project (portion within Oregon)



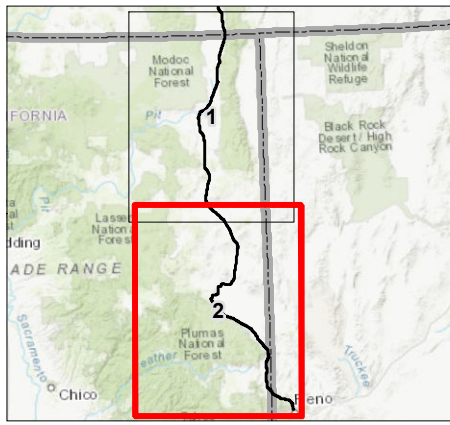
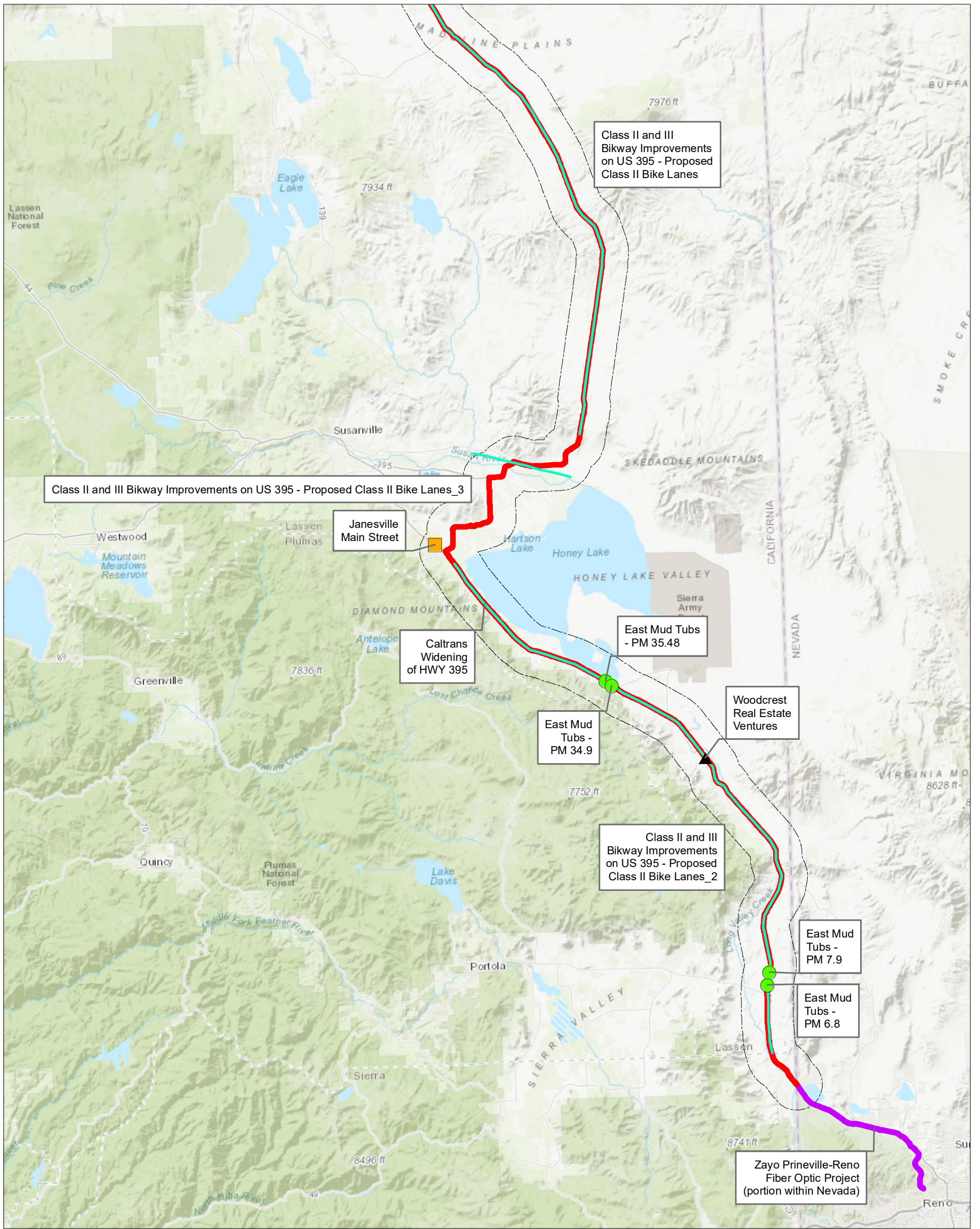
Project Location: Prineville, OR to Reno, NV  
 Prepared by JC on 2020-05-20  
 Technical Review by PM on 2020-05-20  
 Independent Review by CS on 2020-05-20

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

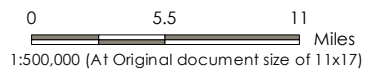
Figure No. **7-1**

**Cumulative Projects within Two Miles of Proposed Prineville to Reno Fiber Optic Line**

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



- 2-mile Buffer
- Cumulative Projects**
- East Mud Tubs
- Janesville Main Street
- ▲ Woodcrest Real Estate Ventures
- Class II and III Bikeway Improvements on US 395 - Proposed Class II Bike Lanes
- Caltrans Widening of HWY 395
- Zayo Prineville-Reno Fiber Optic Project (portion within Nevada)



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

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

Figure No. **7-1**

**Cumulative Projects within Two Miles of Proposed Prineville to Reno Fiber Optic Line**

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

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### 7.1.3 Cumulative Impact Analysis

The intent of this project is to provide increased broadband internet service to currently underserved populations. No long-term impacts have been identified, and implementation of APMs would further minimize less than significant impacts. As described in Section 5.0, Environmental Analysis, for agricultural and forest resources, land use and planning, mineral resources, population and housing, and public services, and utilities, either the project would have no impacts, or the impacts would be so minor that they would have no contribution to cumulative impacts in the project area.

#### 7.1.3.1 Aesthetics

The visual resources in the area primarily consist of varying natural landscape features. While not officially designated as a state scenic highway by Caltrans, US 395 provides intermittent views of these features and is identified as a local scenic roadway by Modoc, Lassen, and Sierra Counties. The project includes construction and operation of a new underground fiber optic line within the existing roadway right-of-way as well as other above- and belowground equipment, such as the three ILAs, line markers, and vaults. Material storage yards and staging areas would also be proposed during construction. As a result, Construction of the project would result in temporary changes in visual character of the area along the length of the project; however, because the project is linear, visual obstructions and changes in views would be temporary in any given location along the project alignment. Further, the majority of the project passes through rural areas that have little to no sensitive receptors that could be impacted by changes in views. Once constructed, the project would be located underground and would not result in any changes to views or the visual character of any portion of the project area.

Other cumulative projects in the area, as listed in Table 7.1-1, consist of linear transportation or infrastructure projects, and one smaller development project, which would have similar construction-related impacts as the project. Bicycle and pedestrian improvement projects proposed adjacent to US 395 along Janesville Main Street and within the Alturas Central Business District would likely result in changes to the visual environment. However, similar to the project, visual obstructions and changes in views would be temporary in any given location along the project alignment. In addition, the Nevada and Oregon running line portions of the Prineville to Reno fiber optic project would result in similar impacts as the project. These areas have very few sensitive receptors that could be impacted by views of project construction, and the presence of construction equipment and activities would be temporary given the transient nature of construction. Once construction is complete, the fiber optic cable would be underground and would not result in visual impacts. As a result, the project, in combination with other foreseeable projects, would not result in any operational or long-term visual changes to the area; therefore, the project would not contribute to this potential cumulative impact.

#### 7.1.3.2 Air Quality

Air quality impacts resulting from implementation of the project would be limited to construction-related emissions because once constructed, the project would include operation of the fiber optic line and would not result in any long-term operational emissions. As described in Section 5.3, Air Quality, with implementation of APM AIR-1 and APM AIR-2, all criteria air pollutant emissions were found to not



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exceed significance thresholds for air quality, and therefore, impacts were found to be less than significant. Further, construction activities would be short-term in any one given location along the project alignment, and the project would be required to limit heavy duty diesel motor idling to no more than 5 minutes at any given time.

Air pollution is largely a cumulative impact by its very nature and therefore, no single project is sufficient in its overall emissions in isolation to result in nonattainment of ambient air quality standards. As such, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The significance thresholds were developed to analyze whether a project's contribution to the cumulative impact is considerable. Therefore, if a project exceeds the identified significance thresholds, its emissions would also be cumulatively considerable, resulting in a significant cumulative air quality impact to the region's or air basin's existing air quality conditions. Because the project would result in emissions that are below the thresholds of significance with APMs incorporated, it would not result in a cumulatively considerable impact. Other projects in California are mostly related to infrastructure and transportation improvements, with one smaller development project, and would involve similar construction related air quality emissions and would be required to comply with similar rules and regulations as the project, including implementation of mitigation measures to reduce impacts related to emissions below the thresholds of significance. The Oregon and Nevada running line portions of the project are outside of California, and therefore, would be required to comply with the appropriate jurisdiction's regulations governing air quality emissions. Potential impacts and associated mitigation measures would be subject to review and up to the discretion by the applicable agencies. The project does not individually exceed the thresholds of significance, which in their very nature account for cumulative emissions in the region. The project would not result in a cumulatively considerable impact to air quality when considered with other projects in the region. Therefore, the project would not have a considerable contribution to a cumulative impact related to air quality.

### 7.1.3.3 Biological Resources

~~Most areas along US 395 are sparsely populated and are surrounded by forested or wooded areas, grasslands, or sloped mixed vegetation areas. Numerous wildlife species are known to occur within the project area including reptiles, amphibians, birds, and mammal species. Construction work associated with the project could directly or indirectly (through habitat modification) affect sensitive wildlife and fish species, but would not have a substantial direct or indirect adverse effect on such species. The majority of project impacts on biological resources would be temporary and associated with site preparation and construction activities.~~

While the project would avoid impacts on the majority of the wetlands, sensitive natural communities, and special status plant populations through micro-siting and directional boring efforts, some indirect impacts on these resources may be unavoidable. The project design would avoid direct impacts on wetlands, sensitive natural communities, and special status plant populations as much as possible, and site restoration would help minimize any long-term temporary impacts after construction is complete. Additional construction-related factors could result in habitat loss or modification. Sensory disturbances associated with equipment noise and the increased presence of personnel could cause displacement or avoidance of wildlife species. During operation, habitat removal or modification would be unnecessary,





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except in the unlikely event that repairs are required, and conduit must be excavated. As discussed in Section 5.4, Biological Resources, all potential impacts related to biological resources would be reduced to a less than significant impact with implementation of APMs.

The majority of the projects in Table 7.1-1 would either be constructed within the more populated areas along the project alignment (i.e., the City of Alturas or Janesville) or would be constructed along the US 395 right-of-way, similar to the project.

Construction of these projects, particularly linear improvements proposed along US 395 or on local roadways, could affect riparian habitats or wetlands if water bodies are crossed. Construction and operation activities may also result in temporary impacts to habitat and changes in wildlife movement due to construction activities and human presence. However, many of the proposed projects summarized in Table 7.1-1, such as the US 395 bicycle improvements, Janesville Main Street, and the Alturas Central Business District, would occur within developed or disturbed areas. -A Negative Declaration was prepared for Woodcrest Real Estate Ventures project and determined that the project would not have a substantial adverse effect, either directly or through habitat modifications, on any species-identified sensitive species or riparian habitat. -Additionally, the project and other projects in Table 7.1-1 would also be required to comply with applicable laws, regulations, and permit conditions.

To minimize potential impacts on special status species and other sensitive biological resources, the project would implement APMs. In addition, due to the physical distance between cumulative project construction sites and the short-term nature of construction activities, the project's contribution to cumulative impacts would not be cumulatively considerable.

#### 7.1.3.4 Cultural and Tribal Resources

A project would have a cumulatively considerable impact on cultural or tribal resources if it would potentially disturb unidentified subsurface human remains or historic or archaeological resources through ground disturbance activities. As discussed in Section 5.5, Cultural Resources, and Section 5.18, Tribal Cultural Resources, there is the possibility that construction of the project could disturb known and unknown cultural or tribal cultural resources, and as such, APMs would be implemented to reduce potential impacts related to these resources. These APMs include compliance with federal, state, and local regulations governing the procedures to be taken if a cultural or tribal resource is discovered during construction activities.

Several other projects in the cumulative scenario could take place in the same location or directly adjacent to the new fiber optic line; therefore, there is some potential that the project and another project could affect the same unknown resource or result in cumulatively significant impacts on unknown resources. However, it is reasonable to assume that, similar to the project, potential impacts on unknown cultural or tribal cultural resources associated with other projects in the immediate vicinity, as well as with other projects in the area, would be appropriately mitigated by construction monitoring and other standard mitigation measures (including recordation, avoidance, and relocation), as appropriate. Numerous California laws and policies are in place that require measures to avoid, reduce, or minimize impacts to



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cultural and tribal resources. Therefore, the total impact of the project in conjuncture with other projects in the area related to unknown cultural resources would not be cumulatively considerable.

#### 7.1.3.5 Energy Resources

As discussed in Section 5.6, Energy, the project would not result in substantial fuel usage when analyzed against the total fuel available in the area and would comply with the state's anti-idling and emissions regulations during construction activities. Other foreseeable projects in the region mostly consist of linear transportation and infrastructure projects that would likely have similar construction-related impacts to energy resources as the project. Bicycle and pedestrian improvement projects proposed adjacent to US 395, along Janesville Main Street, and within the Alturas Central Business District would not result in long-term energy impacts once construction activities are complete. The Woodcrest Real Estate Ventures development project could result in operational increase in energy consumption. Similarly, the Nevada and Oregon running line portions of the Prineville to Reno fiber optic project would result in similar, construction-related fuel and energy consumption impacts as the project. Other foreseeable projects would be required to comply with their respective local or state energy efficiency regulations for construction, which would be subject to the review and discretion of the local jurisdictions in these areas. Therefore, because the project would result in a relatively minor use of fuel resources and would comply with the state's anti-idling and emissions regulations, it would not have a considerable contribution to a cumulative impact when combined with other projects listed in Table 7.1-1.

#### 7.1.3.6 Geology, Soils, and Paleontological Resources

Impacts related to geology, soils, and minerals from implementation of the project are largely related to construction activities and movement of soil onsite. As discussed in Section 5.7, Geology, Soils, and Paleontological Resources, the project would not result in any significant impacts related to geology and soils with implementation of state and local regulations governing the protection of soils and related to structural stability or limiting the potential for erosion, such as implementation of an SWPPP. Additionally, there is a moderate potential for the presence of paleontological resources in the project area; however, because the project is located would mostly be located within an existing roadway right-of-way, it is likely that any paleontological resources in the area would have been discovered during placement of the roadway, and therefore, the risk of directly or indirectly destroying a unique paleontological resource or geologic feature is limited. Several materials storage yards and staging areas would be located outside of the right-of-way and would be used for vehicle parking and short-term placement of equipment, conduit, parking, etc. Accordingly, minimal ground disturbance would occur in these areas. Therefore, individually, the project would not result in a significant cumulative impact related to geology, soils, and paleontological resources.

Other foreseeable projects identified in Table 7.1-1 would consist of transportation- or infrastructure-related projects, with one smaller development project, all of which would likely involve similar impacts related to geology, soils, and paleontological resources. Construction of these projects would likely include vegetation removal, grading, staging, trenching, excavation, and other activities that would result in the temporary and short-term disturbance of soil and would expose disturbed areas to storm events. Related projects would also be required to comply with the federal, state, and local regulations governing



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excavations and erosion potential for construction activities and implement recommendations contained in project-specific geotechnical reports. Therefore, it is anticipated that any potential impacts associated with geologic and soil conditions would be mitigated within the respective sites of these projects. The Nevada and Oregon running line portions of the Prineville to Reno fiber optic project would likely result in similar impacts related to geology, soils, and paleontological resources since excavation, trenching, and restoration methods for these portions of the project would likely be the same when installing the fiber optic line. A SWPPP would still be implemented for the Nevada and Oregon running lines, since SWPPPs are required under the EPA's NPDES. Therefore, although each cumulative project site has its own unique geologic considerations, adherence to all relevant plans, codes, and regulations with respect to construction would avoid cumulative impacts related to exposure to geologic hazards. Therefore, no additive effect would result from construction of the project, and the project would not contribute to any cumulative impacts related to geology, soils, or paleontological resources.

#### 7.1.3.7 Greenhouse Gases

GHGs in their very nature are a cumulative impact and are discussed in Section 5.8, Greenhouse Gas Emissions. As discussed in Section 5.8, the project would not result in GHG emissions that would exceed the thresholds of significance and would not conflict with the California's 2017 Climate Change Scoping Plan, and therefore, the project would result in a less than significant impact. Once the project is constructed, it would not result in any long-term GHG emissions or interfere with long-term GHG reduction goals. Therefore, the project individually would not substantially contribute to a significant cumulative impact related to GHGs.

Other foreseeable projects within or adjacent to the project area are related to infrastructure and transportation improvements, with the exception of the one smaller development project, and would involve similar types-of construction-related GHG-emissions. Some of the projects in Table 7.1-1 would result in operational GHG emissions through an increase in VMT. The Nevada and Oregon running line portions of the Prineville to Reno fiber optic project would result in similar construction-related GHG emissions as the project and would be subject to review by the local jurisdictions in these areas. Since constructions emissions would likely be similar to the project, it is not anticipated that any additional mitigation or GHG reduction methods would be needed. Therefore, the project, when combined with the cumulative projects in the area, would not have a considerable contribution to a cumulative impact related to GHG emissions.

#### 7.1.3.8 Hazards and Hazardous Materials

Temporary construction activities associated with the project would involve the transport and use of gasoline, diesel fuel, hydraulic fuel, solvents, and oils typically associated with operation of construction equipment and vehicles. Non-toxic, non-hazardous bentonite drilling fluid would be used for directional boring, and a mineral-based, non-toxic, non-hazardous lubricant would be used for conduit proofing. These chemicals would be used and stored on the project site during construction, as well as transported along public roadways. Should any hazardous soil be encountered during construction, such material would be disposed of properly at an approved hazardous waste disposal facility in California such as the Kettleman Hills Facility in Kettleman City, California. Construction activities associated with the project



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~~have the potential to result in hazardous materials release through the use and transport of fuels, oils, and lubricants that would be used throughout construction activities or through accidental release of hazardous materials encountered during excavations.~~ Additionally, the project would be located within 0.25 mile of several schools along the alignment and could have the potential to emit or release hazardous materials near these schools. As discussed in Section 5.9, Hazards, Hazardous Materials, and Public Safety, potential impacts would be minimized through compliance with federal, state, and local and through project APMs.

Cumulative impacts could occur if other reasonably foreseeable current or future projects in the area would have the potential to cause an accidental release or potentially expose sensitive receptors to additional hazards in combination with the project. Other cumulative projects in the area are related to infrastructure and transportation, with the exception of the one development project, all of which would involve similar types of construction-related impacts as the project. Similar to the project, these other projects would also be required to comply with federal, state, and local regulations governing these of hazardous materials during construction activities or the procedures taken in the event of a hazardous materials spill. All impacts related to hazardous materials would be temporary and would incorporate these standard hazardous materials safety measures to reduce potential impacts related to construction activities.

Therefore, the project, when combined with other projects in the area, would not have a considerable contribution to a cumulative impact.

#### 7.1.3.9 Hydrology and Water Quality

Construction of the project could result in impacts to water quality from using fuels or other hazardous materials near waters or through increased erosion, sedimentation, or flooding impacts, as well as the frac-out from the use of directional boring equipment. As discussed in Section 5.10, Hydrology and Water Quality, hydrology and water quality impacts associated with the project would be reduced through implementation of a SWPPP. The SWPPP would include measures to reduce erosion, sediment runoff, and contain pollutants onsite, which would minimize or avoid impacts to waters and water quality. The project right-of-way crosses FEMA 100-year floodplain, but no impedance or redirection of flood flows would be anticipated as a result of the project. In addition, temporary work areas such as staging areas and potential material storage yards would not impede or redirect flood flows. Additionally, ~~the project would not result in any substantial additional impervious surfaces, be located in a flood zone, or substantially impact groundwater supplies.~~ Therefore, the project would not individually result in a significant cumulative impact.

Cumulative impacts could occur if any other reasonably foreseeable current or future project would have the same or similar impacts to water quality, drainage patterns, or groundwater supplies. Construction of the cumulative projects shown in Table 7.1-1 would also be required to comply with federal, state, and local regulations and standard permit conditions governing water quality, including implementation of a SWPPP, if the projects are more than 1 acre. The Nevada and Oregon running line portions of the Prineville to Reno fiber optic project would likely result in similar impacts related to water quality through erosion, sedimentation, and accidental spills. Compliance with the SWPPP would also be required for the



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Nevada and Oregon running line portions of the project because there is a federal requirement administered through the EPA NPDES program. Any additional mitigation related to the protection of water quality during construction would be subject to review and determination by the local jurisdictions in the respective areas. However, with implementation of the SWPPP, no additional significant water quality impacts would be anticipated for these areas.

Additionally, several of the projects identified in Table 7.1-1 would likely result in new impervious surfaces that could affect local hydrology and drainage; however, the project itself would not result in any additional impervious surfaces so it would not add to this potentially cumulative impact. Water used onsite for watering or other needs would not deplete or interfere with groundwater supplies or recharge or conflict with any water quality plans. Therefore, overall, the project would not have a considerable contribution to a cumulative impact related to hydrology or water quality when combined with other projects in the area.

#### 7.1.3.10 Recreation

As discussed in Section 5.16, Recreation, because multiple trails cross over or are accessed via US 395, construction of the project could result in temporary impacts to parks and other recreational facilities through construction-related noise, traffic congestion, or access limitations. APM REC-1 would be implemented to coordinate with BLM, notify recreational users of disruptions to trail access, and document trail conditions prior to construction and reconstruct trails or facilities to original conditions. All impacts to recreational resources would be temporary and would be restored upon completion of construction activities.

Other cumulative projects listed in Table 7.1-1 are related to infrastructure and transportation improvements with the exception of the one smaller development project. In addition, several of the projects summarized in Table 7.1-1 propose bicycle facility improvements that would increase recreational facilities within the area. Foreseeable projects that would be located adjacent to US 395 within the same vicinity of the project would have the potential to involve similar types of construction-related impacts to recreational resources. A cumulative impact could occur if construction and operation of multiple projects would impact a recreational resource such as a trail or park through closure or prolonged construction noise or traffic congestion. Multiple trails cross or are accessed via US 395 along the project running line, including Shaffer Mountain Trail near Litchfield (Post Mile 77.3), Belfast Petroglyphs OHV Trail near Litchfield (Post Mile 93.4), Buckhorn Backcountry Byway (Post Mile 115.2) and the California Historic Trail (Post Miles 21.9, 29.2, 29.5, 30.2, 31.1, 34, 42.8, 42.9, 43.1, 43.9, 50.6, 72.5, 76.4, and 77.6); however, it is unlikely that construction activities would impact access. Any closures that are required for public safety during project construction would be temporary and require coordination with resource agencies and notification of planned closures. Because the project is linear, construction would be transient in nature and would not permanently alter recreational facilities as the project would not have a considerable contribution to a cumulative impact on recreational resources.



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### 7.1.3.11 Noise

As discussed in Section 5.13, Noise, the project would not result in any permanent increases in noise or vibrations in the area. Construction noise and vibrations would occur along the length of the project and within proposed ILAs, staging areas, and material storage yards; however, as discussed in Section 5.13, no one sensitive receptor would be substantially impacted by construction noise or vibration for more than a few days at any given receptor. Further, because noise impacts are normally localized and attenuated rapidly with distance, noise impacts past 500 feet and vibration impacts past 100 feet are generally not noticeable beyond ambient or existing conditions. Noise generated from the ILAs, temporary staging areas, and material storage yards would be less than generated from active construction activity.

Cumulative noise impacts could occur if the projects listed in Table 7.1-1 would result in noise or vibration levels in excess of standards and would occur at the same time and in the same general location as the project. Other reasonably foreseeable projects within the nearby area are related to infrastructure and transportation improvements and would involve similar types of construction-related temporary noise impacts. Such projects that would be located adjacent to US 395 within the same vicinity of the project and would have the potential to impact the same sensitive receptors. However, none of the projects listed in Table 7.1-1 are anticipated to occur at the same time as the project and would be temporary given the linear nature of such projects. Therefore, the project when combined with other projects in the area would not have a considerable contribution to a cumulative impact related to noise or vibration.

### 7.1.3.12 Transportation

As discussed in Section 5.17, Transportation, construction activities associated with the project would cause a temporary and short-term increase in traffic due to the additional number of vehicles on the roads. This temporary traffic volume increase would be spread out over the entire project alignment, and the increased traffic levels during peak construction would remain within acceptable limits in the context of road capacities. Temporary road closures may be required at various locations to ensure public safety; however, the majority of the project alignment traverses undeveloped areas with minimal vehicular traffic or bicycle and pedestrian facilities. Emergency access routes ~~will~~would be maintained throughout project construction (APM TRA-1). No long-term or permanent impacts would result from implementation of the project.

The project could have cumulatively considerable impacts related to transportation if the other projects listed in Table 7.1-1 were to overlap in location and result in increased trips, congestion, or service capacities on US 395 or surrounding roadways. The other projects listed in Table 7.1-1 mostly consist of transportation or infrastructure projects, with one small development project. These projects would likely have similar impacts as those described for the project and would potentially result in similar impacts as the project, including temporary delays along US 395 for construction activities. Therefore, because project construction would be temporary, linear, and would not be substantially increased with other cumulative projects in the area, the project would not have a considerable contribution to a cumulative impact.



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### 7.1.3.13 Utilities and Service Systems

As discussed in Section 5.19, Utilities and Service Systems, impacts related to utilities could occur from construction-related water use and disposal of waste. Approximately 1.8 million gallons of water would be needed over the approximately 6-month construction period. ~~Water would be required~~ for dust control and other construction-related uses onsite; however, water would be trucked onsite and would not require use of any local municipal water supplies or result in any exceedances of capacities. Therefore, there would be a less than significant impact related to water supplies and infrastructure. Additionally, the project would not require the construction of any storm drain facilities or wastewater facilities. Construction activities would also ~~result-generate 20 pounds per day of non-hazardous solid waste related to cable trimmings, package materials, and construction debris. Waste materials would be properly disposed of in one of the landfills or recycling centers identified.~~ ~~in construction waste and debris, which would be brought to nearby landfills.~~ APMs would be implemented to divert recyclable construction waste from local landfills to recycling facilities.

The projects listed in Table 7.1-1 would consist of transportation and infrastructure projects, with the exception of the one smaller development project, and would likely have similar waste- and debris-producing potential as the project. The cumulative projects in California would likely require similar recycling plans in order to comply with state and local management reduction statutes. The Nevada and Oregon portions of the Prineville to Reno fiber optic line project would be required to comply with the respective local and state management and reduction statutes in each state. Any additional mitigation related to construction waste in the Nevada and Oregon would be subject to review and determination by the applicable jurisdictions. Overall, because the project itself would result in minimal waste as well as minor uses of water during construction activities, the project would not result in a considerable contribution to a cumulative impact when combined with other projects in the area to utilities and service systems.

### 7.1.3.14 Wildfires

As discussed in Section 5.20, Wildfires, impacts related to wildfires would be limited to construction activities along the length of the project. Construction of the project would involve the use of various flammable materials and potentially spark-producing equipment, which could potentially start a fire in the various vegetated areas and areas that have a designation of “very high fire severity” along the project if not handled appropriately. Once construction is complete, management of the telecommunications infrastructure would generally occur remotely, with onsite maintenance only as necessary. Access vaults would be accessed periodically for routine maintenance via US 395 and other existing and maintained roads. All periodic maintenance activities would comply with local and state regulations governing wildfire prevention. The primary aboveground project component would be the ILAs. As discussed in Section 5.20, Wildfires, the risk that a fire could ignite within an ILA is low due to required design specifications.

The project could have cumulatively considerable impact related to wildfires if other projects listed in Table 7.1-1 would occur in a similar or adjacent location and would also have the potential to start wildfires during construction activities, further exacerbating the risk of wildfires to occur or spread. The projects listed in Table 7.1-1 would mostly consist of transportation or infrastructure projects, with the



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exception of one smaller development project, all of which could have the potential to start a wildfire from the use of construction equipment or vehicles. The California projects would all be required to comply with local, state, and federal regulations governing wildfire protection and may also be required to develop and implement a fire protection plan, similar to the project. Any regulations or mitigation measures for the Nevada and Oregon portions of the Prineville to Reno fiber optic line project would be subject to review by the local and respective state jurisdictions' requirements for wildfire protection and care and maintenance of construction equipment and vehicles. The project would comply with existing regulatory requirements, and with implementation of Mitigation Measure FIRE-1, Construction Fire Protection Plan, potential impacts related to wildfires would be minimized. Therefore, the project, when combined with the other cumulative projects listed in Table 7.1-1, would not have a considerable contribution to a cumulative impact related to wildfires.

## 7.2 GROWTH-INDUCING IMPACTS

CEQA specifies that the growth-inducing impacts of a project must be addressed in an Environmental Impact Report (CCR Section 21100[b][5]). Specifically, Section 15126.2(e) of the State CEQA Guidelines states that the Environmental Impact Report shall do the following:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Direct growth inducement would result if a project would involve construction of new housing, which would facilitate new population to an area. Indirect growth inducement would result, for instance, if implementing a project would result in any of the following:

- Any economic or population growth, in the surrounding environment that would directly or indirectly, result from the proposed project.
- Any increase in population that could further tax existing community service facilities (i.e., schools, hospitals, fire, police, etc.), that would directly or indirectly result from the proposed project.
- Any obstacles to population growth that the proposed project would remove.
- Any other activities directly or indirectly encouraged or facilitated by the proposed project that would cause population growth that could significantly affect the environment, either individually or cumulatively.





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As discussed in Section 2.1, Project Background, the purpose of the project is to provide broadband service to currently undeserved residences along the project alignment through the installation of fiber optic broadband facility cable. The project would extend ~~194.93~~<sup>193.9</sup> miles of fiber optic cable within existing roadways across portions of Modoc, Lassen, and Sierra Counties. No new homes or businesses are proposed as part of the project, and the project is not anticipated to induce population growth either directly or indirectly. The surrounding area in each of the counties is anticipated to decrease from 2020 to 2040, and the project would not affect the change in population, nor would it remove obstacles to population growth. At the peak of construction, approximately ~~48~~<sup>66</sup> construction workers of about ~~eight~~<sup>eleven</sup> crews (six people per crew) would be located across various construction locations simultaneously. It is anticipated that construction workers would be drawn from existing staff in the local area. Because the construction duration is short (approximately 6 months), it is not anticipated that a construction workforce would permanently relocate to the area. The project area has adequate hotels and motels available to provide accommodations to any workers that may temporarily relocate to the area during construction. Although construction workers traveling to the project area may use existing public services or amenities, this potential increase in demand would be minimal and temporary and would not require new or altered government facilities. Thus, project construction activities would not directly or indirectly induce substantial population growth. Once the project is constructed, the system would be remotely monitored through networks in Tulsa, Oklahoma. Based on remote monitoring, the applicant would send out crews if the infrastructure needs to be repaired or if a mandated relocation is needed, and permanent workers would not be required in the project area for the operation and maintenance of the project; therefore, the project would not directly or indirectly induce population growth.



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