

### 3 APPROACH TO ENVIRONMENTAL ASSESSMENT

During the planning of the project, the applicant (EPGN) recognized that the installation of the system and of the regeneration stations may have the potential for environmental effects. Several steps were taken during the planning process in order to avoid or mitigate potential effects. The telecommunication system ROW was rerouted several times during the planning stage in order to avoid or minimize potential impacts to biological and cultural resources. Where avoidance of a resource was not feasible, design measures were integrated into the proposed action, which minimize the adverse effects to these resources to below the level of significance. Accordingly, the Initial Study of project impacts included a determination of whether the following design/mitigation measures would adequately protect environmental resources during construction and operation of project components. At those locations where these measures were not considered adequate, additional mitigation measures have been developed; these additional specific mitigation measures are discussed in Section 4.0 of this IS/MND and summarized later in Table 3.3-1. EPGN is also in the process of obtaining the necessary permits for construction and operation of the system, as summarized in Table 1.5-1. There may be additional mitigation measures required by these permits. If so, they will be incorporated in the mitigation specified in this IS/MND.

#### 3.1 AIR QUALITY

Best management practices for construction activities will be followed by all work crews. These practices are designed to minimize construction-related emissions of ozone precursor compounds and fugitive dust.

- ▶ Work crews will use low-emission construction equipment and/or reformulated fuel.
- ▶ Construction sites will be sprayed with water, when needed, to reduce suspension of dust particulates.
- ▶ Ground covers will be reestablished to prevent erosion according to the provisions of the SWPPP.
- ▶ Crews will maintain engines of trucks and heavy equipment.
- ▶ Equipment will be cleaned, as needed, to prevent tracking of soil onto adjacent roads.
- ▶ Tracked soil will be removed from adjacent roads.
- ▶ When wind speed exceeds 25 mph, grading activities will cease.

#### 3.2 RESOURCES

The following mitigation measures for Biological Resources apply to plants, wildlife, and habitat. Detailed information regarding avoidance, protection, and mitigation measures is provided in Section 4.5.

##### PLANTS

- ▶ Where vegetation is impacted by construction activity, the area will be revegetated as required by the landowner or land managing agency. Generally, the revegetation objective will be to return the disturbed area to pre-construction condition. Periodic inspection of the ROW will be conducted by EPGN and reclamation efforts will be enhanced where necessary.

- ▶ During construction in sensitive areas, EPGN will clear the minimum ROW width possible and minimize ROW damage where possible.
- ▶ EPGN will monitor the success and maintenance of erosion control measures and revegetation programs. The monitoring program will identify problem areas and corrective measures to ensure vegetation cover and erosion control.
- ▶ Vegetation will be cleared and the construction ROW will be graded as needed to provide safe and efficient operation of construction equipment. The width of the construction ROW will be restricted to avoid undue surface disturbance to adjacent resources.
- ▶ Trees, brush, and shrubs within the construction ROW will be cut or scraped at or near the ground level. Except for the area to be excavated for the trench, the vegetative root system and subsurface soil will be left intact to the greatest extent practical. This will assist in stabilization of the soils within the ROW throughout construction. All brush and other materials that are cleared from the ROW will be placed as a windrow along the ROW, spread over the ROW to inhibit erosion, or removed from the ROW and disposed of as agreed with the landowner or land managing agency.
- ▶ Where vegetation has been completely removed, the ROW will be restored as required by the BLM, CPUC, CDFG, or other applicable agencies and/or private landowner controlling the land.

## **WILDLIFE**

- ▶ In sensitive or important wildlife habitats, EPGN will clear the minimum ROW width possible and minimize ROW damage.
- ▶ Access to the ROW will be restricted where agreed to by the appropriate land managing agency and land tenant, by construction barricades, erecting fences with locked gates at road intersections, and by posting signs. Efforts to control off road vehicle use will continue throughout the life of the project. Signs, gates, and barricades will be maintained.
- ▶ EPGN will revegetate all disturbed habitat, as required by the BLM, CDFG, and other applicable agencies.
- ▶ Surface disturbing activities will be minimized along the entire length of the ROW. Existing roads will be used for travel and equipment storage whenever possible. New, permanent access roads will not be created except as needed to access the regeneration stations.
- ▶ EPGN will prohibit vehicle operation (including construction equipment and employer access) off the ROW by construction workers, except in areas designated for off road vehicle use specified by the BLM.

## **HABITAT**

Construction of the proposed project could temporarily disturb a 25-foot ROW. Upon completion of the construction phase of the proposed project, the ROW will be restored as near as possible to pre-construction conditions. The following general measures will be implemented as appropriate:

- ▶ With the exception of areas of additional work-space for large directional bores, all construction activities will be contained within the limits of the proposed construction ROW and proposed regeneration station sites.
- ▶ The quantity and duration of soil exposure will be minimized.
- ▶ Critical areas will be protected during construction by reducing the velocity of water and redirecting runoff as appropriate.
- ▶ Erosion control measures will be installed and maintained during construction.
- ▶ Vegetation will be re-established as soon as possible following final grading.
- ▶ The ROW will be inspected by EPGN to maintain erosion control as needed until final stabilization is achieved.

### **THREATENED AND ENDANGERED SPECIES**

Qualified biologists will be deployed by EPGN during construction of the proposed project.

- ▶ Qualified biologists will be used to alert EPGN's environmental inspector and construction personnel of areas where potential habitat for Threatened or Endangered Species (TES) occurs. Inspectors will also ensure the operation of construction vehicles avoids injury to wildlife species or habitat. Efforts will be made to protect any wildlife species that is present during construction.
- ▶ Qualified biologists will be deployed in key sections of the route during construction to observe the presence of special-status species. Monitors are responsible for checking construction equipment each morning prior to start-up for the presence of desert tortoises. During cooler nighttime temperatures when tortoises are more active, they may crawl underneath construction equipment. If special-status species are found to be present during construction, all activities will be stopped while a qualified biologist removes the species to a safe location according to the proper agency protocols. Depending on the type and condition of the species, federal or state agencies may be contacted.

### **CULTURAL RESOURCES**

EPGN will conduct appropriate data research for known cultural resources in the proposed project area, and avoid such resources in designing and constructing the project. Should cultural resources be encountered during construction, all earthmoving activity which would adversely impact such resources will be halted or altered so as to avoid such impacts, until the petitioner retains the service of a qualified archaeologist who will do the appropriate examination and analysis. The archaeologist will consult with appropriate federal, state and local agencies concerned with cultural resources, so that any potentially significant impacts upon cultural resources are assessed and properly avoided or mitigated. The archaeologist will, in coordination with agencies, develop a plan for avoiding or mitigating any potential impacts upon those resources encountered.

## WATER QUALITY

EPGN must comply with all city, county, district, state, and federal government regulations concerning protection of water quality as a result of the proposed project. Part of this compliance includes creating a SWPPP, which will include specific mitigation measures. In addition to those, EPGN will enact the following measures to protect water quality within the project area:

- ▶ Construction within wetlands will be by directional boring outside the boundaries of the wetlands, thereby not disturbing any wetlands habitat;
- ▶ No construction equipment will be refueled and lubricated within 100 feet from any wetlands or body of water; and
- ▶ Spill prevention measures as outlined in Appendix E.

## LAND USE

***Grazing/Fences/Livestock.*** EPGN has contacted all landowners within the proposed project alignment. Negotiations are underway to purchase easements across private land and secure permits or easements across public lands for the construction of the proposed project. Permission will be obtained for access and mitigation details will be worked out on an individual basis. In general, existing fences crossing the ROW will be braced, cut and temporarily fitted with a gate to permit passage. During construction, the access will be controlled as needed to prevent undesired passage by humans or livestock. Gates will be locked with access being granted to the landowner and EPGN personnel only. Upon completion of construction activities, existing fences will be replaced, braces left in place, and gates permanently installed. The ROW will be revegetated to restore land conditions to as near normal as possible to pre-construction conditions. Livestock grazing on the ROW will be temporarily disrupted until revegetation is accomplished.

### 3.3 ADDITIONAL MITIGATION MEASURES

In addition to the design/mitigation measures presented in the previous pages, measures were developed during the environmental review of the proposed project. These mitigation measures are discussed in detail in Section 4.0 and are summarized in Table ES-1.