Chapter 1
Introduction

IP Networks, Inc., (IPN) proposes to offer Last Mile telecommunications service in urban areas in Northern California to various entities (their clients) by constructing new fiber optic cable facilities and ancillary equipment between structures to which the service would be provided. The term Last Mile refers to the distance between the source facility and the new customer. IPN has not identified all customers and therefore did not list specific construction locations at the time of submittal of their application for the Certificate of Public Convenience and Necessity (CPCN). Because it is not possible to exactly identify the location of each potential customer, the project has no preplanned routes or specific project maps. To adapt to this type of project, the California Public Utilities Commission (CPUC) developed the Last Mile initial study/mitigated negative declaration (IS/MND) as a process-oriented approach that sets performance standards for analyzing potential impacts and for identifying and implementing required mitigation measures.

This chapter introduces the project proponent, the lead agency, and responsible agencies; defines the scope of this Last Mile IS/MND; outlines how the unique aspects of this project are analyzed under the California Environmental Quality Act (CEQA); and discusses the subsequent process for authorizing specific Last Mile routes.

1.1 Project Proponent and Agencies

1.1.1 Project Proponent

On July 6, 2000, the CPUC approved IPN as a Limited Facilities-Based Competitive Local Carrier. On January 3, 2001, IPN applied to the CPUC for a CPCN requesting authorization to expand its authority to operate as a Full Facilities-Based Competitive Local Carrier and Inter-Exchange Carrier (Application No. 01-03-006). The authority being sought under this proceeding would enable IPN to undertake new construction projects consistent with the activities and methods described in chapter 2, "Project Description" (see page 2-1).

IPN's targeted market areas will be developed in three phases. In Phase 1 (the purpose of this application), IPN intends to provide Last Mile services in the San Francisco Bay Area and Sacramento metropolitan areas. CPUC authorization for Phases 2 and 3 will be sought at a later date.

1.1.2 Lead Agency

CEQA applies to discretionary government activities that are defined as projects and have the potential to result in either a direct or indirect physical change in the environment. An activity is considered a project if it requires issuance of a lease, permit, license, certificate, or other entitlement by a public agency. The CPUC is designated CEQA lead agency for approval of this project under CEQA by virtue of its discretionary authority to issue a CPCN, as requested by IPN (State CEQA Guidelines Sec. 15378(a); California Public Resources Code [PRC] sec 21065). The CPUC's objective is to prepare a document that will set forth processes to ensure compliance pursuant to CEQA (PRC 21000 et seq.), the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and CPUC CEQA Rule 17.1, "Special Procedure for Implementation of CEQA."

Because the CPUC is a state agency and the project is of statewide importance, this IS/MND will be sent to the State Clearinghouse for a 30-day public review period. The CPUC will consider the IS/MND, together with any comments received, before approving the project and issuing the CPCN (PRC sec 21091(f)).

1.1.3 Responsible Agencies

The proposed action would occur in several jurisdictions and require approvals and permits from various state and local agencies (city, county, regional). These agencies may be considered *responsible agencies* under CEQA. A responsible agency is an agency other than the lead agency that has a legal responsibility for approving a project. The responsible agency must actively participate in the lead agency's CEQA process by reviewing the document and using it for the approval of the project. The responsible agency may also use this IS/MND to achieve CEQA compliance when issuing permits (i.e., encroachment permit) required to authorize each specific project route. In addition, the responsible agency may require additional permit conditions.

1.2 CEQA Compliance and Scope of this Last Mile Initial Study/Mitigated Negative Declaration

IPN's proposed Last Mile project consists of the installation of fiber optic cable from the nearest existing fiber optic line to the customer, as customers request it. This Last Mile IS/MND identifies the potential environmental effects of this activity, sets performance standards, and provides mitigation and a compliance

process for avoiding or reducing potentially significant impacts to less-than-significant levels.

The document analyses the significance of potential impacts from construction, maintenance, and operation of the proposed project; and identifies the mitigation measures or processes needed to avoid or reduce each potential impact to a less-than-significant level. Project construction would be confined to the geographic urban study areas described in the project description (chapter 2) and evaluated in this document. No unauthorized construction requiring CEQA review would be permitted in areas beyond the scope of this study and outside the urban study areas. The specific environmental issues analyzed in this IS/MND include all topics in the environmental checklist form presented in Appendix G of the State CEQA Guidelines (Section 15063).

The objective of this IS/MND is to establish a clear process for implementing mitigation measures and ensuring mitigation and local permit compliance. The mitigation measures include sufficient detail to enable IPN to avoid or reduce all potentially significant impacts associated with the construction activity.

The following textbox gives an overview of the objectives and the limits of this Last Mile IS/MND:

This Last Mile IS/MND

Does:

- Ensure CEQA compliance for CPUC (lead agency) to approve the project and issue a facilities-based CPCN.
- Ensure CEQA compliance for responsible agencies issuing permits and approvals for future specific project routes.
- Provide the process for determining appropriate mitigation measures and monitoring once a specific route is identified.

Does NOT:

- Provide the applicant with unauthorized blanket approval to install cable anywhere in the urban study area.
- Provide CEQA compliance for unauthorized projects outside the urban study area identified.
- Limit the authority of the responsible agencies issuing permits and approvals for future specific project routes.

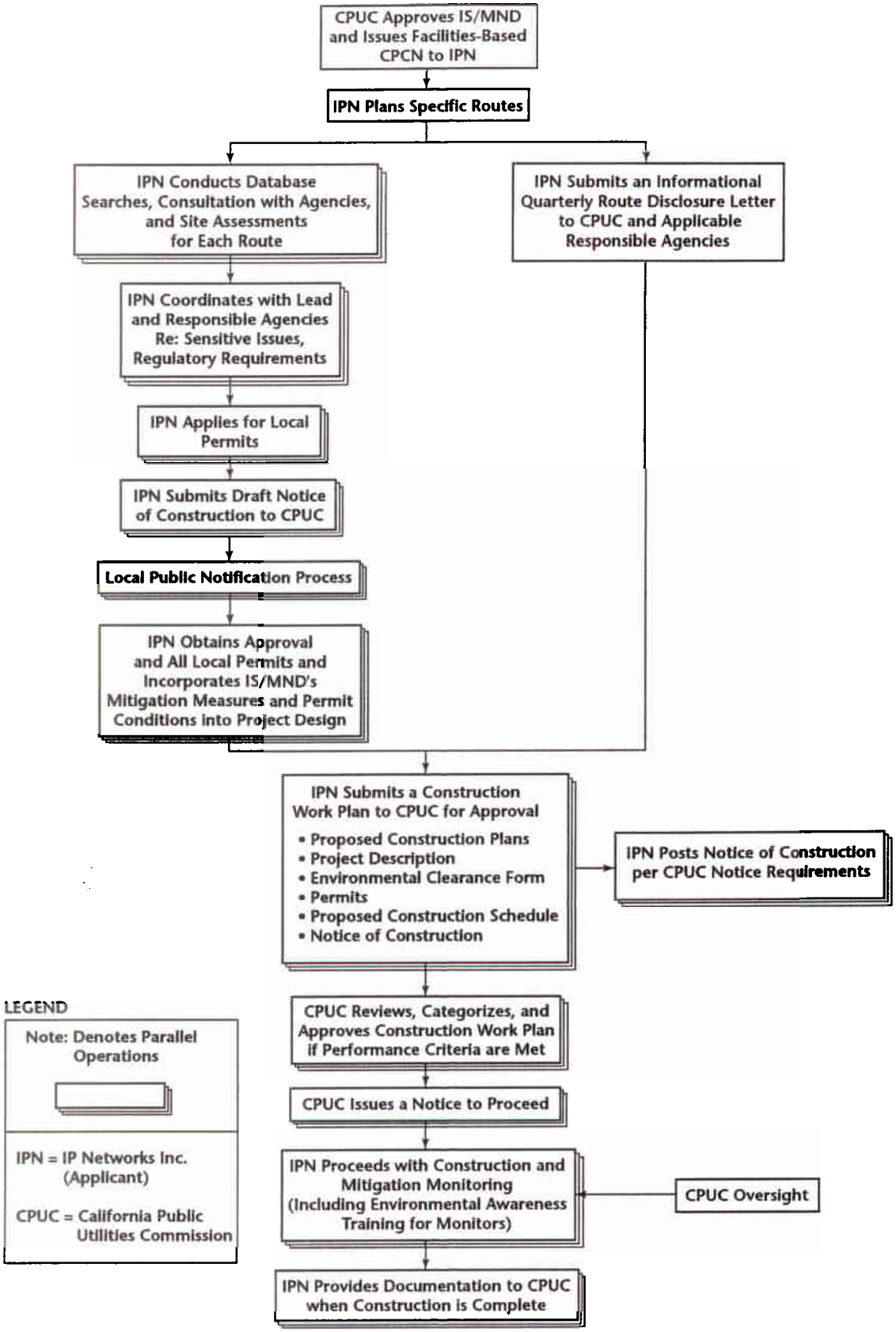
1.3 Identification and Approval of Specific Project Routes

Following the CEQA process, IPN will prepare informational-only quarterly route disclosure letters, which identify specific project routes within the urban study area identified in this IS/MND. These quarterly reports will be submitted to the CPUC and to affected agencies upon request. A process to identify required mitigation measures for each specific project route is specifically

addressed in the Mitigation Monitoring Compliance and Reporting Plan (MMCRP) included in appendix A of this document, and is summarized in the flow diagram in figure 1. This process is designed to ensure that resource impacts are properly studied and mitigated; that all route-specific permits and approvals are acquired from responsible agencies and conditions included are followed; and that proper public notice and formal notice of construction occur prior to the CPUC issuing a Notice to Proceed for each specific project route in the urban study areas identified in this document.

This Last Mile IS/MND and MMCRP also document the process for achieving compliance with various state and federal requirements (i.e., federal Endangered Species Act [ESA], Clean Water Act [CWA], National Historic Preservation Act [NHPA]). However, compliance may require additional activities not documented in this IS/MND, such as preparation of a cultural resources inventory report in compliance with the NHPA, because the requirements may not be known until the field surveys are conducted as part of the MMCRP.

For each specific project, IPN will be required to prepare a construction work plan (see outline and forms in appendix B) in compliance with the MMCRP to be reviewed and approved by the CPUC. The CPUC will authorize project construction only after the construction work plan has been deemed complete. Figure 1 outlines the steps necessary to obtain the CPUC's authorization for construction.



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Jones & Stokes

Figure 1
Subsequent Approval Process for Specific Routes

(END OF ATTACHMENT A)

California Public Utility Commission

Mitigated Negative Declaration

1. **Project Title:** IP Networks, Inc. Last Mile Fiber Optic Cable Installation Project

2. **Lead Agency Name and Address:** California Public Utilities Commission
Energy Division-Analysis Branch
505 Van Ness Avenue
San Francisco, CA 94102

3. **Contact Person and Phone Number:** Jensen Uchida, Regulatory Analyst
415-703-5484

4. **Project Location:** San Francisco Bay Area and Sacramento Metropolitan urban areas

5. **Project Sponsor's Name and Address:** IP Networks, Inc.
30 Corporate Park, Suite 300
Irvine, CA 92606

6. **General Plan Designation:** Not applicable

7. **Zoning:** Not applicable

8. **Description of Project:** IP Networks proposes to offer Last Mile telecommunications service in urban areas, within the San Francisco Bay Area and Sacramento Metropolitan area, to various entities (their clients) by constructing new fiber optic cable facilities and ancillary equipment between structures to which the service would be provided. The term Last Mile refers to the distance between the source facility and the new customer. Installation locations and methods include: use of existing dark fiber Unbundled Network Element; use of existing conduits, ducts, and rights-of-way of existing utilities and other companies for installation of new fiber optic cable; obtain pole attachment rights to authorize installation of fiber optic cable on existing utility structures; construct new underground conduit in existing public and utility rights-of-way; and construct new central offices.

   IP Networks has not identified all customers and therefore did not list specific construction locations at the time of submittal of their application for the Certificate of Public Convenience and Necessity (CPCN). Because it is not possible to exactly identify the location of each potential customer, the project has no preplanned routes. To adapt to this type of project, the California Public Utilities Commission (CPUC) developed the Last Mile initial study/mitigated negative declaration (IS/MND) as a process-oriented approach that sets performance standards for analyzing potential impacts and for identifying and implementing required mitigation measures. Because the specific locations are

not known, the Last Mile initial study takes the conservative approach of presenting all possible impacts and the required mitigation measures. This process provides CEQA compliance for CPUC and responsible agencies, but does not limit the authority of the responsible agencies issuing permits and approvals for future specific project routes.

9. **Surrounding Land Uses and Setting:** Construction of new fiber optic cable facilities and ancillary equipment along multiple routes and at selected locations in the San Francisco Bay Area and Sacramento Metropolitan urban areas. See table 2-1 in chapter 2, "Project Description," for details.

10. **Other Public Agencies whose Approval Is Required:** See section 2.2 in chapter 2, "Project Description," for details.

Environmental Factors Potentially Affected:

The environmental factors checked below would potentially be affected by this project (i.e., the project would involve at least one impact that is a "Potentially Significant Impact"), as indicated by the checklist in chapter 4 of the attached initial study.

[X] Aesthetics	[ ] Agricultural Resources	[X] Air Quality
[X] Biological Resources	[X] Cultural Resources	[X] Geology/Soils
[X] Hazards and Hazardous Materials	[X] Hydrology/Water Quality	[X] Land Use/Planning
[ ] Mineral Resources	[X] Noise	[ ] Population/Housing
[ ] Public Services	[X] Recreation	[X] Transportation/Traffic
[X] Utilities/Service Systems	[X] Mandatory Findings of Significance	

To ensure that any potential environmental impacts will not be significant, the applicant will follow the "subsequent approval process for specific routes" and will incorporate mitigation measures into the project design or as conditions of approval. See attached figure and table.

Findings:

Based on the findings of the initial study and implementation of the mitigation measures identified therein, the project would not:

- degrade the quality of the environment, substantially reduce the habitat of 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 California history or prehistory;

- achieve short-term, to the disadvantage of long-term, environmental goals;

- have impacts that are individually limited, but cumulatively considerable; and

- have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Determination:

The CPUC has reviewed the proposed project and has determined that the project, based on the initial study attached hereto, will not have a significant effect on the environment. An environmental impact report is not required pursuant to the California Environmental Quality Act of 1970. This environmental review process and negative declaration is done in accordance with CEQA (PRC 21000 et seq.), the State CEQA Guidelines (14 CCR 15000 et seq.), and CPUC CEQA Rule 17.1, "Special Procedure for Implementation of CEQA."

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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 to 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 an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Signature	Date
Printed Name	Title

Impacts	Mitigation Measures
	Aesthetics
AES-1: Adverse effect on a scenic vista or damage to a scenic resource	**AES-MM-1:** Identify scenic resources within 1,500 feet of the proposed alignment and locate all permanent substantial aboveground features 1,000 feet away from scenic resources
AES-2: Possible visual effect resulting from construction of central offices	**AES-MM-2:** Review and comply with local planning documents, zoning, and other ordinances regarding utility lines and buildings
AES-3: Possible light and glare effect resulting from construction of central offices	**AES-MM-3:** Use non-reflective material and directed lighting fixtures for all central offices
	Agricultural Resources
None	None
	Air Quality
AIR-1: Temporarily increased levels of air pollutants during construction exceeding air district thresholds	**AIR-MM-1:** Implement construction BMPs to reduce dust and air emissions **AIR-MM-2:** Obtain air permit
AIR-2: Temporary emissions exceeding limits from operating emergency backup generators	**AIR-MM-3:** Obtain authority to construct and permit to operate emergency backup generators, where required
	Biological Resources
BIO-1: Potential disturbance of special-status plant populations	**BIO-MM-1:** Retain a qualified botanist to conduct botanical surveys and document special-status plant populations **BIO-MM-2:** Avoid impacts on state- and federally listed and CNPS 1b special-status plant populations by establishing and observing exclusion zones **BIO-MM-3:** Avoid impacts on CNPS Lists 2 and 4 special-status plant populations by implementing specific measures **BIO-MM-4:** Confine construction equipment and associated activities to the designated work area

Continued

Impacts	Mitigation Measures
	BIO-MM-5: Retain qualified biologists and resource specialists to monitor construction activities near specified sensitive biological areas
	BIO-MM-6: Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction
BIO-2: Potential introduction of new noxious weeds or spread of existing noxious weed	**BIO-MM-7:** Conduct a noxious-weed survey and document noxious-weed infestation
	BIO-MM-8: Avoid the dispersal of noxious weeds into uninfested areas
BIO-3: Potential disturbance of special-status wildlife species	**BIO-MM-9:** Retain a qualified wildlife biologist to conduct a habitat assessment for special- status wildlife species
	BIO-MM-4: Confine construction equipment and associated activities to the project routes in areas that support sensitive resources
	BIO-MM-5: Retain qualified biologists or resource specialists to monitor construction activities near specified sensitive biological areas
	BIO-MM-6: Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction
	BIO-MM-10: Avoid impacts on vernal pool habitats by establishing and observing exclusion zones around vernal pools and hydrologically connected areas
	BIO-MM-11: Avoid disturbance to elderberry shrubs by establishing and observing exclusion zones
	BIO-MM-12: Avoid riparian and wetland habitats that support non-listed special-status species by establishing and observing exclusion zones
	BIO-MM-13: Avoid disturbing active special-status raptor nests by establishing exclusion zones during the breeding season or constructing during the non-breeding season

Continued

Impacts	Mitigation Measures
	BIO-MM-14: Avoid disturbing active Swainson's hawk nests by establishing and observing buffer zones
	BIO-MM-15: Avoid disturbing active burrowing owl nests and implement standard DFG guidelines during the non-breeding season
	BIO-MM-16: Avoid San Joaquin kit fox dens by conducting preconstruction searches and rerouting around occupied habitat
	BIO-MM-17: Avoid disturbance to nesting cliff swallows by implementing timing restrictions and removing unoccupied nests
	BIO-MM-18: Avoid roosting bats by postponing bridge attachments on bridges that support roosting sites
	BIO-MM-19: Avoid impacts on state and federally listed wildlife species by rerouting around habitat areas
	BIO-MM-20: Fill or cover open trenches daily
BIO-4: Potential construction-related impacts on threatened, endangered, and other special-status fish species	**BIO-MM-21:** Retain a qualified fisheries biologist to identify streams and assess habitat for threatened, endangered, and other special-status fish species
	BIO-MM-22: Prepare and implement a storm water pollution prevention plan outlining BMPs for construction activities
	BIO-MM-23: Avoid in-water construction in all flowing streams that have the potential to support threatened, endangered, and other special-status fish species
	BIO-MM-4: Confine construction equipment and associated activities to the project routes in areas that support sensitive resources
	BIO-MM-5: Retain qualified biologists or resource specialists to monitor construction activities near specified sensitive biological areas
	BIO-MM-6: Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction

Continued

Impacts	Mitigation Measures
	BIO-MM-24: Avoid and minimize disturbance of woody riparian vegetation along drainages **BIO-MM-25:** Conduct postconstruction monitoring in woody riparian and wetland communities that are substantially disturbed during construction activities
BIO-5: Potential removal or disturbance of woody riparian vegetation	**BIO-MM-26:** Identify and document woody riparian habitat **BIO-MM-4:** Confine construction equipment and associated activities to the project routes in areas that support sensitive resources **BIO-MM-5:** Retain qualified biologists or resource specialists to monitor construction activities near specified sensitive biological areas **BIO-MM-6:** Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction **BIO-MM-12:** Avoid riparian and wetland habitats that support non-listed special-status species by establishing and observing exclusion zones **BIO-MM-24:** Avoid and minimize disturbance of woody riparian vegetation along drainages **BIO-MM-25:** Conduct postconstruction monitoring in woody riparian and wetland communities that are disturbed during construction activities
BIO-6: Potential short-term disturbance of waters of the United States (including wetland communities)	**BIO-MM-27:** Identify and delineate waters of the United States (including wetlands) **BIO-MM-4:** Confine construction equipment and associated activities to the project routes in areas that support sensitive resources **BIO-MM-5:** Retain qualified biologists or resource specialists to monitor construction activities near specified sensitive biological areas **BIO-MM-6:** Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction

Continued

Impacts	Mitigation Measures
	BIO-MM-25: Conduct postconstruction monitoring in woody riparian and wetland communities that are disturbed during construction activities **BIO-MM-28:** Minimize disturbance and restore other waters of the United States to pre-project conditions **BIO-MM-29:** Minimize disturbance and restore jurisdictional wetlands to preproject conditions **BIO-MM-30:** Avoid and protect specified jurisdictional wetlands adjacent to construction areas
BIO-7: Potential temporary disturbances to wildlife movements	**BIO-MM-12:** Avoid riparian and wetland habitats that support non-listed special-status species by establishing and observing exclusion zones
BIO-8: Potential temporary increases in sedimentation and turbidity resulting in the interference of migratory fish habitat	**BIO-MM-4:** Confine construction equipment and associated activities to the project routes in areas that support sensitive resources **BIO-MM-5:** Retain qualified biologists or resource specialists to monitor construction activities near specified sensitive biological areas **BIO-MM-6:** Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction **BIO-MM-21:** Retain a qualified fisheries biologist to identify streams and assess habitat for threatened, endangered, and other special-status fish species **BIO-MM-22:** Prepare and implement a stormwater pollution prevention plan outlining BMPs for construction activities **BIO-MM-24:** Avoid and minimize disturbance of woody riparian vegetation along drainages **BIO-MM-25:** Conduct postconstruction monitoring in woody riparian and wetland communities that are substantially disturbed during construction activities

Impacts	Mitigation Measures
	BIO-MM-28: Minimize disturbance and restore other waters of the United States to preproject conditions
BIO-9: Potential conflict with local policies or ordinances protecting biological resources	**BIO-MM-31:** Review local city and county policies, ordinances and conservation plans, and comply with requirements
BIO-10: Potential conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan	**BIO-MM-31:** Review local city and county policies, ordinances and conservation plans, and comply with requirements
Cultural Resources	
CUL-1: Potential disturbance of cultural resource sites	**CUL-MM-1:** Complete a cultural resource inventory of the proposed project study area and determine methods to avoid impacts on potentially significant cultural resource sites **CUL-MM-2:** Conduct test excavation to determine resource significance, and if significant, conduct data recovery excavation
CUL-2: Potential for ground-disturbing activities to damage unidentified buried cultural resource sites	**CUL-MM-3:** Stop work if cultural resources are discovered during ground-disturbing activities
CUL-3: Potential for indirect impacts on historic structures associated with placing central office buildings	**CUL-MM-4:** Place central office buildings to avoid impacts on the setting of significant and potentially significant historic resources
CUL-4: Potential for proposed project activities to damage previously unidentified human remains on non-federal land	**CUL-MM-5:** Comply with state laws pertaining to the discovery of human remains
Geology, Seismicity, and Soils	
GEO-1: Possible temporary accelerated erosion and sedimentation from soil disturbance and vegetation removal	**BIO-MM-22:** Prepare and implement storm water pollution prevention plan outlining BMPs for construction activities

Continued

Impacts	Mitigation Measures
Hazards and Hazardous Materials	
HAZ-1: Possible release of hazardous materials during construction	**BIO-MM-22:** Prepare and implement storm water pollution prevention plan outlining BMPs for construction activities **HAZ-MM-1:** Ensure proper labeling, storage, handling, and use of hazardous materials **HAZ-MM-2:** Report all significant releases or threatened releases of hazardous materials
HAZ-2: Possible discovery and accidental release of buried and unknown hazardous waste	**HAZ-MM-3:** Avoid known hazardous waste and contamination sites **HAZ-MM-4:** Report all discovery of hazardous waste, including soil and groundwater contamination, to the local hazardous materials response agency
HAZ-3: Possible exposure of the public or environment to hazardous materials sites	**HAZ-MM-3:** Avoid known hazardous waste and contamination sites **HAZ-MM-4:** Report all discovery of hazardous waste, including soil and groundwater contamination, to the local hazardous materials response agency
HAZ-4: Possible safety hazard due to helicopter or other aircraft in the vicinity of public or public-use airport	**HAZ-MM-5:** Undertake all flight operations in accordance with federal air administration safety and flight regulations
HAZ-5: Possible temporary limited emergency access	**HAZ-MM-6:** Prepare and implement a traffic safety plan, and coordinate with local transportation and emergency response agencies
HAZ-6: Possible temporary exposure of people or structures to wildland fires	**HAZ-MM-7:** Prepare a fire prevention and management plan
Hydrology and Water Quality	
HYD-1: Possible increase in sediment-loading into waterbodies as a result of project construction	**BIO-MM-5:** Retain qualified biologists and resource specialists to monitor construction activities near specified sensitive biological areas **BIO-MM-6:** Conduct a biological-resource education program for construction crews and enforce construction restrictions before construction

Continued

Impacts	Mitigation Measures
	BIO-MM-12: Avoid riparian and wetland habitats that support non-listed special-status species by establishing and observing exclusion zones **BIO-MM-22:** Prepare and implement storm water pollution prevention plan outlining BMPs for construction activities. **BIO-MM-1:** Ensure proper labeling, storage, handling, and use of hazardous materials **HYD-MM-1:** Employ non-invasive construction methods at stream crossings
HYD-2: Possible temporary degraded water quality from accidental spills of hazardous materials during construction in exceedance of reportable quantities	**BIO-MM-22:** Prepare and implement storm water pollution prevention plan outlining BMPs for construction activities **HAZ-MM-1:** Ensure proper labeling, storage, handling, and use of hazardous materials
HYD-3: Possible temporary water quality degradation from discharge of directional drilling slurry into waterbodies	**HYD-MM-2:** Integrate directional drilling slurry containment protocol into SWPPP or BMPs documentation as initially described in mitigation measure BIO-MM-22 **HYD-MM-3:** Inform governing agencies of the selected directional-drilling slurry to be used for directional drills **BIO-MM-5:** Retain qualified biologists and resource specialists to monitor construction activities near specified sensitive biological areas **BIO-MM-6:** Conduct a biological resource education program for construction crews and enforce construction restrictions before construction **BIO-MM-12:** Avoid riparian and wetland habitats that support non-listed special-status species by establishing and observing exclusion zones **BIO-MM-22:** Prepare and implement storm water pollution prevention plan outlining BMPs for construction activities **HAZ-MM-1:** Ensure proper labeling, storage, handling, and use of hazardous materials

Continued

Impacts	Mitigation Measures
HYD-4: Possible increased flood hazards from possible placement of central offices within the floodplain	**HYD-MM-4:** Design central offices to comply with floodplain ordinances
Land Use and Planning	
LAN-1: Potential inconsistency with county, city, or local land use plans and policies	**AES-MM-2:** Review and comply with local land use plans, policies, zoning, and other ordinances
LAN-2: Potential inconsistency with conservation plan	**BIO-MM-12:** Avoid riparian and wetland habitats that support non-listed special-status species by establishing and observing exclusion zones
Mineral Resources	
None	None
Noise	
NOI-1: Temporary exposure of residences and other sensitive receptors to construction noise in excess of local standards	**NOI-MM-1:** Employ noise-reducing construction practices
NOI-3: Exposure of nearby sensitive receptors to excessive noise levels from use of emergency backup generators and other support equipment at central offices	**NOI-MM-2:** Design and locate emergency backup generators and other support equipment to limit noise from the engine generator
Population and Housing	
None	None
Public Services	
None	None
Recreation	
REC-1: Use of recreational facilities as staging or other work area	**REC-MM-1:** Avoid impacts on recreational facilities

Continued

Impacts	Mitigation Measures
Transportation/Traffic	
TRA-1: Potential for roadway safety hazards	**HAZ-MM-6:** Prepare and implement a traffic safety plan and coordinate with local transportation and emergency response agencies
TRA-2: Temporary inadequate access to areas along the project alignment resulting from construction-related and operation maintenance activities	**HAZ-MM-6:** Prepare and implement a traffic safety plan and coordinate with local transportation and emergency response agencies
TRA-3: Increased parking demand created by construction activities	**TRA-MM-1:** Limit all parking to right-of-way and pre-approved staging areas
Utilities and Service Systems	
UTI-1: Potential damage to subsurface utilities during trenching	**UTI-MM-1:** Determine the location of subsurface utilities and avoid during construction activities
UTI-2: Generation of solid waste resulting from construction activities	**UTI-MM-2:** Recycle and dispose of construction materials

(END OF ATTACHMENT B)