

# **DIGITAL 299 BROADBAND PROJECT**

## **Addendum to Final Environmental Assessment and Initial Study/Mitigated Negative Declaration**

SCH # 2022010017

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## TABLE OF CONTENTS

1.0	Introduction .....	1
1.1.	Background.....	1
1.2.	California Environmental Quality Act Compliance .....	1
2.0	Description of Project Modification .....	2
2.1.	Alignment Change .....	2
2.2.	Disturbance.....	5
2.3.	Construction Schedule.....	6
2.4.	Permits and Approvals.....	6
3.0	Environmental Analysis .....	6
3.1.	Aesthetics .....	6
3.2.	Agriculture and Forestry Resources .....	7
3.3.	Air Quality .....	9
3.4.	Biological Resources .....	10
3.5.	Cultural Resources .....	11
3.6.	Energy .....	13
3.7.	Geology and Soils.....	13
3.8.	Greenhouse Gas Emissions .....	16
3.9.	Hazards and Hazardous Materials .....	16
3.10.	Hydrology and Water Quality.....	18
3.11.	Land Use and Planning .....	20
3.12.	Mineral Resources.....	21
3.13.	Noise.....	21
3.14.	Population and Housing.....	22
3.15.	Public Services .....	23
3.16.	Recreation .....	24
3.17.	Transportation.....	25
3.18.	Tribal Cultural Resources .....	25
3.19.	Utilities and Service Systems .....	27
3.20.	Wildfire.....	28
4.0	Conclusion .....	29
5.0	References .....	30

## LIST OF FIGURES

Figure 1 Proposed Alignment.....	4
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## ***LIST OF TABLES***

Table 1 Temporary and Permanent Disturbance on Private and Caltrans Lands .....	5
Table 2 Aesthetics .....	6
Table 3 Agriculture and Forestry Resources .....	7
Table 4 Air Quality .....	9
Table 5 Biological Resources .....	10
Table 6 Cultural Resources .....	11
Table 7 Energy .....	13
Table 8 Geology and Soils .....	13
Table 9 Greenhouse Gas Emissions .....	16
Table 10 Hazards and Hazardous Materials .....	16
Table 11 Hydrology and Water Quality .....	18
Table 12 Land Use and Planning .....	20
Table 13 Mineral Resources .....	21
Table 14 Noise .....	21
Table 15 Population and Housing .....	22
Table 16 Public Services .....	23
Table 17 Recreation .....	24
Table 18 Transportation .....	25
Table 19 Tribal Cultural Resources .....	25
Table 20 Utilities and Service Systems .....	27
Table 21 Wildfire .....	28

## ***LIST OF APPENDICES***

Appendix A Initial Study

## 1.0 INTRODUCTION

### 1.1. Background

The California Public Utilities Commission (CPUC) approved a California Advanced Services Fund (CASF) infrastructure grant application for Inyo Networks, Inc. (Inyo) in March 2017, through Resolution T-17548. In September 2020, Inyo sent a letter to the Communications Division terminating the grant that was approved in the Resolution. Subsequently, Vero Fiber Networks, LLC (Vero) took over the Digital 299 Fiber Optic Broadband Project ("project") without seeking CASF funding. The Commission prepared a Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the project (SCH#2022010017) pursuant to the California Environmental Quality Act (CEQA) Guidelines. The Draft IS/MND also included a Draft Environmental Assessment (Draft EA) prepared pursuant to the National Environmental Policy Act for use in permitting and project approval by federal agencies. The joint Draft EA/ISMND was circulated through the State Clearinghouse of the Office of Planning and Research for a 30-day public comment period ending in February 2022. The CPUC addressed over 60 comments from the public and state and federal agencies and finalized the document in October 2022.

On December 15, 2022, the CPUC approved Resolution T-17766, which adopted the Final EA/ISMND in compliance with CEQA and approved the issuance of a Notice to Proceed for the Digital 299 Broadband Project.

The approved environmental documents analyzed installation of approximately 300 miles of new conduit and fiber optic cables to provide internet to unserved or underserved communities in Humboldt, Trinity, and Shasta counties. The project alignment generally follows California State Route 299, with segments diverging from the highway to follow city and county roads. The project is split into two phases: phase one would include installation of underground fiber optic cables along existing roads and rights-of-way (ROWs), and up to five prefabricated in-line amplifier (ILA) buildings to support signal regeneration, distribution, and interconnect, and phase two would include aerial spurs to connect nearby communities and direct connection to public buildings such as schools and hospitals and connections to customers in the Lewiston area (referred to as the "last-mile").

Vero submitted documentation to the CPUC in November 2023 describing a modification to the project that would involve altering the alignment of the project through McKinleyville, California. This Addendum to the Final EA/ISMND (Addendum) has been prepared to evaluate the potential impacts of this project modification ("Proposed Modification"). Each federal agency issued a NEPA decision which evaluated the portion of the proposed Project which crossed their jurisdiction. As the Proposed Modification does not cross any federal jurisdiction, the CPUC has sole authority to adopt this addendum in compliance with CEQA.

### 1.2. California Environmental Quality Act Compliance

This document has been prepared in compliance with the CEQA. CEQA Guidelines §15164 provides:

- a) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.*
- b) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

CEQA Guidelines §15162 identifies the conditions that trigger the need to prepare a subsequent Environmental Impact Report (EIR) or negative declaration:

*“When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in light of the whole record that:*

- 1) Substantial changes are proposed in the project which will require major revisions of the previous...negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous...negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant impacts; or*
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous...negative declaration was adopted, shows any of the following:*
  - a. The project will have one or more significant effects not discussed in the previous...negative declaration;*
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would be substantially reduce one of more significant effects on the environment, but the project proponents declined to adopt the mitigation measure or alternative.”*

The purpose of this Addendum is to address minor modifications to the project. As described in the Addendum, the proposed project modification is not a substantial change to the project and would not result in any new significant environmental impacts or any substantial increases in the severity of previously identified impacts. The modifications do not otherwise trigger the need to prepare a subsequent EIR or negative declaration pursuant to CEQA Guidelines §15162. Therefore, the CPUC has determined that a subsequent negative declaration is not required and an Addendum to the EA/ISMND is the appropriate level of CEQA review to address the proposed changes to the project. The analysis in the Addendum provides the basis for this conclusion.

## **2.0 DESCRIPTION OF PROJECT MODIFICATION**

### **2.1. Alignment Change**

*Section 2.21 Project Location and Areas of Disturbance* of the EA/ISMND describes the project's action area across Humboldt, Trinity, and Shasta counties. At the northwestern end of the project, the EA/ISMND describes the primary route following local roads in Arcata and along the Hammond Trail. Instead, the Proponent proposes to reroute the alignment to the east, reducing the total mileage of fiber optic conduit by about 2 miles. The Proponent proposes to modify the alignment to head west along State Route (SR) 200 from the intersection with SR-299 to the intersection with Central Avenue, where the alignment will then head north to Airport Road. The

alignment will then head north along U.S. Route 101 until following an on-ramp at Clam Beach Drive, where construction will follow the previously studied alignment, which follows Clam Beach Drive, U.S. Route 101, and other local roads north to the City of Trinidad. This change in the alignment will help the State of California meet their MMBI goals by 2026 by providing future opportunities for last-mile tie-ins in downtown McKinleyville. Additionally, the alignment change will reduce the potential impacts to resources by staying in more developed areas along public right-of-way. Examples of reduced impacts include impacts to public recreation by avoiding construction on the Hammond Trail and impacts to aquatic resources by eliminating one crossing of the Mad River.

The location of the Proposed Modification is shown in **Figure 1**. The originally proposed alignment that follows Hammond Trail is shown in black on **Figure 1**).



## 2.2. Disturbance

Along the whole alignment, Vero has requested permits for a 10-foot ROW for the permanent occupation of conduit and vaults; construction of the facilities would temporarily disturb up to a 25-foot-wide corridor. *Section 2.2.21* of the EA/ISMND describes the maximum acreages of temporary disturbances (construction corridor and staging areas) and permanent disturbances (vaults and ILA buildings).

For the purposes of this document, the private jurisdiction covers land under county and city jurisdiction. Laydown areas and ILA buildings are not planned as a part of the Proposed Modification, so the associated temporary and permanent disturbances are not considered in the table below. **Table 1** shows the acreages for temporary disturbances and permanent disturbances associated with the Proposed Modification. Because the Proposed Modification would involve a change in the alignment that would avoid construction along the Hammond Trail, the total maximum disturbance would be reduced from what was included in the original EA/ISMND. The total temporary disturbance would decrease from 603.9 acres to 599.1 acres, and the total permanent disturbance would decrease from 6,928 square feet to 6,870 square feet. The reduction comes from diminishing disturbance on private lands, with temporary disturbance decreasing from 385.5 acres to 367.3 acres and permanent disturbance decreasing from 4,544 square feet to 4,336 square feet. Within Caltrans lands, the maximum disturbance increases, with temporary disturbance increasing from 218.4 acres to 231.8 acres, and permanent disturbance increasing from 2,384 square feet to 2,534 square feet.

<b>TABLE 1 TEMPORARY AND PERMANENT DISTURBANCE ON PRIVATE AND CALTRANS LANDS</b>				
	<b>Jurisdiction</b>	<b>Mileage</b>	<b>Temporary Disturbance Conduit Placement (acres)<sup>a</sup></b>	<b>Permanent Disturbance Approx. Vaults (sq feet)<sup>b</sup></b>
Original EA/ISMND 48x48 vault lids	Caltrans	72.2	218.4	2,384
	Private	142	385.5	4,544
	Total	214.2	603.9	6,928
Hammond Trail Route (being replaced) 48x48 vault lids	Caltrans	0	0	0
	Private	8.9	26.9	288
	Total	8.9	26.9	288
Proposed Modification 30x48 vault lids	Caltrans	4.4	13.4	150
	Private	2.9	8.7	80
	Total	7.3	22.1	230
Total Disturbance with Proposed Modification (Original – Hammond + Proposed)	Caltrans	76.6	231.8	2,534
	Private	136	367.3	4,336
	Total	212.6	599.1	6,870
<sup>a</sup> Equals crossing mileage x 25-foot-wide corridor <sup>b</sup> Combined acreage of surface disturbance (48-inch by 48-inch vault lids each) for approximately one vault per 0.5 mile. The original EA/ISMND that included the Hammond Trail Route estimated 48x48 vault lids, while the Proposed Modification would use 30x48 vault lids.				



## 2.3. Construction Schedule

Section 2.2.2.4 *Construction Operations* of the EA/ISMND describes the construction schedule, equipment, best management practices (BMPs), fiber optic cable marker posts, subsurface warning tape, and traffic control for the project. The middle-mile phase of the project, of which the Proposed Modification is a part, is estimated at up to 36 months with construction pacing between 500 feet and 2 miles per day, depending on terrain. Therefore, by avoiding construction of the previously approved portion along the Hammond Trail, construction of the Proposed Modification of 7 miles will have a negligible effect on the construction schedule of the project. This modification should not extend the original timeline of 36 months.

## 2.4. Permits and Approvals

Permits and approvals that may be required for the project are described in Table 1 of the EA/ISMND. The City of Trinidad and Humboldt County will review the Proposed Modification and consider issuing encroachment permits and coastal development permits for the segments of the project under each within their jurisdiction. In addition, Caltrans will consider issuing encroachment permits for locations within the State Highway right-of-way and the California Department of Fish and Wildlife will consider issuing an amendment to the Project's Master Streambed Alteration Agreement (MSAA).

## 3.0 ENVIRONMENTAL ANALYSIS

The purpose of this analysis is to evaluate the resource categories in terms of any project changes or new information of substantial importance that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect). The questions posed in the checklist come from Appendix A of the Final EA/ISMND. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with resource protection measures in the Final IS/MND.

### 3.1. Aesthetics

TABLE 2 AESTHETICS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>I. Aesthetics, Light, and Glare</i> <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	No impact	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	No impact	No	No	None

TABLE 2 AESTHETICS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	VR-1, VR-2 (Not applicable to Proposed Modification)
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No impact	No	No	None

Section I of Appendix A of the Final EA/ISMND evaluated the potential visual impacts from the installation of the aboveground and underground project facilities and determined the project would have a less than significant impact on aesthetics. The rerouted 7 miles would be located primarily underground and within already developed transportation corridors and would consequently cause no long-term change to the visual character of the surrounding landscape. The Proposed Modification does not include installation of new ILA buildings, and any aboveground conduit and fiber would be attached to existing bridges. It would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts upon the environment.

### 3.2. Agriculture and Forestry Resources

TABLE 3 AGRICULTURE AND FORESTRY RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
II. <i>Agricultural and Forest Resources</i> <i>Would the project:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland	No impact	No	No	None

<b>TABLE 3</b> <b>AGRICULTURE AND FORESTRY RESOURCES</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact	No	No	None
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No impact	No	No	None

Section II of Appendix A of the EA/ISMND determined that the project would have no impact on agriculture and forestry resources. The project would remain within established utility or transportation corridors and/or on existing structures and would not result in a loss or conversion of farmland and forest land to non-farmland and non-forest land use. Similar to the whole project, the Proposed Modification would not intersect areas zoned as farmland in Humboldt County. Therefore, the Proposed Modification would not result in new impacts to agricultural and forestry resources.

### 3.3. Air Quality

TABLE 4 AIR QUALITY				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<b>II. Air Quality</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact	No	No	AQ-1, AQ-2, AQ-3
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	Less than significant impact	No	No	AQ-1
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact	No	No	None
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No impact	No	No	None

Section III of Appendix A of the EA/ISMND determined that the project would have less than significant impact on air quality. Installation of the rerouted 7 miles of underground conduit would result in distributed effects on air quality due to the linear nature of the Project, and small crew size. Overall, the project modification would decrease the maximum temporary disturbance on private and Caltrans lands from 603.9 acres to 599.1 acres and would not increase the number of workdays originally analyzed. All work would still occur within the 36-month construction timeline reviewed in the Final EA/ISMND. When project construction would occur near urban or suburban areas, work would typically last two to three workdays in the immediate vicinity of any sensitive receptors. The project modification would not cause any new significant impacts or increase the severity of previously identified air quality impacts with implementation of the applicant proposed measures (APMs) identified in the Final EA/ISMND.

### 3.4. Biological Resources

TABLE 5 BIOLOGICAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>IV. Biological Resources</i> <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or United States Fish and Wildlife Service?	Less than significant with Mitigation Incorporated	No	No	BIO 1-6, 8-17 (BIO 7, BIO 18-20 are not applicable to Proposed Modification due to habitat suitability)
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by CDFW or USFWS?	Less than significant with Mitigation Incorporated	No	No	BIO-3, BIO-5, BIO-6, BIO-8
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant impact	No	No	BIO-5
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	Less than significant impact	No	No	None
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No impact	No	No	None

TABLE 5 BIOLOGICAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	No impact	No	No	None

Section IV of Appendix A of the Final EA/ISMND determined that the project would have less than significant impact on biological resources with implementation of the identified APMs and mitigation measures. Eocene Environmental Group, Inc. (Eocene; formerly Transcon Environmental, Inc.) biologists analyzed the whole project alignment and a 0.25-mile buffer, known as the Action Area, for biological resources that have the potential to be affected directly or indirectly by the project. Eocene biologists also surveyed a 50-foot-wide buffer on either side of the alignment along a majority of the route, known as the survey area, for potential biological resources (Transcon, 2023).

As the project survey area did not extend the length of the Proposed Modification, Eocene completed an additional biological survey in December 2023 along the 7-mile-long Proposed Modification and a 25-foot buffer on either side, as was feasible due to the private residences and safety concerns. The area was heavily disturbed, and the vegetated portions of the Action Area contained ruderal grasses. The project modification would not result in new impacts or increase the severity of previously identified impacts to biological resources. All APMs and mitigation measures identified in the Final EA/ISMND would be implemented for the Proposed Modification to reduce potential impacts to biological resources, including nesting birds and vegetation.

### 3.5. Cultural Resources

TABLE 6 CULTURAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>V. Cultural Resources</i> <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Less than significant impact	No	No	CR 1-10 (CR-8 not applicable to Proposed Modification)

TABLE 6 CULTURAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Less than significant impact	No	No	None
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than significant impact	No	No	CR-7, CR-8 (CR-8 not applicable to Proposed Modification)

Section V of Appendix A of the Final EA/ISMND and concurrence letters from the California State Historic Preservation Officer (SHPO) to the federal agencies and from the California Department of Transportation (Caltrans) Cultural Studies Office (CSO) to Caltrans determined that the project would have a less than significant impact to cultural resources. A 0.50-mile study area along the entire project alignment was evaluated for direct and indirect effects to cultural resources (Loftus et al. 2022). Records searches were conducted at the Northwest and Northeast Information Centers of the California Historical Resources Information Center, and historical and geologic maps and information were reviewed to assess the potential for Historic-period and precontact Native American archaeological deposits. A portion of the Proposed Modification falls outside of the study area covered by the 2022 Cultural Resources Inventory Report (CRIR), therefore a supplemental records search at the Northwest Information Center (NWIC) was conducted.

The Proposed Modification falls outside the project area previously surveyed for cultural resources. In November 2023, an intensive pedestrian survey of the Proposed Modification's ROW and a 100-foot-wide buffer was performed, and an inventory report was prepared (Thompson, 2024). The survey identified a total of two cultural resources, comprising one resource previously identified in the 2022 CRIR, and one newly recorded resource.

All resources will be avoided by the recommended construction method. Because this Proposed Modification falls partially within the Caltrans jurisdiction, supplemental consultation with the is being conducted. A monitoring plan will be developed for portions of the alignment that are considered to have increased probability for buried cultural deposits.

The Proposed Modification would implement the APMs for cultural resources identified in the Final EA/ISMND, including measures for discovery of buried resources or human remains. The rerouted segment would not result in a new significant impact or increased severity of impacts to cultural resources.

### 3.6. Energy

TABLE 7 ENERGY				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>VI. Energy</i> <i>Would the project:</i>				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	No impact	No	No	None
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No impact	No	No	None

Section VI of Appendix A of the Final EA/ISMND determined the project would have no impact on energy. Similarly, the Proposed Modification would require a negligible additional amount of fuel to operate machinery and vehicles. Therefore, the Proposed Modification would create no new impact.

### 3.7. Geology and Soils

TABLE 8 GEOLOGY AND SOILS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>VII. Geology and Soils</i> <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Less than significant impact	No	No	None
i) Rupture of a known earthquake fault, as delineated on the most	No impact	No	No	None



<b>TABLE 8 GEOLOGY AND SOILS</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to the Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?	No impact	No	No	None
iii) Seismic-related ground failure, including liquefaction?	No impact	No	No	None
iv) Landslides?	Less than significant impact	No	No	None
b) Result in a substantial soil erosion or the loss of topsoil?	Less than significant impact	No	No	None
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than significant impact	No	No	None
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	No impact	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No impact	No	No	None

TABLE 8 GEOLOGY AND SOILS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Less than significant impact	No	No	None

Section VII of Appendix A of the Final EA/ISMND determined the project would have a less than impact upon geology and soils. The project area crosses several mapped faults as described under the 1972 Alquist-Priolo Earthquake Fault Zoning Act. However, the construction of a buried conduit and fiber line is at a minimal risk due to rupture of an earthquake fault.

The Final EA/ISMND identified the primary geologic hazard for the project as the risk of landslide due to the alignment running adjacent to slopes and through areas of mapped landslides. The Proposed Modification would not expose people and structures to additional risk as it will be placed within an already cut and filled roadbed.

The Proposed Action and whole project involve the removal and replacement of a minimal amount of topsoil. The impacts would be short-term and minor as the soil would be removed, stored temporarily, and used to backfill the trench. Vero plans to utilize the Horizontal Directional Drilling construction method along the Proposed Modification, which would limit surface disturbance to bore pits. The bore pits would likely be 4 feet by 4 feet with a maximum depth of 4.5 feet deep to be dug every 800-1500 feet. Erosion control BMPs will be placed according to the measures in Appendix G of the Final EA/ISMND and the Restoration Plan.

The San Diego Natural History Museum prepared a Paleontological Resources Technical Report for the whole project and found that project areas intersect areas with high and moderate Potential Fossil Yield Classification (PFYC). The report analyzed the alignment and a 0.50-mile-wide buffer, so the Proposed Action was evaluated in the report. The Proposed Action falls within PFYC 3 or 4 area, so paleontological monitoring will occur as described in the Paleontological Monitoring and Discovery Plan. The Proposed Modification would not cause a new impact or increase the severity of impacts to geology and soils, including landslide risk, topsoil loss, and paleontological resources.

### 3.8. Greenhouse Gas Emissions

TABLE 9 GREENHOUSE GAS EMISSIONS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>VIII. Greenhouse Gas Emissions Would the project:</i>				
a) Generate greenhouse gas emissions, directly or indirectly, that may have a significant impact on the environment?	Less than significant impact	No	No	None
b) Conflict with an applicable plan, policy, or regulation adopt evidence of a known fault? Refer to the Division of Mines and Geology Special Publication 42.	No	No	No	None

Section VIII of the Final EA/ISMND determined the project would not generate greenhouse gas emissions that may have a significant impact on the environment nor conflict with an applicable plan, policy, or regulation for the purpose of reducing greenhouse gases. The whole project is anticipated to generate an estimated total of 14,500 metric tons of greenhouse gas as carbon dioxide equivalent over the multiple years of construction. Construction for the Proposed Modification should not increase the number of days worked or change the time that vehicles and equipment will be operated, and therefore should not increase greenhouse gas production. The North Coast United Air Quality Management District does not have CEQA thresholds or reporting thresholds for mobile source emissions. Therefore, the Proposed Action will not cause a new significant impact or increase in severity of an impact previously identified in the Final EA/ISMND.

### 3.9. Hazards and Hazardous Materials

TABLE 10 HAZARDS AND HAZARDOUS MATERIALS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>IX. Hazards and Hazardous Materials Would the project:</i>				
a) Create a significant hazard to the public or environment through routine transport, use, or	Less than significant impact	No	No	HZ-1, BIO-23

**TABLE 10  
HAZARDS AND HAZARDOUS MATERIALS**

<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
disposal of hazardous materials?				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant impact	No	No	HZ-1, BIO-23
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	Less than significant impact	No	No	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would create a significant hazard to the public or the environment?	No impact	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No impact	No	No	None
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact	No	No	None

TABLE 10 HAZARDS AND HAZARDOUS MATERIALS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
g) Expose people or structures, either directly or indirectly, to a significant risk, loss, injury, or death involving wildland fires?	Less than significant impact	No	No	None

Section IX of Appendix A of the Final EA/ISMND evaluated the use of hazardous materials such as gasoline, diesel fuel, hydraulic oils, equipment coolants, and waste and determined the project would have less than significant impact. The reroute of the 7-mile alignment would result in a negligible increase in the quantity of hazardous materials used during construction activities due to the labor necessary.

The Proposed Modification would not pass through any listed hazardous materials sites. The Proposed Modification is located within 2 miles of the California Redwood Coast-Humboldt County Airport; however, it would have no direct impact on the facilities. The noise analysis in the EA (Section 3.8) shows that the Project would not result in excessive noise, and construction activities with BMPs would pose no safety hazards for people residing and working in the area.

Similar to the whole project, the Proposed Action would not impair implementation or interfere with an adopted emergency response plan during the operational phase. During the construction phase, traffic control plans and other BMPs would be implemented to manage traffic flow and give emergency vehicles immediate passage around and/or through construction sites. The project modification would not create a new impact or increase the severity of impacts from hazardous materials with implementation of the APMs identified in the Final EA/ISMND.

### 3.10. Hydrology and Water Quality

TABLE 11 HYDROLOGY AND WATER QUALITY				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>X. Hydrology and Water Quality</i> <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or	Less than significant impact	No	No	HYD 1-5, BIO-22-24, HZ-1

<b>TABLE 11 HYDROLOGY AND WATER QUALITY</b>				
<b>Environmental Issue</b>	<b>Conclusion in Appendix A of the Final EA IS/MND</b>	<b>Do the Proposed Changes Involve New or More Severe Impacts?</b>	<b>New Circumstances or Information Requiring New Analysis or Verification?</b>	<b>Applicant Proposed Measures</b>
otherwise substantially degrade the surface or ground water quality?				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No impact	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant impact	No	No	None
i) result in a substantial erosion or siltation on- or off-site;	Less than significant impact	No	No	None
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact	No	No	None
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less than significant impact	No	No	None
iv) impede or redirect flood flows?	Less than significant impact	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No impact	No	No	None

TABLE 11 HYDROLOGY AND WATER QUALITY				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No impact	No	No	None

Section X of Appendix A of the Final EA/ISMND evaluated the potential direct and indirect, short-term, minor impacts to surface waters near the project.

The Proposed Modification limits impact to waterways by using the HDD construction method under every waterway and attaching conduit to bridges when possible.

The Proposed Modification has some areas within flood hazard, tsunami, or seiche zones, but inundation would not risk the release of pollutants. With implementation of the project-wide Stormwater Pollution Prevention Plan (SWPPP) and other BMPs, the Proposed Modification would avoid impacts to run-off and stormwater drainage systems.

The project modification would not cause a new impact or increase the severity of impacts to water quality with implementation of the project-wide Horizontal Directional Drilling Frac-out Contingency Plan, SWPPP, and the APMs in the Final EA/ISMND.

### 3.11. Land Use and Planning

TABLE 12 LAND USE AND PLANNING				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XI. Land Use and Planning</i> <i>Would the project:</i>				
a) Physically divide an established community?	No impact	No	No	None
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No impact	No	No	None

Section XI of Appendix A of the Final EA/ISMND determined the project would have no impact on land use and planning. Because the Proposed Modification is within the established utility and transportation corridor and does not conflict with any land use plan, policy, or regulation, the Proposed Modification would not create a new impact.

### 3.12. Mineral Resources

TABLE 13 MINERAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XII. Mineral Resources Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No impact	No	No	None
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No impact	No	No	None

Section XII of Appendix A of the Final EA/ISMND determined that the project would have no impact on mineral resources. Because the Proposed Modification is also within an existing transportation corridor on a residential street, there would be no new impact to mineral resources.

### 3.13. Noise

TABLE 14 NOISE				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XIII. Noise Would the project:</i>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in	Less than significant impact	No	No	NOI 1-3



TABLE 14 NOISE				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?				
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	Less than significant impact	No	No	None
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact	No	No	None

Section XIII of the Final EA/ISMND determined that the project would not result in noise levels that would generate a substantial temporary increase in ambient noise levels. Noise impacts from construction would typically last no longer than two to three days at a single location and would be restricted to daytime hours. The equipment used for construction of the Proposed Modification would be the same equipment analyzed in the Final EA/ISMND.

The modification should not increase the number of workdays during which noise associated with construction is generated. The proposed modification would not result in a new impact or increase to the severity of noise impact with implementation of the APMs identified in the Final EA/ISMND.

### 3.14. Population and Housing

TABLE 15 POPULATION AND HOUSING				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
XIV. Population and Housing Would the project:				

a) Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	Less than significant impact	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No impact	No	No	None

Section XIV of the Final EA/ISMND determined that the project would have a less than significant impact on population and housing. The project involves installation of fiber optic cable to serve underserved and unserved areas and key “anchor” institutions. The project is not anticipated to induce unplanned growth in any areas it would serve, and the Proposed Modification would not increase the likelihood of unplanned growth in the Trinidad area as it is part of the middle-mile phase of the project. The Proposed Modification would not create a new impact or increase the severity of an established impact.

### 3.15. Public Services

TABLE 16 PUBLIC SERVICES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XV. Public Services</i> <i>Would the project:</i>				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities.	No impact	No	No	None

Section XV of Appendix A of the Final EA/ISMND determined that the project would have no negative impact on public services because the project would improve delivery of internet and communication services for emergency services and schools, parks, and other public facilities. The modification would not create new impacts.

### 3.16. Recreation

TABLE 17 RECREATION				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XVI. Recreation</i> <i>Would the project:</i>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No impact	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant impact	No	No	RC-1, RC-2, RC-3 (not applicable to Proposed Modification)

Section XVI of Appendix A of the Final EA/ISMND determined that the project would have no impact on recreation as it would not create any additional recreational capacity or increase in the usage of recreational areas and facilities. The project would install conduit near the Chah-Gah-Cho trail, but the trail can be left open during construction as it has multiple entrances away from the Central Ave construction. At the entrance near construction, equipment would be safely barricaded away from the public. The project would also install conduit near Vista point, but the HDD method of construction would avoid any impacts to access. Any impacts to traffic are addressed and would be temporary.

### 3.17. Transportation

TABLE 18 TRANSPORTATION				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XVII. Transportation</i> <i>Would the project:</i>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Less than significant impact	No	No	None
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	No impact	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact	No	No	None
d) Result in inadequate emergency access?	No impact	No	No	None

Section XVII of Appendix A of the Final EA/ISMND analyzed traffic impacts associated with construction, including potential lane closures, and determined that the project would have a less than significant impact on transportation. The Proposed Modification could potentially result in temporary traffic delays, but the Proponent would create approved traffic control plans from Humboldt County, Caltrans, and the City of Trinidad to ensure that any impacts will be minimized. The project modification would not create a new impact or increase the severity of impacts analyzed in the Final EA/ISMND with implementation of the APMs identified in the Final EA/ISMND, including the requirement for a Traffic Management Plan.

### 3.18. Tribal Cultural Resources

TABLE 19 TRIBAL CULTURAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>XVIII. Cultural and Tribal Resources</i>				

TABLE 19 TRIBAL CULTURAL RESOURCES				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:	Less than significant impact	No	No	CR 1-8 (CR-8 is not applicable to Proposed Modification)
i) Listed or eligible for listing in the CRHR or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Less than significant impact	No	No	CR 1-8 (CR-8 is not applicable to Proposed Modification)
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	Less than significant impact	No	No	CR 1-8 (CR-8 is not applicable to Proposed Modification)

Section XVIII of Appendix A of the Final EA/ISMND determined that the project would have a less than significant impact on tribal cultural resources. On February 13, 2024, the Native American Heritage Commission (NAHC) was contacted to request a search of the Sacred Lands File (SLF) regarding the Alternate Route alignment of the Project. Cameron Vela, NAHC Cultural Resources Analyst, responded via an email on February 22, 2024, that the results of the NAHC SLF search

were negative, but that the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Mr. Vela also included a list of tribal representatives to contact. On April 4, 2024, updated AB 52 consultation letters were sent to all of the individuals listed on the NAHC contact list. No responses to these letters have been received to date but tribal consultations will be ongoing throughout permitting and construction. The newly recorded resource is not considered a tribal cultural resource as defined in PRC 21074. All cultural resources will be avoided as described in the CRIR, and the resource protection measures would address impacts of inadvertent discoveries. The project modification would comply with the APMs and mitigation measures for tribal cultural resources identified in the Final EA/ISMND and CRIR.

### 3.19. Utilities and Service Systems

TABLE 20 UTILITIES AND SERVICE SYSTEMS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
XXIX. <i>Utilities and Service Systems</i> <i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant impact	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	No impact	No	No	None
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No impact	No	No	None
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise	No impact	No	No	None

TABLE 20 UTILITIES AND SERVICE SYSTEMS				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
impair the attainment of solid waste reduction goals?				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No impact	No	No	None

Section XIX of Appendix A of the Final EA/ISMND determined the project would have a less than significant impact on utilities and service systems. The project would not require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, or natural gas.

The Proponent will submit engineering plans to Humboldt County, the City of Trinidad, and Caltrans to review for issuance of an encroachment permits for the Proposed Modification. Public utilities near the Proposed Alignment were identified and mapped on the engineering plans to ensure the Proposed Alignment will be installed with a minimum separation from private and public utilities. Any utilities that the alignment would cross will be potholed to ensure impacts are avoided. The project modification would not create a new impact or increase the severity of impacts analyzed in the Final EA/ISMND.

### 3.20. Wildfire

TABLE 21 WILDFIRE				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
<b>XX. Wildfire</b> <i>Would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No impact	No	No	None
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a	Less than significant impact	No	No	PH-1, PH-2

TABLE 21 WILDFIRE				
Environmental Issue	Conclusion in Appendix A of the Final EA IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances or Information Requiring New Analysis or Verification?	Applicant Proposed Measures
wildfire or the uncontrolled spread of a wildfire?				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No impact	No	No	None
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No impact	No	No	None

Section XX of the Final EA/ISMND determined that the project would have less than significant impact on wildfire risk. The Proposed Modification is located completely within an existing utility corridor on a residential street. Vehicle or equipment sparks pose a minor risk of wildfire, but the surrounding area has low risk of wildfire. The Proposed Modification would not create a new impact or increase the severity of impacts with implementation of the APMs identified in the final EA/ISMND, including implementation of the Fire Prevention Plan developed by Eocene in 2022.

## 4.0 CONCLUSION

The previous environmental document as herein amended may be used to fulfill the environmental review requirements of the current project. The project satisfies the conditions outlined in CEQA Guidelines §15164. The proposed project modification is deemed as non-substantial and would not result in any new significant impacts or any substantial increases in the severity of the previously identified environmental impacts. Consequently, the modifications do not otherwise trigger the need to prepare a subsequent negative declaration pursuant to CEQA Guidelines §15162. Therefore, there is no requirement to prepare a supplemental or subsequent negative declaration to address the environmental resources discussed above.



## 5.0 REFERENCES

Eocene Environmental Group, Inc. (Eocene). April 2024. Addendum to the Digital 299 Biological Evaluation.

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# **APPENDIX A**

## INITIAL STUDY