

County of Tuolumne Broadband Infrastructure Environmental Impact Report

FINAL
Environmental Impact Report

SCH No. 2023050017

Prepared by:

Tuolumne County Community Development Department
2 S. Green Street
Sonora, CA 95370

With technical support from:

HELIX Environmental Planning, Inc.
1180 Iron Point Road, Suite 130
Folsom, CA 95630

September 2024

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1.0 Executive Summary

This Final Environmental Impact Report (EIR) has been prepared to provide an assessment of the potential environmental consequences of approving and implementing the proposed County of Tuolumne Broadband Infrastructure Project (program or proposed program). This executive summary includes the conclusions of the environmental analysis contained in the Draft EIR and presents a summary of impacts and mitigation measures identified. The remainder of this Final EIR contains corrections and clarifications to the text and analysis of the Draft EIR, where warranted, along with a response to comments matrix and a list of commenters. For a complete description of the proposed program, see Chapter 3, Project Description, of the Draft EIR. For a complete discussion of alternatives to the proposed program, see Chapter 5, Alternatives, of the Draft EIR.

The Draft EIR addressed the environmental effects associated with approval and implementation of the proposed program. The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An EIR is a public document designed to provide the public, local, and State governmental agency decision-makers with an analysis of potential environmental consequences to support informed decision-making.

The Draft EIR was prepared pursuant to the requirements of CEQA and the CEQA Guidelines to determine if approval of the proposed program could have a significant effect on the environment. The County of Tuolumne, as the Lead Agency, reviewed and revised as necessary all submitted drafts, technical studies, and reports to reflect its own independent judgment, including reliance on applicable County technical personnel and review technical reports. Information for the Draft EIR was obtained from discussions with public service agencies; analysis of adopted plans and policies; review of available studies, reports, data, and similar literature in the public domain; and specialized environmental assessments (e.g., air quality, biological resources, cultural resources, greenhouse gas emissions, and noise).

1.1 ENVIRONMENTAL PROCEDURES

The Draft EIR, in conjunction with this Final EIR, has been prepared to assess the environmental effects associated with approval and development of the proposed program. The main purposes of the documents as established by CEQA are:

- To disclose to decision-makers and the public the significant environmental effects of proposed activities.
- To identify ways to avoid or reduce environmental damage.
- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- To disclose to the public reasons for agency decision of projects with significant environmental effects.
- To foster interagency coordination in the review of projects.

- To enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation identified in the statute and in the CEQA Guidelines. It provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. An EIR is intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts. An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information contained in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

1.2 REPORT ORGANIZATION

This Final EIR is organized into the following chapters:

- **Chapter 1: Executive Summary.** Summarizes environmental consequences that would result from implementation of the program, describes recommended mitigation measures, and indicates the level of significance of environmental impacts before and after mitigation.
- **Chapter 2: Introduction.** Provides an overview describing the use and organization of this Final EIR.
- **Chapter 3: Revisions to the Draft EIR.** Contains corrections to the text and graphics of the Draft EIR. Underline text represents language that has been added to the Draft EIR; text in ~~striketrough~~ has been deleted from the Draft EIR.
- **Chapter 4: List of Commenters.** Lists the names of agencies and individuals who commented on the Draft EIR.
- **Chapter 5: Comments and Responses.** Presents comments received from agencies and the public on the Draft EIR alongside responses to each comment. Also contains "master responses" that provide comprehensive responses to key issues raised by several comments.
- **Appendices:** The appendices for this Final EIR contain the following:
 - **Appendix A:** Comments Received on the Draft EIR
 - **Appendix B:** Project-Specific Addendum Checklist

The Draft EIR is available online and incorporated here by reference. It constitutes part of the Final EIR.

1.2.1 Type and Purpose of the EIR

According to Section 15121(a) of the CEQA Guidelines, the purpose of an EIR is to:

Inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

The Draft EIR has been prepared to meet the requirements of a program EIR as defined in CEQA Guidelines Section 15168(c) for streamlining later activities. In accordance with Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways. The proposed program meets these criteria for use of a program EIR. The conclusions made in the Draft EIR are listed in Table ES-1 of this Final EIR below.

1.3 SUMMARY OF THE PROPOSED PROJECT

The County is proposing to expand access to broadband technology throughout the County, including the unincorporated areas of the County. The Countywide program would install fiber optic conduit either underground in buried conduits, overhead on existing or newly constructed utility pole lines, or in a combination of both. Broadband infrastructure would be installed to provide above ground or underground lateral connections to private residences and businesses. Individual connections typically would be located in previously disturbed and/or developed areas (e.g., in rights-of-way [ROW] or public utility easements). The broadband infrastructure could follow other utility installations; therefore, it is likely that the ground along these alignments has been previously disturbed by prior utility work. Additionally, many of these connections would generally follow the route of the roadway, particularly if the applicable areas have other issues that could affect access, such as vegetation, geologic, landscape, and/or water features that should not be disturbed. This EIR conservatively assumes that new ground disturbance would be required for the entire program; however, there would be potential for utilizing existing conduit where only installation of fiber optic line would be required. If deemed feasible, the new broadband infrastructure constructed under an individual fiber project or phase would connect to existing infrastructure in the program area supported by existing service providers.

The area in which future broadband infrastructure could be implemented includes ROW within unincorporated areas of the County; it excludes federal lands, private roads, and State highway ROW. The County includes a total of approximately 610 miles of County-maintained roads. The installation of underground or overhead cables would be located within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County. The future location of broadband infrastructure would focus on areas of the County that are currently unserved or underserved. The exact alignment of future broadband infrastructure is unknown at this time and would be based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

1.4 SUMMARY OF PROJECT ALTERNATIVES

1.4.1 No Project Alternative

This alternative is required under Section 15126.6(e) of the CEQA Guidelines and represents a possible scenario that could occur if the proposed project is not approved. According to Section 15126.6 (e)(3)(B) of the CEQA Guidelines, if the project is other than a land use or regulatory plan, for example a

development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed. Under the No Project Alternative, no actions would be taken to expand broadband availability and the service area would remain unchanged from current conditions. The No Project Alternative would not meet the project objectives. However, as required by CEQA, the No Project Alternative is evaluated in this Draft EIR.

Although it is acknowledged that with the No Project Alternative, there would be no discretionary action by Tuolumne County, and thus no impact, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as “impacts” that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed Countywide program.

1.4.2 Aerial Installation Only Alternative

This alternative would only include individual fiber projects that install aboveground fiber optic line that would utilize existing or newly installed utility poles. No underground fiber optic line or new conduit would be installed under this alternative. This alternative was considered because it would avoid all impacts associated with underground installation, including construction impacts associated with horizontal directional drilling, plowing, trenching, microtrenching, line installation, and/or pavement repair. This alternative could also avoid the impacts associated with the spillage of drilling fluid.

Aboveground fiber optic lines are susceptible to damage from high winds, snowstorms, wildfires, and other natural disasters. Such damage would reduce the reliability of communications system, which could disrupt emergency communications during extreme storms, wildfires, or other emergency conditions when reliable communication is essential. The addition of utility poles may not be feasible in some locations in the County due to the rocky subsurface conditions that would make it nearly impossible to reach the boring depth required for secure pole installation. Furthermore, this alternative would result in additional aesthetics impacts associated with the additional utility poles. It should also be noted that existing poles are owned by certain utilities or exist as joint poles with shared use between utilities. Additional joint pole users may not be feasible, and the ability to add joint pole users may be difficult to augment. Consequently, this alternative would not meet several of the project objectives associated with providing a reliable system of broadband communications.

1.4.3 Underground Installation Only Alternative

This alternative would only include individual fiber projects that would install underground fiber optic lines and would utilize existing or newly installed underground conduit. No aboveground fiber optic line would be installed under this alternative. This alternative was considered because it could avoid possible impacts associated with aboveground installation, including aesthetic impacts and construction impacts associated with the installation of new utility poles and fiber optic line.

This alternative could be susceptible to biological, cultural, and geologic impacts due to underground installation, including construction impacts associated with horizontal directional drilling, plowing, trenching, microtrenching, and line installation. Additionally, this alternative could be susceptible to hazards and hazardous material impacts due to possible trenching or digging in proximity to existing, unmarked infrastructure. Depending on the prevailing geologic conditions, including bedrock near the surface, it may be impossible to install underground infrastructure in some parts of the County.

Consequently, this alternative would not meet several of the project objectives associated with providing a reliable system of broadband communications.

1.4.4 Use of Existing Infrastructure Alternative

This alternative would include individual fiber projects that install fiber optic line in existing fiber-specific conduit or along existing utility poles. This alternative was considered because it would avoid impacts associated with installation of new utility pole and new underground fiber-specific conduit infrastructure. This alternative would avoid or substantially reduce all potential impacts associated with the proposed Countywide program as outlined in this EIR. However, it would not meet most of the project objectives because it would not promote the expansion of broadband infrastructure into portions of the service area that do not already include sufficient conduit, utility poles, and/or supporting infrastructure.

1.5 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved. With regard to the proposed program, the major issues identified to be resolved in the Draft EIR include decisions by the County of Tuolumne, as Lead Agency, related to:

- whether the Draft EIR adequately described the environmental impacts of the proposed program;
- whether the benefits of the proposed program override those environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance;
- whether the identified mitigation measures should be adopted or modified; and,
- whether there are any alternatives to the proposed program that would substantially lessen any of the significant impacts of the proposed program and achieve most of the basic objectives.

1.6 AREAS OF CONCERN

The County of Tuolumne issued a Notice of Preparation of a Draft EIR on May 1, 2023, and held a scoping meeting on May 10, 2023, to receive scoping comments. During the 30-day scoping period for the EIR, responsible agencies and interested members of the public were invited to submit comments as to the scope and content of the EIR. While every environmental concern applicable to the CEQA process is addressed in the Draft EIR, the list is not necessarily exhaustive; rather, it attempts to capture those concerns that are likely to generate the greatest interest based on the input received during the scoping process. The comments received focused primarily on the following issues and the chapters in which these issues were addressed in the EIR are indicated in parentheses:

- Tribal consultation (Section 4.11, Tribal Cultural Resources)
- Tribal reservation land in the County (Section 4.11, Tribal Cultural Resources)
- Caltrans Encroachment Permit (Section 4.10 Transportation)

- Habitat assessments and survey-level protocols and focused surveys (Section 4.3 Biological Resources)
- Preparation of a Basin Plan (Section 4.8 Hydrology and Water Quality)
- Major wireless towers (Chapter 3.0 Project Description)

1.7 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Under CEQA, a significant impact on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.

As determined in the Draft EIR, the proposed project has the potential to generate significant environmental impacts in a number of areas. Pursuant to Section 15126.2(b) of the CEQA Guidelines, an EIR must describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As shown in Table ES-1, all significant impacts would be reduced to a less than significant level if the mitigation measures identified in the Draft EIR are adopted and implemented. As described in detail in Chapter 6, Environmental Impacts Found Not to be Significant, of the Draft EIR, the proposed program would have no significant impact on agricultural or forestry resources, energy, land use and planning, mineral resources, population and housing, public services, and recreation. Accordingly, these topics were not analyzed further in the Draft EIR.

Table ES-1 summarizes the conclusions of the environmental analysis contained in the Draft EIR and presents a summary of impacts and mitigation measures identified. It is organized to correspond with the environmental issues discussed in Sections 4.1 through 4.13 of the Draft EIR. Table ES-1 is arranged in four columns: 1) environmental impact; 2) significance without mitigation; 3) mitigation measures; and 4) significance with mitigation. For a complete description of potential impacts, please refer to the specific discussions in Sections 4.1 through 4.13 of the Draft EIR.

Table ES-1: Conclusions of the Environmental Analysis Contained in the Draft EIR

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
Aesthetics			
AES-1: The proposed project would have a substantial adverse effect on a scenic vista.	Less than significant	N/A	N/A
AES-2: The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	Less than significant	N/A	N/A
AES-3: The proposed project would degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage point) of the site and its surroundings in a non-urbanized area.	Less than significant	N/A	N/A
AES-4: The proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area.	Less than significant	N/A	N/A
AES-5: The proposed project would not result in a significant cumulative impact with respect to aesthetics.	Less than significant	N/A	N/A
Air Quality			
AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
AQ-2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard.	Less than significant	N/A	N/A
AQ-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Less than significant	N/A	N/A
AQ-4: The proposed project would not result in substantial emissions of odors adversely affecting a substantial number of people.	Less than significant	N/A	N/A
AQ-5: The proposed project would not contribute to a cumulatively considerable impact on regional air quality.	Less than significant	N/A	N/A
Biological Resources			
BIO-1: The proposed project may result in a substantial adverse effect, either directly or through habitat modifications, on 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 Wildlife or U.S. Fish and Wildlife Service.	Potentially significant	Mitigation Measure BIO-1: Prepare a Site-Specific Biological Resources Assessment Prior to project approval, the project applicant shall retain a qualified biologist to prepare a site-specific biological resources assessment (BRA). The BRA shall consist of a desktop review of relevant biological databases and online resources, a general biological reconnaissance survey, vegetation mapping, aquatic resources assessment, analysis of potential impacts to biological resources, and proposed measures to reduce and/or avoid potential impacts. If it is determined during the biological resources assessment that special-status species have the potential to occur within a project area, then project-specific mitigation measures should be recommended to reduce and/or avoid potential impacts. Potential measures for special-status species may include, but are not limited to,	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		protocol-level surveys, nesting bird surveys, and other focused pre-construction surveys. If it is determined that special-status species are present within or adjacent to the project area, or if the project has potential to impact USFWS designated critical habitat and/or NMFS essential fish habitat, then the project proponent shall coordinate with CDFW and/or USFWS, as necessary, to determine mitigation and/or avoidance measures to reduce potential impacts to a level that would be less than significant. Depending on site-specific conditions, agency involvement may be triggered through the regulatory permitting process or direct agency consultation.	
BIO-2: The proposed project may result in a substantial adverse effect on a sensitive natural community.	Potentially Significant	Mitigation Measure BIO-2: Jurisdictional Delineation and Regulatory Permitting If it is determined that impacts to jurisdictional waters or other sensitive natural communities cannot be avoided, then the project proponent shall apply for any necessary permits from the USACE, CDFW, and the RWQCB (e.g., Section 401/404 permits, CDFW Lake or Streambed Alteration Agreement, etc.). If necessary, a formal delineation of wetlands and “other waters” of the United States shall be prepared in accordance with the U.S. Army Corps of Engineers’ (USACE) Corps of Engineers Wetlands Delineation Manual and appropriate regional supplements to determine the extent of aquatic resources and quantify impacts. Impacts to jurisdictional waters and/or sensitive natural habitat shall be mitigated in accordance with agency requirements. Mitigation Measure BIO-3: Oak Resources Inventory If it is determined during the biological resources assessment that a project will result in impacts to oak resources, then the County may require mitigation for impacts to oak resources or regulated individual oak trees. Prior to project approval, the Community Development Department may require an inventory of prematurely removed trees or canopy cover to determine the extent of the loss. The inventory	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		shall be prepared by a resource professional with expertise in oak woodlands ecology who is on the list of qualified consultants maintained by the Community Development Department. Resource professionals may include botanists, ecologists, wildlife biologists, and foresters.	
BIO-3: The proposed project may result in a substantial adverse effect on State or federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) or other waters of the U.S. and State through direct removal, filling, hydrological interruption, or other means.	Potentially significant	See MM BIO-2	Less than significant
BIO-4: The proposed project would not interfere substantially with the movement of native resident wildlife species or with established native resident or migratory wildlife corridors.	Potentially significant	See MM BIO-1	Less than significant
BIO-5: The proposed project may conflict with local policies or ordinances protecting biological resources.	Potentially significant	See MM BIO-1 and MM BIO-3	Less than significant
BIO-6: The proposed project would not 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	N/A	N/A
BIO-7: The proposed project would not result in a significant cumulative impact with respect to biological resources.	Potentially significant	See MM BIO-1, MM BIO-2, and MM BIO-3	Less than significant
Cultural Resource			
CUL-1: The proposed project may cause a	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
substantial change in the significance of a historical resource pursuant to Section 15064.5.			
CUL-2: The proposed project may cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	Potentially significant	Mitigation Measure CUL-1: Archaeological Cultural Resources Investigations <i>Preconstruction Screening Identification</i> Prior to each phase of fiber optic installation, including appurtenant structures, unpaved staging areas, and fiber optic line, Tuolumne County shall request a records search from the Central California Information Center (CCIC) for project footprints for which ground disturbance is required in areas that have not been previously subject to such disturbance. For those areas of native, unpaved soil that have not been previously surveyed for archaeological cultural resources, the County shall require a pedestrian field survey by a qualified professional archaeologist. If archaeological cultural resources are identified as a result of that survey, the County shall implement the recommendations of the consulting archaeologist to avoid or substantially reduce the severity of impacts to such resources. For those areas that have been surveyed previously, the County shall abide by the recommendations of the professional archaeologist who conducted the original survey. <i>Known Resource Conflicts</i> In the event that the records search described above identify archaeological cultural resources that would be subject to project-related impact, the County shall evaluate the status of the resource under CEQA. The archaeological cultural resource shall be assessed for significance through the implementation of a Phase II investigation by a qualified archaeologist. This may require some or all of the following: • Development of a research design that guides assessments of site significance and scientific potential.	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		- Mapping and systematic collection of a representative sample of surface artifacts - Subsurface investigation through shovel test pits, surface scrapes, or 1 by 1 meter excavation units; a combination of such methods; or equivalent methods - Analysis of recovered material to determine significance pursuant to the CEQA Guidelines - Preparation of a report, including an evaluation of site significance, and recommendations for mitigation, if appropriate - Appropriate curation of collected artifacts. If the resource is precontact in nature, the Phase II investigation shall be coordinated with descendant tribal communities. If the Phase II evaluation concludes that the archaeological cultural resource does not qualify as a historical resource (PRC Section 21084.1) or unique archaeological resource (PRC Section 21083.2), then no further study or protection of the resource is necessary. If the resource does qualify as a historical or unique archaeological resource, then the County shall require the implementation of the Phase III approach described below. A Phase III data recovery effort, in accordance with CEQA Guidelines, shall be implemented by the consulting archaeologist for those sites that are shown by the Phase II efforts to qualify as significant under CEQA. The County shall ensure that data recovery conducted to the level that reduces impacts to below the level of significance has been completed prior to project implementation. The Phase III data recovery program shall include all or a combination of the following methods:	

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		• Development of a research design to identify important research questions that may be answered through a systematic study of the resource. • Mapping and systematic collection of surface artifacts, possibly complete data recovered depending on site size • Subsurface investigation through methods such as controlled hand-excavation units, machine excavations, deep testing, or a combination of methods. When applicable, other techniques, such as geophysical testing, may be warranted. • Analysis of recovered material through visual inspection and chemical analysis when applicable • Preparation of a report • Appropriate curation of collected artifacts If the resource is precontact in nature, the Phase III investigation shall be coordinated with descendant tribal communities.	
CUL-3: The proposed project may cause a substantial adverse change in the significance of archaeological cultural resources that are accidentally discovered during project construction	Potentially significant	Mitigation Measure CUL-2: Inadvertent Discovery of Archaeological Cultural Resources In the event that cultural resources are exposed during ground-disturbing activities, construction activities shall be halted within 100 feet of the discovery. Cultural resources could consist of but are not limited to stone, bone, wood, or shell artifacts, or features, including hearths, structural remains, or historic dumpsites. If the resources cannot be avoided during the remainder of construction, a consulting archaeologist, who meets the Secretary of the Interior's <i>Professional Qualifications Standards</i> for archaeology, shall assess the resource and provide appropriate management	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		recommendations. The County shall implement those recommendations to avoid or substantially reduce the severity of impact to significant resources.	
CUL-4: The proposed project may disturb human remains, including those interred outside of formal cemeteries	Potentially significant	Mitigation Measure CUL-3: Human Remains In the event of an accidental discovery or recognition of any human remains, PRC Section 5097.98 must be followed. Once project-related earthmoving begins and if there is a discovery or recognition of human remains, the following steps shall be taken: 1. There shall be no further excavation or disturbance of the specific location or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains are Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in PRC Section 5097.98, or 2. Where the following conditions occur, the landowner or their authorized representative shall reburial the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendent or on the project area in a location not subject to further subsurface disturbance:	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		- The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission; - The descendent identified fails to make a recommendation; or The landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the NAHC fails to provide measures acceptable to the landowner.	
CUL-5: The proposed project may result in cumulative impacts to cultural resources.	Potentially significant	See MM CUL-1, MM CUL-2 and MM CUL-3	Less than significant
Geology and Soils			
GEO-1: The proposed project may directly or indirectly cause potential substantial adverse effects involving rupture of known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, including liquefaction or landslides.	Less than significant	N/A	N/A
GEO-2: The proposed project would not result in substantial soil erosion or loss of topsoil.	Less than significant	N/A	N/A
GEO-3: The project may 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 the on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Less than significant	N/A	N/A
GEO-4: The proposed project may be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1194) and would not create	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
substantial direct or indirect risks to life or property.			
GEO-5: The proposed project would not require the use of septic tanks or an alternative wastewater disposal system.	No Impact	N/A	N/A
GEO-6: The proposed may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially significant	GEO-1: Perform a Site-Specific Paleontological Resources Inventory Assessment Before submitting a grading permit application, the applicant for an individual fiber project shall retain the services of a qualified professional paleontologist who shall prepare a paleontological resources inventory and assessment for any affected rock units. This report shall include the following components: • A report of any fossils observed during a reconnaissance-level field survey. • The results of a records search of appropriate paleontological databases (at a minimum, the database at the University of California, Berkeley Museum of Paleontology) to determine whether any previously recorded fossil localities are located within or immediately adjacent to the fiber optic facilities where rock boring or excavation that would reach paleontological soil is proposed. • A determination as to whether the geologic formations are of high or low paleontological sensitivity, and a discussion supporting the reasons why the sensitivity determinations were made. Prior to issuance of grading permits, the approving local jurisdiction shall review the reports and its findings to confirm no paleontological resources would be affected.	Less than significant
GEO-7: The proposed project would not result in a significant cumulative	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
impact with respect to geology and soils.			
Greenhouse Gas Emissions			
GHG-1: Implementation of the project would not generate GHG emissions that may have a significant impact on the environment.	Less than significant	N/A	N/A
GHG-2: Implementation of the project would not conflict with or obstruct implementation of applicable GHG reduction plans, policies, or regulations.	Less than significant	N/A	N/A
GHG-3: The proposed project would not contribute to a significant cumulative impact to regional and State GHG emissions.	Less than significant	N/A	N/A
Hazards and Hazardous Materials			
HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.	Less than significant	N/A	N/A
HAZ-2: The proposed project would not 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	N/A	N/A
HAZ-3: The proposed project would not emit hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
HAZ-4: The proposed project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Section 65962.5 of the California Government Code and, as a result, would not create a significant hazard to the public or the environment.	Less than significant	N/A	N/A
HAZ-5: The proposed project, which is not within an airport land use plan or within two miles of a public airport or public use airport, would not result in a safety hazard or excessive noise for people residing or working in the project area.	Less than significant	N/A	N/A
HAZ-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than significant	N/A	N/A
HAZ-7: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Less than significant	N/A	N/A
HAZ-8: The proposed project would not contribute to a significant cumulative impact with respect to hazards and hazardous substances.	Less than significant	N/A	N/A
Hydrology and Water Quality			
HYD-1: The proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
surface or groundwater quality.			
HYD-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	Less than significant	N/A	N/A
HYD-3: The project may 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: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (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 (iv) impede or redirect flood flows.	Less than significant	N/A	N/A
HYD-4: The project would not risk release of pollutants due to project inundation due to flood hazards, tsunamis, or seiches.	No impact	N/A	N/A
HYD-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
sustainable groundwater management plan.			
HYD-6: The proposed project would not contribute to a significant cumulative impact with respect to hydrology and water quality resources.	Less than significant	N/A	N/A
Noise			
NOI-1: The proposed project may result in a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County Noise Ordinance.	Potentially significant	Mitigation Measure NOI-1: Construction Hours and Best Management Practices Prior to issuing individual project construction approvals or permits, the County shall insure that construction documentation includes the following restrictions. Project construction activities within 1,900 feet of noise sensitive land uses (NSLUs; e.g., residences, schools, hospitals, convalescent homes, churches, libraries) shall implement the following best manage practices: - All noise-generating activities shall be prohibited between the hours of: 7:00 p.m. to 7:00 a.m. Monday through Saturday and at any time on Sundays and County recognized public holidays. - Equipment and trucks used for project construction shall utilize the best available noise control techniques (including mufflers, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds); and, - Impact equipment (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Whenever feasible, require the use of quieter procedures, such as drilling rather than impact equipment operation.	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
		Mitigation Measure NOI-2: Backup Generator Noise Control Prior to approving individual projects that require an emergency back generator, the County shall verify project plans include the following: Where feasible, emergency backup generators shall be installed no closer than 105 feet from any noise sensitive land use (NSLU; e.g., residences, schools, hospitals, convalescent homes, churches, libraries). If it is not feasible to locate emergency generators 105 feet or more from all NSLUs, the project proponent shall incorporate noise attenuating features (e.g., generator sound enclosures, noise barriers) into the equipment installation sufficient to reduce generator noise levels to 50 dBA LEQ or less measured at outdoor use areas or building edges of the closest NSLU. Noise levels at NSLUs shall be verified by a qualified acoustical professional.	
NOI-2: The proposed project would not result in the generation of excessive groundborne vibration levels.	Potentially Significant	Mitigation Measure NOI-3: Vibratory Roller Use Prior to issuing individual project construction approvals or permits, the County shall insure that construction documentation includes the following restrictions. Vibratory rollers shall be used in static mode only (no vibrations) within the flowing distances: • Within 15 feet of any occupied building; and • Within 18 feet of any older residential building; and, • Within 60 feet of a fragile historical building, ruin, or ancient monument.	Less than significant
NOI-3: The proposed project would not expose people residing or working in the project area to excessive noise levels from public use airports or private airstrips.	Less than significant	N/A	N/A
NOI-4: The proposed project would not contribute to a	Potentially significant	See MM NOI-01 and MM NOI-03	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
cumulatively considerable impact on ambient noise levels in the County.			
Transportation			
TRA-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system including transit, roadway, bicycle, and pedestrian facilities.	Less than significant	N/A	N/A
TRA-2: The proposed project would be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).	Less than significant	N/A	N/A
TRA-3: The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than significant	N/A	N/A
TRA-4: The proposed project would not result in inadequate emergency access.	Less than significant	N/A	N/A
TRA-5: The proposed project would not contribute to a significant cumulative impact with respect to transportation.	Less than significant	N/A	N/A
Tribal Cultural Resources			
TCR-1: The proposed project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geologically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California	Potentially significant	Mitigation Measure TCR-1: Tribal Consultation Tuolumne County shall conduct the appropriate tribal consultation outreach to relevant California Native American tribes, pursuant to PRC § 21080.3.1, for all future individual fiber projects included within the scope of the Tuolumne County Broadband EIR. Both local tribes, the Tuolumne Band of Me-Wuk and the Chicken Ranch Rancheria, are to be formally notified once site-specific information has been submitted to the County. Pursuant to PRC § 21080.3.1 (b), the tribes will have 30 days for AB 52 from the receipt of the request for	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).		consultation to either request or decline consultation for the individual fiber project, in writing, with the County for each proposed individual fiber project included in the scope of the Tuolumne County Broadband EIR. In the event that a general plan or specific plan adoption or amendment is required for the implementation of an individual fiber project, the County shall comply with the requirements of Senate Bill 18 (SB 18), in coordination with AB 52, as described in California Government Code § 65352.3.	
TCR-2: The proposed project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geologically 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: 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially significant	See MM TCR-1	Less than significant
TCR-3: The proposed project may cause a substantial adverse change in the significance of a tribal cultural resource	Potentially significant	Mitigation Measure TCR-2: Archaeological Treatment and Tribal Consultation In the event that TCRs are exposed during ground-disturbing activities, construction	Less than significant

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
inadvertently discovered during construction.		activities (e.g., grading, grubbing, or vegetation clearing) shall be halted in the immediate vicinity of the discovery. An archaeologist who meets the Secretary of the Interior's <i>Professional Qualifications Standards</i> shall then be retained to evaluate the resource's significance under CEQA in close coordination with tribal members who would provide traditionally based cultural knowledge for the analysis. If the discovery proves to be significant, additional work and mitigation measures, such as those listed in CUL-1, CUL-2, and CUL-3 as deemed appropriate by the tribal organization consulting on the find. Such mitigation may include avoidance, data recovery excavation, or traditional ethnographic research into the cultural importance of the find to contemporary descendant communities.	
TCR-4: The proposed project may result in a cumulative impact with respect to tribal cultural resources.	Potentially significant	See MM TCR-1 and MM TCR-2	Less than significant
Utilities and Service Systems			
UTIL-1: The proposed project may 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	N/A	N/A
UTIL-2: The proposed project would not have a significant impact on water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	Less than significant	N/A	N/A
UTIL-3: The proposed project would result in a determination by the	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
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.			
UTIL-4: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than significant	N/A	N/A
UTIL-5: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than significant	N/A	N/A
UTIL-6: The proposed project would result in a significant cumulative impact with respect to utilities.	Less than significant	N/A	N/A
Wildfire			
FIRE-1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	Less than significant	N/A	N/A
FIRE-2: Due to slope, prevailing winds, and other factors, the project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	Less than significant	N/A	N/A
FIRE-3: The proposed project would not require the installation or maintenance of associated	Less than significant	N/A	N/A

Significant Impact	Significance Without Mitigation	Mitigation Measures	Significance with Mitigation
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.			
FIRE-4: The proposed project would not 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.	Less than significant	N/A	N/A
FIRE-5: The proposed project would be located in a State Responsibility Area but would not contribute to a significant cumulative impact with respect to wildfire.	Less than significant	N/A	N/A

2.0 INTRODUCTION

Pursuant to CEQA Guidelines, Chapter 14 California Code of Regulations, Section 15378[a], the County of Tuolumne Broadband Infrastructure Project (proposed program or program) is considered a “project” subject to environmental review as its implementation is “an action [undertaken by a public agency] which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.” The assessment in this Final EIR is intended to inform the County’s decision-makers, other responsible agencies, and the public at-large of the nature of the proposed program and its effect on the environment.

2.1 PROPOSED PROJECT

The County is proposing to expand access to broadband technology throughout the County, including the unincorporated areas of the County. The Countywide program would result in the installation of fiber optic conduit (either underground in buried conduits, overhead on pole lines, or in a combination of both) by private Internet Service Providers (ISP). Broadband infrastructure would be installed to provide aboveground or underground lateral connections to private residences and businesses. Individual connections typically would be located in previously disturbed and/or developed areas (e.g., in rights-of-way [ROW] or public utility easements). The broadband infrastructure may be co-located with other utility installations; therefore, it is likely that the ground along these alignments has been previously disturbed by prior utility infrastructure. Additionally, many of these connections would generally follow the route of the County roadway, particularly if the applicable areas have other issues that could affect access, such as vegetation, geologic conditions, landscape, and/or water features that should not be disturbed. The Draft Environmental Impact Report (EIR) conservatively assumes that new ground disturbance would be required for the entire program; however, there would be potential for utilizing existing conduit where only installation of fiber optic line would be required. If deemed feasible, the new broadband infrastructure constructed under an individual project or phase would connect to existing infrastructure in the project area supported by existing ISPs.

The area in which future broadband infrastructure could be implemented includes all unincorporated areas of the County; it excludes federal lands, private roads, and State highway ROW. The County includes a total of approximately 610 miles of County-maintained roads. The installation of underground or overhead cables would be located within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County. The future location of broadband infrastructure would focus on areas of the County that are currently unserved or underserved. The exact alignment of future broadband infrastructure is unknown at this time and would be based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

2.2 EIR SCOPE

This Final EIR identifies and analyzes site specific potential impacts of the project which were determined in the Draft EIR. The analysis of the Draft EIR discloses the specific short-term impacts (construction) and long-term impacts (operation) that would occur as a result of project approval and implementation.

2.3 ENVIRONMENTAL REVIEW PROCESS

2.3.1 Draft EIR

Pursuant to CEQA Section 21080(d)1 and CEQA Guidelines Section 15063.2 the County determined that the proposed program could result in potentially significant environmental impacts and that an EIR would be required. In compliance with CEQA Section 21080.4, the County circulated the Notice of Preparation (NOP) of a Draft EIR for the proposed program to interested agencies and persons on May 1, 2023, for a 30-day review period. A public Scoping Meeting was held on May 10, 2023, at 6:30 p.m. at 2 South Green Street, Sonora, CA. The NOP and scoping process solicited comments from responsible and trustee agencies, as well as interested parties regarding the scope of the Draft EIR. Appendix B of this EIR includes the NOP comments received in response to the circulation of the NOP.

The scope of the Draft EIR was established by the County of Tuolumne through the EIR scoping process and includes an analysis of both the proposed project's impacts and cumulative impacts in the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Draft EIR was available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting on April 2, 2024, and ending on May 17, 2024. During the comment period, the public was invited to submit written comments on the Draft EIR via mail or e-mail to the Tuolumne County Community Development Department.

2.3.2 Final EIR

Upon completion of the 45-day review period for the Draft EIR, the County reviewed all comments received and prepared written responses for each comment. These letters are included in Appendix A of this Final EIR. This Final EIR includes written responses for each comment received during the public review period. This Final EIR consists of the Draft EIR, the comments received on the Draft EIR, and the responses to those comments, and describes any changes to the Draft EIR that have resulted from the comments received.

If the Tuolumne County Planning Commission determines that the project may be approved, it will certify this Final EIR and adopt and incorporate into the project all feasible mitigation measures identified in the EIR and may also require other feasible mitigation measures as conditions of approval. However, the Planning Commission may also find that the project does not satisfy the required findings for approval and decide to reject the project on that basis. In that case, the Planning Commission is not required to certify the Draft EIR.

The decisions regarding the Draft EIR and project approval would be appealable to the Tuolumne County Board of Supervisors, an elected body, which would then decide on both the EIR and project.

2.3.3 Mitigation Monitoring

Public Resources Code Section 21081.6 requires that the lead agency adopt a Mitigation Monitoring and Reporting Program (MMRP) for any project for which it has made mitigation findings pursuant to Public Resources Code 21081. The MMRP is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR. The MMRP for the proposed program is included in Appendix E to the Draft EIR.

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3.0 REVISIONS TO THE DRAFT EIR

This chapter presents changes to the Draft Environmental Impact Report (EIR) that resulted from preparation of responses to comments, or from staff-directed changes, including corrections and clarifications. In each case, the page and location on the page in the Draft EIR is presented, followed by the text or graphic revision. Underlined text represents language that has been added to the EIR; text with ~~striethrough~~ has been deleted from the EIR. The revisions in this chapter do not require recirculation of the Draft EIR because they do not constitute “significant new information” under Section 15088.5 of the CEQA Guidelines.

Chapter 3.0 Project Description

3.5.1 Construction Schedule and Methods

The broadband infrastructure program would begin construction of individual fiber projects in Spring 2025. Implementation of future individual fiber projects under the program would likely occur over many years. It is possible that multiple, individual fiber projects could have overlapping construction timeframes (or phases). Additionally, any individual segment could involve multiple construction crews working simultaneously, with plowing, trenching, and directional drilling occurring at the same time in different locations of the segment. Construction activities would occur between 7:00 a.m. and 7:00 p.m. ~~on weekdays~~ Monday through Saturday and would not occur at night.

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4.0 LIST OF COMMENTERS

Comments on the Draft Environmental Impact Report (EIR) were received from the following agencies and organizations. Letters are arranged by category, name, and date received. Each comment letter has been assigned a letter, as indicated below. These letters are included in and responded to in Table 5-1 of this Final EIR. Comments are presented in their original format in Appendix A, along with annotations that identify each individual comment number.

4.1 COMMENTS ON THE DRAFT EIR

4.1.1 Agency Comments

- Letter A – Central Valley Flood Protection Board (CVFPB; Received May 3, 2024)
- Letter B – California Department of Transportation (Caltrans; Received May 6, 2024)
- Letter C – California Department of Fish and Wildlife (CDFW; Received May 28, 2024)

4.1.2 Organization Comments

- Letter D – Central Sierra Environmental Resource Center (CSERC; Received May 17, 2024)

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5.0 RESPONSE TO COMMENTS

This chapter includes a reproduction of, and responses to, each comment letter received during the public review period on the Draft Environmental Impact Report (EIR). Comments are presented in their original format in Appendix A, along with annotations that identify each individual comment number.

Responses to individual comments are provided in this chapter alongside the text of each corresponding comment. Letters are categorized by:

- Governmental Agencies
- Non-Governmental Organizations and Private Companies

Letters are arranged by category and name. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and responses. Where a response requires revisions to the Draft EIR, these revisions are shown in Chapter 3.0 of this Final EIR. Table 5-1, *Response to Comments on the Draft EIR*, presents comments received on the Draft EIR and responses to each of those comments.

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Table 5-1: Response to Comments on the Draft EIR

Letter	Comment #	Commenter	Comment	Response
A	1	CVFPD	The Central Valley Flood Protection Board (Board) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed County of Tuolumne Broadband Infrastructure Environmental Impact Report Project (proposed project). The proposed project is located in Tuolumne County and involves installing fiber optic conduit either underground in buried conduits, overhead on existing or newly constructed utility pole lines, or in combination of both. Future locations of broadband infrastructure within Tuolumne County were not included in the DEIR. The portion of the Stanislaus River downstream of the Goodwin Dam, within Tuolumne County, is a regulated stream under Board jurisdiction, thereby requiring an encroachment permit.	The commenter has introduced their comments and has noted that the portion of the Stanislaus River requires an encroachment permit. Section 3.7, <i>Potential Permits and Approvals Required</i>, in the Draft EIR includes a table (Table 3-1) of potential permits and approvals that may be required for individual fiber projects depending on project character, location, and construction techniques of future broadband. However, the final required permits and approvals will be identified and obtained with each individual fiber project.
A	2	CVFPB	<u>Responsibility of the Central Valley Flood Protection Board</u> The Board is the State's regulatory agency responsible for enforcing appropriate standards for the construction, maintenance, and operation of the flood control system that protects life, property, and habitat in California's Central Valley. The Board serves as the State coordinator between local flood management agencies and the federal government, with the goal of providing the highest level of flood protection possible to California's Central Valley. The Board operates under authorities as described in the California Water Code (Water Code), which requires the Board to oversee future modifications or additions to	The commenter has provided a summary of CVFPB's responsibility. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.

Letter	Comment #	Commenter	Comment	Response
			facilities of the State Plan of Flood Control (SPFC). In addition, pursuant to assurances provided to the U.S. Army Corps of Engineers (USACE) by the Board on behalf of the State, the USACE Operation and Maintenance Manuals, Code of Federal Regulations, Title 33, Section 208.10, and United States Code, Title 33, Section 408, the Board is responsible for the operation and maintenance of the SPFC facilities. The USACE requires the Board to serve as the lead non-Federal sponsor for projects to improve or alter facilities of the SPFC pursuant to Code of Federal Regulations, Title 33, Section 408. The State's objectives include fulfilling the USACE's expectations pursuant to the assurances provided to the USACE.	
A	3	CVFPB	<u>Encroachment Permit</u> Per California Code of Regulations, Title 23, Waters, Division 1 (Title 23), Section 6, approval by the Board is required for all proposed work or uses, including the alteration of levees within any area for which there is an Adopted Plan of Flood Control within the Board's jurisdiction. In addition, Board approval is required for all proposed encroachments within a floodway, on adjacent levees, and within any Regulated Stream identified in Title 23, Table 8.1. Specifically, Board jurisdiction includes the levee section, the waterward area between project levees, a minimum 10-foot-wide strip adjacent to the landward levee toe, the area within 30 feet from the top of bank(s) of Regulated Streams, and inside Board's Designated Floodways. Activities outside of these limits, which could adversely affect Federal-State flood control facilities, as determined by Board staff, are also under the Board's jurisdiction. Permits may also be required for existing unpermitted encroachments or where it is necessary to establish the conditions normally imposed	The commenter has provided a summary of CVFPB jurisdiction and required approvals. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.

Letter	Comment #	Commenter	Comment	Response
			by permitting, including where responsibility for the encroachment has not been clearly established or ownership or uses have been changed.	
A	4	CVFPB	Federal permits, including USACE Section 404 and Section 10 regulatory permits and Section 408 Permission, in conjunction with a Board permit, may be required for the proposed project. In addition to federal permits, state and local agency permits, certification, or approvals may also be required. State approvals may include, but are not limited to, California Department of Fish and Wildlife's Lake and Streamed Alteration Agreement and Central Valley Regional Water Quality Control Board's Section 401 Water Quality Certification and/or Waste Discharge Requirement. The Applicant must obtain all authorizations that the proposed project may require.	The commenter has noted that federal, State, and local permits may be required for the proposed project. The commenter has also noted that the applicant must obtain all authorizations for the proposed project. Section 3.7, <i>Potential Permits and Approvals Required</i> , in the Draft EIR includes a table (Table 3-1) of potential permits and approvals that may be required for individual fiber projects depending on project character, location, and construction techniques of future broadband. However, the final required permits and approvals will be identified and obtained with each individual fiber project.
A	5	CVFPB	<u>Flood Impact Analysis</u> Pursuant to Section 15 of Title 23, the Board may deny an encroachment permit if the proposed project could: • Jeopardize directly or indirectly the physical integrity of levees or other works • Obstruct, divert, redirect, or raise the surface level of design floods or flows, or the lesser flows for which protection is provided • Cause significant adverse changes in water velocity or flow regimen • Impair the inspection of floodways or project works • Interfere with the maintenance of floodways or project works	The commenter has identified when the CVFPD may deny an encroachment permit. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.

Letter	Comment #	Commenter	Comment	Response
			- Interfere with the ability to engage in flood fighting, patrolling, or other flood emergency activities - Increase the damaging effects of flood flows - Be injurious to, or interfere with, the successful execution, functioning, or operation of any adopted plan of flood control - Adversely affect the State Plan of Flood Control, as defined in the California Water Code	
A	6	CVFPB	The Board, as a Responsible Agency under the California Environmental Quality Act (CEQA), will review and consider the environmental effects of the proposed project identified in the DEIR, and will reach its own conclusions on whether and how to approve the project involved (14 CCR15096, subd. (a)). This includes direct impacts to facilities under construction, as well as indirect impacts of the proposed project to surrounding facilities. Accordingly, the comments herein are intended to assist in the development of a robust CEQA document capable of supporting the Board's permitting process.	The commenter has noted that they will review the environmental effects of the proposed project and have provided comments to assist in the permitting process. This comment is noted but does not raise any environmental issue related to the specific contents of the Draft EIR.
A	7	CVFPB	The potential risks to public safety, including increased flood risks, need to be considered when developing proposed projects that seek to modify flood control works or the hydrology of the water ways. Board staff is available to discuss any questions you have regarding the above comments. Please contact Jordan Robbins at (916) 524-3454, or via email at Jordan.Robbins@CVFlood.ca.gov if you have any questions.	The commenter has noted that the potential flood risks need to be considered when development proposed projects. As noted in Section 4.8., <i>Hydrology and Water Quality</i> , of the Draft EIR, individual fiber projects would comply with County ordinances and construction standards to prevent flooding within 100-year flood zones.
B	1	Caltrans	The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Tuolumne County Broadband Infrastructure Environmental Impact Report. Tuolumne County is	The commenter has introduced their comments and has provided a summary of the Countywide program location and description. This comment does not raise

Letter	Comment #	Commenter	Comment	Response
			proposing to expand access to broadband technology throughout the County, including the unincorporated areas of the County. The Countywide program would install fiber optic conduit either underground in buried conduits, overhead on existing or newly constructed utility pole lines, or in combination of both. The future location of broadband infrastructure would focus on areas of the County that are currently unserved or underserved. The project sites are at various locations throughout Tuolumne County, including the unincorporated areas of the County and the one incorporated City of Sonora.	any environmental issue related to the specific contents of the Draft EIR.
B	2	Caltrans	Caltrans suggests that the County of Tuolumne continue to coordinate with Caltrans in identifying and addressing potential pedestrian safety and cumulative transportation impacts from this project and other developments near this location. This will assist Caltrans in ensuring that pedestrian, traffic safety, and quality standards are maintained for the traveling public on existing and future state transportation facilities in Tuolumne County.	The commenter has suggested that the County coordinate with Caltrans to identify potential pedestrian safety and cumulative transportation impacts. This comment is noted but does not raise any environmental issue related to the specific contents of the Draft EIR.
B	3	Caltrans	Tuolumne County may want to consider partnering with California Department of Technology (CDT) to install Broadband Middle Mile infrastructure to benefit the State, as there are segments with National Telecommunications and Information Administration (Federal) funding available to help alleviate the cost and reduce environmental impacts along State Route (SR) 120 and SR 108.	The commenter has suggested that the County partner with CDT to install broadband infrastructure. This comment is noted but does not raise any environmental issue related to the specific contents of the Draft EIR.
B	4	Caltrans	If there are any physical construction activities that encroach into Caltrans Right of Way (ROW), the project proponent must apply for an Encroachment Permit (EP) to the Caltrans District 10 Encroachment Permit Office.	The commenter has noted that the project proponent must apply for an EP and provide all CEQA documentation to the Caltrans District 10 Encroachment Permit

Letter	Comment #	Commenter	Comment	Response
			All California Environmental Quality Act (CEQA) documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies will include an analysis of potential impacts to any cultural sites, historic properties, biological resources, hazardous waste locations, scenic highways, and/or other environmental resources within Caltrans Right of Way, at the project site(s). Evidence of consultation with local Native American tribes and interested parties will need to be presented within the technical documents for approval of encroachment in the Caltrans ROW.	Office if there are any physical construction activities that encroach Caltrans ROW. Chapter 3.0, <i>Project Description</i>, of the Draft EIR notes that the area in which future broadband infrastructure could be implemented includes ROW within unincorporated areas of the County; it excludes federal lands, private roads, and State highway ROW. If individual fiber projects were to be located within Caltrans ROW, the project applicant would apply for an EP to the Caltrans District 10 Encroachment Permit Office.
B	5	Caltrans	There are mature trees within and/or near Caltrans ROW that could provide suitable nesting habitat. If work will occur between February 1 and September 30 of any year, a pre-construction bird survey must be conducted by a qualified biologist prior to the start of any construction related activities in Caltrans ROW. If an active nest is observed, a protective buffer must be established around the nest per CDFW guidelines. No work is allowed within the protective buffer limits until the young have fledged and until authorized by the Caltrans District 10 Environmental Office. Results of the preconstruction bird survey(s) must be provided to the Caltrans District 10 Environmental Office prior to the start of construction.	The commenter has noted that a pre-construction bird survey must be conducted if work will occur between February 1 and September 30 of any year. The commenter has also noted that results of the pre-construction survey must be provided to Caltrans prior to the start of construction. Chapter 3.0, <i>Project Description</i>, of the Draft EIR notes that the area in which future broadband infrastructure could be implemented includes ROW within unincorporated areas of the County; it excludes federal lands, private roads, and State highway ROW. Additionally, Chapter 4.3, <i>Biological Resources</i>, of the Draft EIR notes that individual fiber projects would be required to prepare a biological resources assessment (BRA) that would assess

Letter	Comment #	Commenter	Comment	Response
				impacts to special-status species on the individual project site, as outlined in Mitigation Measure BIO-1. Mitigation Measure BIO-1 notes that potential measures for special-status species may include, but are not limited to, protocol-level surveys, nesting bird surveys, and other focused preconstruction surveys. Mitigation Measure BIO-1 also notes that depending on site-specific conditions, agency involvement may be triggered through the regulatory permitting process or direct agency consultation.
B	6	Caltrans	If there are impacts to protected water resources within Caltrans ROW, Caltrans will need to see the correspondence with the permitting authorities (California Department of Fish and Wildlife, United States Army Corps of Engineers, Regional Water Quality Control Board) and/or be provided copies of any required permits prior to the start of any construction in Caltrans ROW.	The commenter has noted that if there are impacts to protected water resourced within Caltrans ROW, Caltrans will need to see the correspondence with the permitting authorities and/or provided copies of the permits. Chapter 3.0, <i>Project Description</i>, of the Draft EIR notes that the area in which future broadband infrastructure could be implemented includes ROW within unincorporated areas of the County; it excludes federal lands, private roads, and State highway ROW. If individual fiber projects were to be located within Caltrans ROW, the project applicant would apply for an EP to the Caltrans District 10 Encroachment Permit Office. Additionally, Chapter 4.3, <i>Biological Resources</i>, of the Draft EIR notes that with

Letter	Comment #	Commenter	Comment	Response
				implementation of Mitigation Measure BIO-2, potential impacts to jurisdictional waters, wetlands, and/or sensitive natural communities that may occur within the program area would be reduced to less than significant. Mitigation Measure BIO-2 notes that if it is determined that impacts to jurisdictional waters or other sensitive natural communities cannot be avoided, then the project proponent shall apply for any necessary permits from the USACE, CDFW, and the RWQCB (e.g., Section 401/404 permits, CDFW Lake or Streambed Alteration Agreement, etc.). If necessary, a formal delineation of wetlands and “other waters” of the U.S. shall be prepared in accordance with the USACE <i>Corps of Engineers Wetlands Delineation Manual</i> and appropriate regional supplements to determine the extent of aquatic resources and quantify impacts.
B	7	Caltrans	If any project activities encroach into Caltrans ROW, the project proponent must submit an application for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. Appropriate environmental studies must be submitted with this application. For more information, please visit the Caltrans Website at: https://dot.ca.gov/programs/traffic-operations/ep/applications	The commenter has noted that if project activities encroach into Caltrans ROW, an Encroachment Permit application must be submitted to Caltrans District 10. See response to comment B-4.
C	1	CDFW	The California Department of Fish and Wildlife (CDFW) received a DPEIR from Tuolumne County for the Project	The commenter has introduced their comments and has provided a summary of the Countywide program location and

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			pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. While the comment period may have ended, CDFW respectfully requests that Tuolumne County still consider our comments.	description. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.
C	2	CDFW	CDFW ROLE CDFW is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (<i>Id.</i>, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the	The commenter has provided a summary of CDFW’s role. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.

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			Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code. Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows: - Take is for necessary scientific research, - Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or - They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515) Additionally, specified types of infrastructure projects may be eligible for an Incidental Take Permit (ITP) for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project	

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			proponents should consult with CDFW early in the project planning process if an ITP may be pursued for the Project. Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Project. Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Native Plant Protection Act: The Native Plant Protection Act (NPPA) (Fish & G. Code §1900 <i>et seq.</i>) prohibits the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of state-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).	

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C	3	CDFW	PROJECT DESCRIPTION SUMMARY Proponent: County of Tuolumne Objective: The Project proposes to expand access to broadband technology throughout Tuolumne County, including the unincorporated areas within the County. The Countywide program would install fiber optic conduit either underground, overhead on existing or newly constructed utility pole lines, or a combination of both. The installation of underground or overhead cables would be located within existing maintained road right-of-way, public utility easements, and/or overhead public utility easements of record within Tuolumne County. Location: The Project site would be located within Tuolumne County limits. Tuolumne County has jurisdiction over a total of approximately 610 miles of county-maintained roads. Timeframe: N/A	The commenter has provided a summary of the Countywide program location and description. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.
C	4	CDFW	COMMENTS AND RECOMMENDATIONS CDFW submitted a Notice of Preparation (NOP) comment letter to Tuolumne County for the Project on May 30, 2023, with recommendations related to species habitat assessments and surveys, cumulative impacts analyses, federally-listed species consultation, and the potential need to notify for potential impacts to streams pursuant to Fish and Game Code section 1600 et seq. CDFW would like to note that it does not appear that the DPEIR adequately incorporated CDFW's recommendations from the NOP comment letter. As such, CDFW offers the following comments and recommendations to assist Tuolumne County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or	The commenter has noted that CDFW submitted a NOP comment on May 30, 2023, and has introduced their comments on the DEIR. This comment is noted but does not raise any environmental issue related to the specific contents of the Draft EIR.

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			other suggestions may also be included to improve the DPEIR prepared for the Project.	
C	5	CDFW	Special-Status Species Within the May 30, 2023 NOP comment letter, CDFW recommended that species specific habitat assessments, surveys, and mitigation measures be implemented for all future projects tiered from the PEIR to appropriately reduce and mitigate for potential impacts to special-status species. Additionally, CDFW noted that several special-status species could potentially be impacted by the proposed Project, including the State endangered great gray owl (<i>Strix nebulosa</i>), the State endangered and federally proposed endangered foothill yellow-legged frog (<i>Rana boylei</i>), the State threatened and federally endangered Sierra Nevada yellow-legged frog (<i>Rana sierrae</i>) and Sierra Nevada red fox (<i>Vulpes macrotis necator</i>), the State endangered and fully protected bald eagle (<i>Haliaeetus leucocephalus</i>), the State threatened tricolored blackbird (<i>Agelaius tricolor</i>), the State candidate-listed endangered Crotch's bumblebee (<i>Bombus crotchii</i>), State species of special concern and federally proposed threatened western pond turtle (<i>Actinemys marmorata</i>), and the State species of special concern California spotted owl (<i>Strix occidentalis occidentalis</i>). While the Impact Analysis section within the DPEIR mentions that individual fiber projects would be required to prepare a biological resource assessment (BRA) that would assess impacts to special-status species on the individual project site, no species-specific discussions, evaluations, or measures were included in the DPEIR to assist future projects with reducing and mitigating impacts for special-status species. As such, CDFW reiterates the special-status species habitat	The commenter has summarized their recommendations in the NOP comment letter received May 30, 2023. The NOP comment letter received by CDFW was considered and incorporated in the Draft EIR in concept and reference. As noted in Section 4.3, <i>Biological Resources</i>, of the Draft EIR, the NOP public comment letters were included in Appendix B to the Draft EIR. As noted in Section 4.3 of the Draft EIR, individual fiber projects would be located within previously disturbed and/or developed areas (e.g., in ROW or public utility easement), it is unlikely that the proposed Countywide program would result in a substantial adverse effect on special-status species or their associated habitats, including USFWS designated critical habitats and/or NMFS essential fish habitat. However, individual fiber projects would be required to prepare a BRA that would assess impacts to special-status species on the individual project site, as outlined in Mitigation Measure BIO-1. Mitigation Measure BIO-1 requires a qualified biologist to prepare a site-specific BRA that would consist of a desktop review, reconnaissance survey,

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			assessment, protocol-level survey, and avoidance, minimization, and mitigation recommendations from the May 30, 2023 NOP comment letter.	vegetation mapping, aquatic resources assessment, analysis of potential impacts to biological resources, and proposes measures to reduce and/or avoid potential impacts. It is also required that the project proponent coordinate with CDFW and/or USFWS if the project has potential to impact USFWS designated critical habitat and/or NMFS essential fish habitat. Additionally, if sensitive natural communities would be impacted by project implementation, then the impact would be potentially significant. With the implementation of Mitigation Measure BIO-2, potential impacts to jurisdictional waters, wetlands, and/or sensitive natural communities that may occur within the program area would be reduced to less than significant. Mitigation Measure BIO-2 requires that if jurisdictional waters or other sensitive natural communities cannot be avoided, then the project proponent would apply for any necessary permits from the USACE, CDFW, and the RWQCB. If necessary, a formal delineation of wetlands and "other waters" of the U.S. shall be prepared in accordance with the USACE <i>Corps of Engineers Wetlands Delineation Manual</i> and appropriate regional supplements.

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C	6	CDFW	Cumulative Impact Analysis Section 4.3.6 has a very broad analysis of cumulative impacts to biological resources and does not evaluate impacts to specific resources. CDFW recognizes this is in part because the exact alignment of future broadband infrastructure is unknown. The DPEIR states in section 5.12, "Most of the cumulative projects included in this analysis are residential and commercial development projects, including resorts and residential developments of varying densities." CDFW recommends that a more focused cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the project, even if those impacts are relatively small (i.e. less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA and we recommend that Tuolumne County reach out to CDFW for to discuss various methodologies and strategies for an analysis of this type for CDFW trustee agency resources.	The commenter has recommended cumulative impacts be analyzed using an accepted methodology. As outlined in Chapter 4.0, <i>Environmental Impact Analysis</i>, of the Draft EIR, CEQA Guidelines Section 15130 permits two different methodologies for completion of the cumulative impact analysis: the list approach and the projections approach. The Draft EIR employed a combination of the list, and plan/projections approaches to evaluate cumulative impacts. Table 4-1 in Chapter 4.0 of the Draft EIR includes 12 approved or pending residential and commercial projects in the County at the time that the NOP was issued. Chapter 4.0 also includes a summary of the basis for the cumulative impact analysis for each impact area. As the list and projections approach employed in the Draft EIR is an acceptable methodology to evaluate cumulative impacts per CEQA Guidelines Section 15130, no further analysis is required.
C	7	CDFW	Lake and Streambed Alteration Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to	The commenter has provided a summary of a LSAA and its requirements. Section 3.7, <i>Potential Permits and Approvals</i>

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			CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins. CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (https://wildlife.ca.gov/Conservation/LSA) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.	<i>Required</i>, in the Draft EIR includes a table (Table 3-1) of potential permits and approvals, including an LSAA, that may be required for individual fiber projects depending on project character, location, and construction techniques of future broadband. However, the final required permits and approvals will be identified and obtained with each individual fiber project.
C	8	CDFW	California Natural Diversity Database Please note that the CNDDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDDB does not mean that a species is not present. In order to adequately assess any potential Project related impacts to biological resources, surveys conducted by a qualified biologist	The commenter has noted that surveys conducted by a qualified biologist are warranted to determine project related impacts to biological resources. Section 4.3.5, <i>Impact Analysis of Biological Resources</i>, of the Draft EIR notes that "...individual fiber projects would be required to prepare a BRA that would assess impacts to special-status species on the individual project site, as outlined in

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			during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present.	Mitigation Measure BIO-1." As noted in Mitigation Measure BIO-1, "Prior to project approval, the project applicant shall retain a qualified biologist to prepare a site-specific BRA. The BRA shall consist of a desktop review of relevant biological databases and online resources, a general biological reconnaissance survey, vegetation mapping, aquatic resources assessment, analysis of potential impacts to biological resources, and proposed measures to reduce and/or avoid potential impacts." Desktop review as well as a reconnaissance survey, vegetation mapping, and an aquatic resources assessment will be conducted and prepared as part of individual fiber project approval.
C	9	CDFW	Federally Listed Species CDFW recommends consulting with the United States Fish and Wildlife Service (USFWS) on potential impacts to federally listed species including but not limited to, the yellow-legged frog, Sierra Nevada yellow-legged frog, and Sierra Nevada red fox. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground disturbing activities.	The commenter has recommended consultation with USFWS on potential impacts to federally listed species. Mitigation Measure BIO-1 in Section 4.3.5 of the Draft EIR notes that "If it is determined that special-status species are present within or adjacent to the project area, or if the project has potential to impact USFWS designated critical habitat and/or NMFS essential fish habitat, then the project proponent shall coordinate with CDFW and/or USFWS, as necessary, to determine mitigation and/or avoidance measures to reduce potential impacts to a level that would be less than significant.

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				Depending on site-specific conditions, agency involvement may be triggered through the regulatory permitting process or direct agency consultation."
C	10	CDFW	ENVIRONMENTAL DATA CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data. The types of information reported to CNDDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals.	The commenter has requested that any special-status species and natural communities detected be reported to the CNDDDB. For each individual fiber project, any special-status species and natural communities detected during project surveys will be reported to the CNDDDB.
C	11	CDFW	FILING FEES The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).	The commenter has noted that document filing fees are necessary and payable upon filing of the Notice of Determination. All required fees will be filed with the Notice of Determination.
C	12	CDFW	CONCLUSION	The commenter has provided more information on survey and monitoring

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			CDFW appreciates the opportunity to comment on the DPEIR to assist Tuolumne County in identifying and mitigating Project impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453, or john.riedel@wildlife.ca.gov.	protocols on CDFW's website. This comment is noted but does not raise any environmental issue related to the specific contents of the Draft EIR.
D	1	CSERC	Our Center understands that the County Broadband project proposes to install fiber optic conduit both (1) buried underground and (2) constructed overhead on existing or newly erected utility pole lines ("Project"). The Project focuses on the installation of broadband infrastructure in areas of the County that are currently unserved or underserved. Further, "[i]t is envisioned that the vast majority of future broadband infrastructure would be installed within existing County-maintained roads and ROW, public utility easements, and/or existing overhead public utility easements of record throughout the County. The exact alignment of future broadband infrastructure is currently [unknown] and would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources." ES-3 (emphasis added). "The broadband infrastructure may be co-located with other utility installations; therefore, it is likely that the ground along these alignments has been previously disturbed by prior utility infrastructure." ES-4. Our Center provides the	The commenter has introduced their comments and has provided a summary of the Countywide program location and description. This comment does not raise any environmental issue related to the specific contents of the Draft EIR.

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			following comments on the draft programmatic, Countywide Environmental Impact Report.	
D	2	CSERC	<u>Individual Project Checklist</u> The draft EIR acknowledges that it is merely a Countywide, large-scale, programmatic review document and contemplates that there will be a review process for individual fiber optic projects going forward to evaluate each project using a yet to be developed checklist. That checklist should be developed and incorporated into the draft EIR so that the public can review and provide comment. Such a checklist is integral to the draft EIR. For instance, any fiber optic project that is to occur in an area that is not within existing County-maintained roads and ROW, public utility easements, and/or existing overhead public utility easements of record throughout the County should undergo a more in-depth review process to ensure the individual project's impacts can be mitigated to a less than significant level.	This commenter has noted that the checklist should be developed and incorporated into the draft EIR so that the public can review and provide comments. The Project-Specific Addendum Checklist is included as Appendix B to this Final EIR.
D	3	CSERC	<u>Aesthetics</u> If new overhead lines need to be erected as part of the Project, an analysis of the impacts to Aesthetics should be considered and appropriate mitigation measures be implemented to reduce the impact to a less than significant level.	This commenter has noted that if overhead lines need to be construction, an analysis of the impacts to Aesthetics should be considered. Section 4.1.3, <i>Impact Analysis for Aesthetics</i>, of the Draft EIR notes that "the proposed underground fiber optic lines would not be visible and would therefore not substantially degrade the existing visual character or quality of public views of the site. However, the program proposes aboveground fiber optic lines that would utilize existing or newly construction utility poles. Portions of the program area are lined with tall vertical features, including mature trees,

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				utility poles, streetlights, and roadway signs as well as horizontal features, including buildings, pavement edges, fences, and utility lines. Although aboveground fiber optic lines and newly constructed utility poles would be introduced into existing viewsheds, these structures would be generally consistent with existing vertical and horizontal features within the program area. New aboveground fiber optic lines and utility poles would not be large enough to dominate existing viewsheds or detract from existing views in the program area. Some portions of the program area have higher viewer sensitivity, such as those areas with more residences or recreational resources (e.g., trails); however, the visual changes from the program would be compatible with the existing environment and the overall change in visual quality would be less than significant as aboveground fiber conduit features would not result in any notable changes to existing visual elements, or to the vividness, intactness, or unity of existing views. Therefore, construction and operation of the Countywide program would not substantially degrade existing visual character or quality of public views in non-urbanized areas. The impact would be less than significant." The installation of new overhead lines was analyzed in the

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				Draft EIR and determined to be less than significant.
D	4	CSERC	Biological Resources The draft EIR states that the “[b]iological studies conducted in support of this EIR consisted of a special-status species evaluation, which included a desktop review and database searches to identify known biological resources in Tuolumne County and vicinity. . .” 4.3-14. While there is some value in desktop reviews and database searches, on the ground surveys are needed to properly analyze whether any special-status species are present that may be impacted by the individual projects.	This commenter has noted that while there is value in desktop reviews and database searches, on the ground surveys are needed for individual projects. Please see Response to C-54 through C-10.
D	5	CSERC	As an example of the potential error in a desktop review and/or database searches, Table 4.3-1 in the draft EIR states that there is a total of 15 acres of Deciduous Orchard in Tuolumne County. Indigeny Reserve alone has more than 100 acres of deciduous orchard. Too much reliance on desktop reviews and database searches may provide wildly inaccurate information leading to unintended significant negative impacts.	The commenter has noted that too much reliance on desktop reviews may provide inaccurate information. Please see Response to C-54 through C-10.
D	6	CSERC	As the draft EIR acknowledges, “[w]ith the programmatic nature of this EIR, a precise, project-level analysis of the specific effects of individual fiber projects on special-status species is not possible at this time; the analysis is maintained at the County level. . . individual fiber projects would be required to prepare a biological resources assessment (BRA) that would assess impacts to special-status species on the individual project site. . .” 4.3-18-19. The contemplated checklist should include the requirement for the completion of a BRA for the individual fiber projects.	This commenter has noted that a BRA should be completed for individual fiber projects. Please see Response to C-5 and D-24.
D	7	CSERC	In order to reduce the impact to a less than significant level for BIO-1 through BIO-7, Mitigation Measure BIO-1	The commenter has noted that Mitigation Measure BIO-1 should include the time of

Commented [QY1]: Is this the right reference?

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			should include the requirement that the biological reconnaissance survey(s) be conducted during the time of year when the potential special-status species are likely to be present and/or when they are most easily identifiable. Also, surveys for special-status bats as well as for nesting birds should also be conducted to ensure individual impacts can be mitigated to a less than significant level.	year when the potential special-status species are likely to be present. The commenter has also noted that surveys for special-status bats as well as for nesting birds should be conducted. Mitigation Measure BIO-1 in Section 4.3.5 of the Draft EIR notes that “Prior to project approval, the project applicant shall retain a qualified biologist to prepare a site-specific BRA. The BRA shall consist of a desktop review of relevant biological databases and online resources, a general biological reconnaissance survey, vegetation mapping, aquatic resources assessment, analysis of potential impacts to biological resources, and proposed measures to reduce and/or avoid potential impacts. If it is determined during the biological resources assessment that special-status species have the potential to occur within a project area, then project-specific mitigation measures should be recommended to reduce and/or avoid potential impacts. Potential measures for special-status species may include, but are not limited to, protocol-level surveys, nesting bird surveys, and other focused pre-construction surveys.”
D	8	CSERC	<u>Potential Impacts to Agricultural Land</u> The draft EIR incorrectly analyzed the potential impacts to agricultural lands. In concluding that the Project	The commenter has noted that the draft EIR incorrectly analyzed the potential impacts to agricultural lands. As noted in

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			impacts to agricultural land would be less than significant, the draft EIR incorrectly concludes that “because the Countywide program would be located within existing County maintained road ROW, public utility easements, and/or overhead public utility easements of record throughout the County, construction, staging, and equipment lay-down areas of broadband infrastructure would not be sited on lands that are currently in agricultural production. . .” 6-1. This is an overstatement. As the draft EIR mentions numerous times, the exact location of the individual fiber projects is not known and may include areas that do not meet the above description. While an individual fiber project on agricultural land may not pose a significant impact on agricultural land, the draft EIR’s basis and reasoning in reaching its conclusion regarding the impacts to agricultural land is flawed.	Response to D- 12 , the Project-Specific Addendum Checklist is included as Appendix B to this Final EIR. Agriculture and Forestry Resources is one of the environmental resource sections within the Project-Specific Addendum Checklist and will be further evaluated for each individual fiber project.
D	9	CSERC	<u>Inconsistency</u> The draft EIR states on page 3-3 that work would occur on weekdays, but the Noise mitigation measures state that work will occur Monday through Saturday. Clarity should be provided as to when work will be permitted.	The commenter has noted that clarity should be provided as to when work will be provided. The language regarding when work will occur was revised in Section 3.5.1, Construction Schedule, and Methods. Please see the revisions in Chapter 3.0, <i>Revisions to Draft EIR</i> , of this Final EIR.
D	10	CSERC	<u>Conclusion</u> Caution should be exercised when relying on desktop reviews and database searches as they do not always provide accurate information. Since the draft EIR is simply a programmatic, Countywide review that only utilized desktop reviews and database searches, individual fiber projects should carefully review the potential impacts of the individual project. The checklist contemplated for use	The commenter has noted that individual fiber projects should review the potential impacts of the individual project and noted that the checklist should be provided to the public for review and comment. Please see Response to D- 21 .

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			in evaluating each individual fiber optic project should be provided to the public for review and comment.	

[Project Name]

Project-Specific Addendum Checklist to the
County of Tuolumne Broadband Infrastructure
Program Environmental Impact Report

Prepared for:

Tuolumne County Community Development Department
2 S. Green Street
Sonora, CA 95370

Prepared by:

[Name]
[address]
[address]

[date]

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Commented [JP1]: Require preparation of an MMRP?

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1	Regional Location.....	X
2	Project Location	X
3	Site Plan	X

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LIST OF TABLES

No.	Title	Page
1	Table Title.....	X
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ACRONYMS AND ABBREVIATIONS

Include all acronyms and abbreviations.

1.0 Introduction

1.1 DOCUMENT OVERVIEW AND PURPOSE

The Tuolumne County Board of Supervisors (BOS) certified the Program Environmental Impact Report (PEIR) for the County of Tuolumne Broadband Infrastructure Project (State Clearinghouse No. 2023050017) in July 2024. The PEIR evaluated the installation of fiber optic conduit either underground in buried conduits, overhead on existing or newly constructed utility pole lines, or in a combination of both throughout the County of Tuolumne. The PEIR was prepared to meet the requirements as defined in the California Environmental Quality Act (CEQA) Guidelines Section 15168(c) for streamlining later activities. In accordance with Section 15168 of the CEQA Guidelines, a PEIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

This project specific addendum (PSA) checklist process was designed during the PEIR preparation for use by internet service providers (ISP) to streamline the environmental review process for individual broadband projects within the County. This PSA checklist is a modified Appendix G Environmental Checklist Form, pursuant to State California Environmental Quality Act (CEQA) Guidelines Section 15162 and is used to determine whether an individual fiber project site and activities qualify as a later activity within the scope of the analysis in the PEIR (State CEQA Guidelines Section 15168[c]).

If a subsequent project would have effects that were not examined in the County of Tuolumne Broadband Infrastructure PEIR, an initial study may be prepared to determine the appropriate level of environmental review. If another environmental document is needed, whether it is a notice of exemption (NOE), negative declaration (ND), mitigated negative declaration (MND), or EIR, the PEIR can be used to simplify the task of preparing the subsequent environmental document, as indicated in CEQA Guidelines Section 15168(d).

2.0 Project Specific Addendum Checklist

2.1 INFORMATION SHEET

1. Project title: Project Title
2. Lead agency name and address: Lead Agency, Address
3. Contact person and phone number: Contact
Phone
4. Project location: Location
5. Project sponsor's name and address: If other than #2
6. General plan designation: General plan designation
7. Zoning: Zoning

8. Description of project:

Project description.

9. Surrounding land uses and setting:

Description of surrounding land uses.

10. Required Actions

Agency approvals and/or permits.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Description of consultation process.

3.0 Determination

On the basis of this project specific addendum checklist and the substantial evidence supporting it:

- ☐ I find that all of the effects of the proposed project (a) have been covered in the County of Tuolumne Broadband Infrastructure PEIR, and (b) all applicable mitigation measures identified in the County of Tuolumne Broadband Infrastructure PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the County of Tuolumne Broadband Infrastructure PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- ☐ I find that the proposed project will have effects that were not covered in the County of Tuolumne Broadband Infrastructure PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the County of Tuolumne Broadband Infrastructure PEIR. A **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project will have effects that were not covered in the County of Tuolumne Broadband Infrastructure PEIR or will have effects that are substantially more severe than those covered in the County of Tuolumne Broadband Infrastructure PEIR. Although these effects may be significant in the absence of additional mitigation beyond the County of Tuolumne Broadband Infrastructure PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the County of Tuolumne Broadband Infrastructure PEIR and/or (b) substantially more severe than those covered in the County of Tuolumne Broadband Infrastructure PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Signature

Date

Printed Name

Title

Agency

4.0 Evaluation of Environmental Impacts

1. Refer to the applicable resource analysis section in the County of Tuolumne Broadband Infrastructure PEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact question, including impacts that have been identified in the PEIR as well as any “new impacts”, if applicable.
3. The discussion of each impact question identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:
 - Briefly describe the impact of the proposed project.
 - Summarize the impact as it was presented in the PEIR, including a statement that the impact is covered in the PEIR.
 - Provide evidence that (explain why) the project impact is covered in PEIR, considering whether the proposed project is consistent with the activities addressed in the PEIR.
 - Identify Mitigation Measures (MM) from the PEIR that are applicable to the project.
 - (If applicable) Explain why the impact significance in the PSA checklist is different than that found in the PEIR; substantiate the different (new) significance conclusion.
 - (If applicable) Explain why MM identified for this impact in PEIR do not apply to this project. This circumstance may exist where a potentially significant impact was identified in the PEIR, but the impact severity would be less for the project, or the MM does not otherwise apply.
4. If the project proponent has determined that a new impact would occur, then the PSA checklist must indicate whether the new impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. “Potentially Significant” is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more “Potentially Significant” new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. A ND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the County of Tuolumne Broadband Infrastructure PEIR and focus the environmental analysis solely on issues that were not addressed in the County of Tuolumne Broadband Infrastructure PEIR.
6. Project proponents should incorporate references to information sources for potential impacts.

I. AESTHETICS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact AES-1: Have a substantial adverse effect on a scenic vista?	LTS	Impact AES-1, pp. 4.1-8 – 4.1-9				
Impact AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	LTS	Impact AES-2, pp. 4.1-9 – 4.1-10				
Impact AES-3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?	LTS	Impact AES-3, pp. 4.1-10 – 4.1-11				
Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	Impact AES-4, pp. 4.1-11 – 4.1-12				

¹LTS= Less than significant

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Aesthetic Impacts: Would the project result in other impacts to aesthetics that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes ☐ No		If yes, complete row(s) below and discussion	
		Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐	☐

Discussion

Impact AES-1

Impact AES-2

Impact AES-3

Impact AES-4

New Aesthetic Impacts

II. AGRICULTURE AND FORESTRY RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact AG-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	N/A	N/A				
Impact AG-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract?	N/A	N/A				
Impact AG-3: 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))?	N/A	N/A				
Impact AG-4: Result in the loss of forest land or conversion of forest land to non-forest use?	N/A	N/A				
Impact AG-5: 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?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Agriculture and Forestry Resources Impacts: Would the project result in other impacts to agriculture and forestry that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes ☐ No		If yes, complete row(s) below and discussion	
			Potentially Significant	Less Than Significant with Mitigation Incorporated
[Identify new impact here, if applicable; add rows as needed]			☐	☐

Discussion

Impact AG-1

Impact AG-2

Impact AG-3

Impact AG-4

Impact AG-5

New Agriculture and Forestry Resource Impacts

III. AIR QUALITY

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan?	LTS	Impact AQ-1, pp. 4.2-12 – 4.2-13				
Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	LTS	Impact AQ-2, pp. 4.2-13 – 4.2-14				
Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations?	LTS	Impact AQ-3, pp. 4.2-14				
Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	Impact AQ-4, pp. 4.2-15				

¹LTS= Less than significant

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Air Quality Impacts: Would the project result in other impacts to air quality that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion	
			Potentially Significant	Less Than Significant with Mitigation Incorporated
[Identify new impact here, if applicable; add rows as needed]		☐	☐	☐

Discussion

Impact AQ-1

Impact AQ-2

Impact AQ-3

Impact AQ-4

New Air Quality Impacts

IV. BIOLOGICAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact BIO-1: 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 CDFW or USFWS?	PSU	Impact BIO-1, pp. 4.3-18 – 4.3-19				
Impact BIO-2: Have a substantial adverse effect of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?	PSU	Impact BIO-2, pp. 4.3-19 – 4.3-20				
Impact BIO-3: 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?	PSU	Impact BIO-3, pp. 4.3-20				
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?	PSU	Impact BIO-2, pp. 4.3-20 – 4.3-21				
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	PSU	Impact BIO-2, pp. 4.3-21				
Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	NI	Impact BIO-2, pp. 4.3-21				

¹PSU= Potentially significant impact; NI= No impact

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

Project Name _____

New Biological Resources Impacts: Would the project result in other impacts to biological resources that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐	

Discussion

Impact BIO-1

Impact BIO-2

Impact BIO-3

Impact BIO-4

Impact BIO-5

Impact BIO-6

New Biological Resource Impacts

V. CULTURAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR ¹	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	LTS	Impact CUL-1, pp. 4.4-11 – 4.4-12				
Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	PSU	Impact CUL-2, pp. 4.4-12 – 4.4-14				
Impact CUL-3: Cause a substantial adverse change in the significance of archaeological cultural resources that are accidentally discovered during project construction?	PSU	Impact CUL-3, pp. 4.4-14				
Impact CUL-4: Disturb any human remains, including those interred outside of formal cemeteries?	PSU	Impact CUL-4, pp. 4.4-14 – 4.4-15				

¹PSU= Potentially significant impact; LTS= Less than significant

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Cultural Resource Impacts: Would the project result in other impacts to cultural resources that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes		☐ No		If yes, complete row(s) below and discussion
	Potentially Significant		Less Than Significant with Mitigation Incorporated		Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐		☐		☐

Discussion

Impact CUL-1

Impact CUL-2

Impact CUL-3

Impact CUL-4

New Cultural Resource Impacts

VI. ENERGY

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact EN-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	N/A	N/A				
Impact EN-2: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Energy Impacts: Would the project result in other impacts to energy that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes ☐ No		If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact EN-1

Impact EN-2

New Energy Impacts

VII. GEOLOGY AND SOILS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?	LTS	Impact GEO-1, pp. 4.5-10				
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil?	LTS	Impact GEO-2, pp. 4.5-10 – 4.5-11				
Impact GEO-3: 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 the on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	LTS	Impact GEO-3, pp. 4.5-11				
Impact GEO-4: 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?	LTS	Impact GEO-4, pp. 4.5-12				
Impact GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	NI	Impact GEO-5, pp. 4.5-12				
Impact GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	PSU	Impact GEO-6, pp. 4.5-12 – 4.5-13				

¹PSU= Potentially significant impact; LTS= Less than significant impact; NI= No impact

Project Name

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Geology and Soils Impacts: Would the project result in other impacts to geology and soils that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact GEO-1

Impact GEO-2

Impact GEO-3

Impact GEO-4

Impact GEO-5

Impact GEO-6

New Geology and Soils Impacts

VIII. GREENHOUSE GAS EMISSIONS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ¹	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	LTS	Impact GHG-1, pp. 4.6-11 – 4.6-12				
Impact GHG-2: Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?	LTS	Impact GHG-2, pp. 4.6-12				

¹LTS= Less than significant impact

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New GHG Emissions Impacts: Would the project result in other impacts to GHG emissions that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact GHG-1

Impact GHG-2

New Impacts Related to GHG Emissions

IX. HAZARDS AND HAZARDOUS MATERIALS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact HAZ-1: Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	LTS	Impact HAZ-1, pp. 4.7-15				
Impact HAZ-2: 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?	LTS	Impact HAZ-2, pp. 4.7-16 – 4.7-17				
Impact HAZ-3: Emit hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	Impact HAZ-3, pp. 4.7-17				
Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Section 65962.5 of the California Government Code and, as a result, would create a significant hazard to the public or the environment?	LTS	Impact HAZ-4, pp. 4.7-16 – 4.7-17				
Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	LTS	Impact HAZ-5, pp. 4.7-18				
Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTS	Impact HAZ-6, pp. 4.7-18 – 4.7-19				
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	LTS	Impact HAZ-7, pp. 4.7-19 – 4.7-20				

¹LTS= Less than significant impact

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

Project Name

New Hazards and Hazardous Materials Impacts: Would the project result in other impacts related to hazards and hazardous materials that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐	

Discussion

Impact HAZ-1

Impact HAZ-2

Impact HAZ-3

Impact HAZ-4

Impact HAZ-5

Impact HAZ-6

Impact HAZ-7

New Hazards and Hazardous Materials Impacts

X. HYDROLOGY AND WATER QUALITY

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact HYD-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	LTS	Impact HYD-1, pp. 4.8-11				
Impact HYD-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	Impact HYD-2, pp. 4.8-11 – 4.8-12				
Impact HYD-3: 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: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (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 (iv) impede or redirect flood flows?	LTS	Impact HYD-3, pp. 4.8-12 – 4.8-13				
Impact HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LTS	Impact HYD-4, pp. 4.8-13 – 4.8-14				
Impact HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	Impact HYD-5, pp. 4.8-14				

¹LTS= Less than significant impact

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Hydrology and Water Quality Impacts: Would the project result in other impacts to hydrology and water quality that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion
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	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact HYD-1

Impact HYD-2

Impact HYD-3

Impact HYD-4

Impact HYD-5

New Hydrology and Water Quality Impacts

XI. LAND USE AND PLANNING

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact LU-1: Physically divide an established community?	N/A	N/A				
Impact LU-2: Cause 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?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Land Use and Planning Impacts: Would the project result in other impacts to land use and planning that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?		☐ Yes	☐ No	If yes, complete row(s) below and discussion		
		Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[Identify new impact here, if applicable; add rows as needed]		☐	☐	☐		

Discussion

Impact LU-1

Impact LU-2

New Land Use and Planning Impacts

XII. MINERAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact MR-1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	N/A	N/A				
Impact MR-2: 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?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Mineral Resources Impacts: Would the project result in other impacts to mineral resources that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes ☐ No		If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact MR-1

Impact MR -2

New Mineral Resources Impacts

XIII. NOISE

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact NOI-1: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	PSU	Impact NOI-1, pp. 4.9-7 – 4.9-10				
Impact NOI-2: Result in generation of excessive groundborne vibration or groundborne noise levels?	PSU	Impact NOI-2, pp. 4.9-10 – 4.9-11				
Impact NOI-3: 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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LTS	Impact NOI-3, pp. 4.9-11				

¹PSU= Potentially significant impact; LTS= Less than significant impact²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Noise Impacts: Would the project result in other noise-related impacts that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion**Impact NOI-1****Impact NOI-2****Impact NOI-3**

New Noise Impacts

XIV. POPULATION AND HOUSING

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact POP-1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	N/A	N/A				
Impact POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Population and Housing Impacts: Would the project result in other impacts to population and housing that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion		
			Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐	☐	☐

Discussion

Impact POP-1

Impact POP-2

New Population and Housing Impacts

XV. PUBLIC SERVICES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:						
Impact PS-1: Fire Protection?	N/A	N/A				
Impact PS-2: Police Protection?	N/A	N/A				
Impact PS-3: Schools?	N/A	N/A				
Impact PS-4: Parks?	N/A	N/A				
Impact PS-5: Other public facilities?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Public Service Impacts: Would the project result in other impacts to public services that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?		☐ Yes	☐ No	If yes, complete row(s) below and discussion		
				Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]				☐	☐	☐

Discussion**Impact PS-1****Impact PS-2****Impact PS-3****Impact PS-4**

Impact PS-5

New Public Services Impacts

XVI. RECREATION

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact REC-1: 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?	N/A	N/A				
Impact REC-2: 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?	N/A	N/A				

¹N/A= Determined to have no impact and therefore not analyzed in the PEIR.

²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Recreation Impacts: Would the project result in other impacts to recreation that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐	

Discussion**Impact REC-1****Impact REC-2****New Recreation Impacts**

XVII. TRANSPORTATION

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
TRA-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	LTS	Impact TRA-1, pp. 4.10-13				
TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	LTS	Impact TRA-2, pp. 4.10-13 – 4.10-14				
TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS	Impact TRA-3, pp. 4.10-14				
TRA-4: Result in inadequate emergency access?	LTS	Impact TRA-4, pp. 4.10-15				

¹LTS= Less than significant impact²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Transportation Impacts: Would the project result in other impacts to transportation that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes		☐ No		If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐		

Discussion**Impact TRA-1****Impact TRA-2****Impact TRA-3****Impact TRA-4**

New Transportation Impacts

XVIII. TRIBAL CULTURAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	PSU	Impact TCR-1, pp. 4.11-8 – 4.11-9				
TCR-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe	PSU	Impact TCR-2, pp. 4.11-9				
Impact TCR-3: Cause a substantial adverse change in the significance of a tribal cultural resource inadvertently discovered during construction?	PSU	Impact TCR-3, pp. 4.11-10				

¹PSU= Potentially significant impact

Project Name

²NA: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Tribal Cultural Resource Impacts: Would the project result in other impacts to tribal cultural resources that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion	
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐	

Discussion

Impact TCR-1

Impact TCR-2

Impact TCR-3

New Tribal Cultural Resource Impacts

XIX. UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact UTL-1: 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?	LTS	Impact UTL-1, pp. 4.12-10				
Impact UTL-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	Impact UTL-2, pp. 4.12-10				
UTL-3: 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?	LTS	Impact UTL-3, pp. 4.12-11				
UTL-4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTS	Impact UTL-4, pp. 4.12-11				
UTL-5: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	LTS	Impact UTL-4, pp. 4.12-11				

¹LTS= Less than significant impact²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Utilities and Service System Impacts: Would the project result in other impacts to utilities and service systems that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?		☐ Yes	☐ No	If yes, complete row(s) below and discussion
		Potentially Significant	Less Than Significant with	Less than Significant

Project Name

		Mitigation Incorporated	
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact UTL-1

Impact UTL-2

Impact UTL-3

Impact UTL-4

New Impacts to Utilities and Service Systems

XX. WILDFIRE

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR ¹	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project ²	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
FIRE-1: Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	Impact FIRE-1, pp. 4.13-11 – 4.13-12				
FIRE-2: Due to slope, prevailing winds, and other factors, the project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LTS	Impact FIRE-2, pp. 4.13-12 – 4.13-13				
FIRE-3: 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?	LTS	Impact FIRE-3, pp. 4.13-13				
FIRE-4: Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LTS	Impact FIRE-4, pp. 4.13-14				

¹LTS= Less than significant impact²N/A: not applicable; there are no MMs identified in the PEIR for this impact. None: there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Wildfire Impacts: Would the project result in other impacts related to wildfire that are not evaluated in the County of Tuolumne Broadband Infrastructure PEIR?	☐ Yes	☐ No	If yes, complete row(s) below and discussion			
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant			
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐			

Discussion**Impact FIRE-1**

Impact FIRE-2

Impact FIRE-3

Impact FIRE-4

New Impacts to Wildfire

5.0 Preparers

List of Preparers

6.0 References

References follow the “name-year” sequence of the Council of Science Editors (CSE) style:

http://writing.wisc.edu/Handbook/DocCSE_NameYear.html#examples.