CEQA FINDINGS OF FACT
for the
El Dorado County Broadband Fiber Project

I. INTRODUCTION

The El Dorado County Board of Supervisors (the Board), in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the El Dorado County Broadband Fiber Project (referred to as the "Project"). This document has been prepared in accordance with the California Environmental Quality Act (CEQA; Public Resources Code [PRC], Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Tit. 14, Section 15000 et seq.).

II. STATUTORY REQUIREMENTS FOR FINDINGS

PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same section provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (PRC Section 21002.) Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving a project for which an Environmental Impact Report (EIR) is required (see PRC Section 21081(a); CEQA Guidelines, Section 15091(a)). For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR (CEQA Guidelines, Section 15091(a); PRC Section 21081(a)).

PRC Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors". See also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565.

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects" (CEQA Guidelines, Section 15093, 15043(b); see also PRC Section21081(b)).

The Board issues these findings to document its independent judgment regarding the potential environmental effects analyzed in the Final Program EIR (Final PEIR) and to document its reasoning for approving the Project.

III. BACKGROUND AND PROJECT DESCRIPTION

A. Project Location

The Project is located within the unincorporated areas of the County and within the two incorporated cities of the County, the cities of Placerville and the City of South Lake Tahoe. The majority of future fiber optic broadband infrastructure would be constructed within typical roadway cross-section within the County, cities, or California Department of Transportation's (Caltrans') public rights-of-way (ROW). However, broadband infrastructure could also be constructed on private disturbed land and federal land and could connect to existing conduit or utility poles located within public or private utility easements. The exact alignment of future broadband infrastructure is currently unknown at this time and would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

B. Project Objectives

Per Section 15124 of the CEQA Guidelines, the County identified the following objectives for the Project:

- Promote the construction of a broadband network in unincorporated and incorporated areas of El Dorado County;
- Enable an increase in telework and telecommuting, with a correlated decrease in vehicle miles traveled;
- Improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies;
- Streamline the environmental review process for individual fiber projects that are implemented in the County;
- Identify known environmental and cultural assets to be protected and/or restored with an approved set of preservation measures and/or mitigations; and,
- Save time and money for both El Dorado County and individual fiber project applicants, resulting in greater government and economic efficiencies, reducing the amount of County staff time required to review individual fiber projects and avoiding duplication of applicant costs.

C. Project Description

The County is proposing to expand access to fiber optic broadband technology throughout the unincorporated areas and incorporated cities within the County. The Project would install fiber optic lines either underground in buried conduits, overhead on existing or newly constructed utility poles, or in a combination of both. It is anticipated that the depth of excavation for buried conduits would be 5 feet. Additionally, the maximum height of utility poles would be 100 feet. The majority of future broadband infrastructure would be constructed within the typical roadway cross-section within the unincorporated areas of the County, the incorporated cities of Placerville and South Lake Tahoe, or Caltrans' public ROW. However, broadband infrastructure could also be constructed on private disturbed land and federal land. The exact alignment of future broadband infrastructure is currently unknown at this time and would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources.

Underground fiber optic conduit or aboveground utility poles would typically be located in previously disturbed and/or developed areas (e.g., in ROW). Many of these fiber optic conduits or utility poles 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. The fiber optic infrastructure could follow other utility installations; therefore, it is likely that the ground along these alignments has been previously disturbed by prior utility work. The Final PEIR conservatively assumes that new ground disturbance would be required for the entire Project; however, there would be potential for utilizing existing conduit or utility poles where only installation of fiber optic lines would be required. If deemed feasible, the new broadband infrastructure constructed under the Project would connect to existing broadband infrastructure (e.g., aboveground, and belowground) in the County supported by existing ISPs.

IV. ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15082 of the CEQA Guidelines, the County issued a Notice of Preparation (NOP) for the Draft PEIR on August 29, 2024, and held an in-person public scoping meeting on Wednesday, September 25, 2024, to receive agency and public comments. The scoping period for the Draft PEIR started on August 29, 2024, and ended on September 30, 2024, during which time responsible agencies and interested members of the public were invited to submit comments as to the scope and content of the Draft PEIR. Pursuant to CEQA Guidelines sections 15023(c), and 15087(f), the State Clearinghouse in the Governor's Office of Land Use and Climate Innovation was responsible for distributing the document to State agencies, departments, boards and commissions for review and comment. The County followed required procedures with regard to distribution of the appropriate notices and environmental documents to the State Clearinghouse. The State Clearinghouse made that information available to interested agencies for review and comment.

The Native American Heritage Commission (NAHC) submitted a comment letter on August 30, 2024, recommending tribal consultation in accordance with Senate Bill (SB) 18, Assembly Bill (AB) 52, and any other applicable laws. During the preparation of the Draft PEIR, the County reached out to seven local tribes with an opportunity to consult under AB 52. The County received a response from one tribe, UAIC, on January 3, 2025 via email. UAIC requested to consult under AB 52 to discuss the contents of Section 4.18, Tribal Cultural Resources, of the Draft PEIR, and requested additional information regarding the project-specific broadband routes. The County responded to UAIC on January 8, 2025 via email to clarify that due to the programmatic nature of

the proposed project, project-specific broadband routes are currently unknown. The County's response noted that the Draft PEIR will include Mitigation Measure TCR-1 to address potential impacts to TCRs for each individual fiber project that tiers off of the PEIR; specifically, each individual fiber project would be required to initiate AB 52 consultation, which would provide UAIC the opportunity to review project-specific routes and consider engaging in consultation when project location and activity information is available for a future individual broadband fiber project. The County did not receive a subsequent response from UAIC, and as such, tribal consultation is complete. No other responses have been received as of May 2025.

The California Department of Transportation (Caltrans) submitted a comment letter on September 25, 2024, recommending that future individual fiber projects that would take place along or within the State's ROW obtain an encroachment permit issued by Caltrans. The County and/or project applicant would submit an encroachment permit application to Caltrans for approval if any construction is proposed within Caltrans ROW prior to the commencement of construction activities. The need for a Caltrans encroachment permit for any proposed work within Caltrans ROW was included in Section 3.6, Potential Permits and Approvals Required, of the Draft PEIR.

The Central Valley Regional Water Quality Control Board (CVRWQCB) submitted a form letter on September 30, 2024, summarizing the CVRWQCB's basin plan, antidegradation considerations, and permitting requirements. Section 3.6, Potential Permits and Approvals Required, of the Draft PEIR included language about filing a Notice of Intent with the CVRWQCB if an individual fiber project would disturb more than 1 acre of soil and require a Construction General Permit.

The Draft PEIR was available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting on March 14, 2025, and ending on April 28, 2025. During the comment period, the public was invited to submit written comments on the Draft PEIR via mail or e-mail to El Dorado County. One agency comment letter from the California Department of Fish and Wildlife (CDFW) was submitted via email on April 28, 2025. Upon completion of the 45-day review period for a Draft PEIR, the County reviewed the comment received from CDFW and prepared a written response for the comment. The Final PEIR consists of the comment received on the Draft PEIR, the response to the comment, and describes any changes to the Draft PEIR that have resulted from the comment received. The Final PEIR was issued May 2025.

V. RECORD OF PROCEEDINGS

In accordance with PRC Section 21167.6(e), the record of proceedings for the Board's decision to approve the Project includes the following documents at a minimum:

- The NOP and all other public notices issued by the County in conjunction with the Draft PEIR, as well as all comments submitted by agencies or members of the public during the comment period on the NOP;

- The Draft PEIR and all appendices;

- All comments submitted by agencies or members of the public during the comment periods on the Draft PEIR;

- All comments and correspondence submitted to the County with respect to the Project, including comments submitted subsequent to the release of the Final PEIR;

- The Final PEIR, including responses to comments on the Draft PEIR, and appendices;
- Documents cited or referenced in the Draft PEIR and the Final PEIR;
- All recommendations and findings adopted by the Board of Supervisors in connection with the Project and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the County, consultants to the County, or responsible or trustee agencies with respect to the County's compliance with the requirements of CEQA and with respect to the County's action on the Project;
- Matters of common knowledge to the County, including, but not limited to federal, State, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to CEQA Guidelines Section 15091(e), the documents constituting the record of proceedings are available for review during normal business hours at the El Dorado County Economic Development Department, 2850 Fairlane Court, Placerville, CA 95667. The custodian of these documents is Kyle Zimbelman.

VI. MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Project and is included in the same Resolution that adopts these Findings. The County will use the MMRP to track compliance with project mitigation measures. The MMRP will remain available for public review during the compliance period. The Final MMRP is included as Appendix B of the Final PEIR, and is approved in conjunction with certification of the PEIR and adoption of these Findings of Fact.

VII. FINDINGS FOR DETERMINATIONS OF NO IMPACT OR LESS THAN SIGNIFICANT IMPACT

The Board has reviewed and considered the information in the Draft PEIR and the Final PEIR addressing potential environmental effects, proposed mitigation measures, and alternatives. The Board, relying on the facts and analysis in the Draft PEIR and the Final PEIR, which were presented to the Board and reviewed and considered prior to any approvals, concurs with the conclusions of the Draft PEIR and the Final PEIR regarding the potential environmental effects of the Project.

The Board concurs with the conclusions in the Final PEIR that a less than significant impact or no impact would occur for all of the following environmental issues areas:

- Agriculture and Forestry Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions

- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

VIII. SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The Draft PEIR identified a number of potentially significant impacts that would occur as a result of Project implementation. All of these potentially significant impacts can be fully mitigated to less-than-significant levels through implementation of the mitigation measures identified in the PEIR and presented below.

A. Findings for Impacts Mitigated to Less Than Significant

This section includes the Project's direct and indirect impacts as well as cumulative impacts. The text in this section does not attempt to describe the full analysis of each environmental impact contained in the Draft PEIR. Instead, this section provides a summary description of each impact, describes the applicable mitigation measures identified in the Draft and Final PEIR and adopted by the Board, and states the Board's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Draft and Final PEIR, and the Board hereby incorporates by reference into these Findings the discussion and analysis in those documents supporting Final PEIR's determinations. In making these Findings, the Board ratifies, adopts, and incorporates into the Findings and analyses and explanations in the Draft and Final PEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these Findings.

The Board has adopted all of the mitigation measures identified herein.

1. Aesthetics

Impact AES-1: The Project has the potential to adversely affect a scenic vista.

> **Explanation:** The installation of new underground fiber conduit or fiber optic line in existing conduit would not be visible and would therefore have no substantial adverse effect on scenic vistas. However, individual fiber projects could be installed overhead on existing or newly constructed utility poles within viewsheds of the designated Emerald Bay/Vikingsholm and Christmas Valley vista points located along SR 89. Although many of the roadways within the Project area are currently lined with tall vertical features (e.g., mature trees, utility poles, streetlights, and roadway signs) and horizontal features (e.g., building and pavement edges, fences, and utility lines), scenic vistas in the County could be affected by the operation of aboveground individual fiber projects located within the viewshed of the scenic vista. With implementation of Mitigation Measure AES-1, project-specific impacts on scenic vistas would be reduced to less than significant. The following mitigation measure is adopted to reduce potentially significant impacts:
>
> > **Mitigation Measure AES-1: Visual Impact Assessment.** For any aboveground individual fiber project proposed within the viewshed of a designated scenic vista,

eligible State Scenic Highway, and/or designated State Scenic Highway, the project applicant shall prepare a Visual Impact Assessment (VIA) for Lead Agency review and approval. The VIA shall be prepared by a qualified professional with experience in visual resource analysis. The VIA shall evaluate the potential impacts of the project on scenic resources in accordance with the CEQA Guidelines, including but not limited to consideration of aesthetic values, visual quality, and the character of the surrounding landscape.

The VIA shall include the following components:

1. Baseline Conditions: Documentation of existing visual conditions, including photographs, renderings, and/or other visual tools to establish the project site's current view and its relationship to surrounding scenic resources.

2. Visual Simulations: Preparation of photo-realistic visual simulations depicting the project as proposed from key public viewpoints, including those within the scenic vista or from the State Scenic Highway.

3. Impact Analysis: Identification of potential impacts on scenic vistas and resources, using thresholds of significance established under CEQA Guidelines or applicable local policies.

4. Design Recommendations or Mitigation Measures: Identification of feasible design measures or project-specific mitigation measures to avoid, minimize, and/or reduce potentially significant visual impacts. These measures may include, but are not limited to:

    - Modifications to project design, height, massing, and/or orientation.
    - Use of landscaping, vegetative screening, and/or earthworks to soften visual impacts.
    - Use of non-reflective and/or neutral-colored materials to reduce visual contrast.
    - Adjustment of lighting design to prevent glare and/or light trespass into sensitive areas.

All recommendations and mitigation measures identified in the VIA and approved by the Lead Agency shall be incorporated into project plans and specifications before project approval.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure AES-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact AES-2: The Project has the potential to damage scenic resources within a State Scenic Highway.

Explanation: Individual fiber projects could be installed overhead on existing or newly constructed utility poles within the vicinity of U.S. 50, SR 89, and/or SR 88. Additionally, aboveground individual fiber projects could be installed along roadway segments and previously disturbed and/or developed areas within the County that may have scenic resources such as rivers, streams, mountains, and forests, as well as buildings of architectural value. Although the aboveground fiber optic lines on newly or previously constructed utility poles could be introduced within portions of eligible and/or designated State Scenic Highways, many of the roadways within the Project area are lined with tall vertical features (e.g., mature trees, utility poles, streetlights, and roadway signs) and horizontal features (e.g., building and pavement edges, fences, and utility lines). However, eligible and/or designated State Scenic Highways in the County could be affected by operation of aboveground individual fiber projects located within the viewshed of the highway. Implementation of Mitigation Measure AES-1, provided in detail above, would ensure that scenic resources are protected and that project-specific visual impacts are adequately addressed to reduce potential impacts to a less than significant level.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure AES-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact AES-5: The Project has the potential to contribute to a significant cumulative impact with respect to aesthetics.

Explanation: Numerous transportation projects are planned or programmed in El Dorado County, including various road maintenance and rehabilitation, road system management and operations, and bike and pedestrian infrastructure improvement projects. These transportation projects generally require temporary construction activities that are not anticipated to be cumulatively considerable as construction would be short-term and temporary. However, these transportation projects may result in permanent changes to the existing visual setting and viewsheds within the County. These projects would be required to comply with local design and zoning requirements to ensure that the existing visual character and quality is maintained within the County. Individual fiber projects under the proposed Project are not expected to combine with future transportation projects to produce a considerable contribution to cumulative impacts.

Effects on scenic resources generally occur at the interface between development and the scenic resources and tend to be localized. As discussed in Impact AES-1 and AES-2, implementation of Mitigation Measure AES-1, provided in detail above, would ensure that scenic resources are protected and that project-specific visual impacts are adequately addressed to reduce potential impacts to a less than significant level. Therefore, the proposed Project would have a less than cumulatively considerable impact related to aesthetics.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure AES-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

2. Air Quality

Impact AQ-2: The Project has the potential to contribute to a cumulatively considerable net increase of a criteria pollutant for which the Project is in non-attainment.

Explanation: The Project's daily construction emissions for each individual construction method would be significantly less than El Dorado County Air Quality Management District (EDCAQMD) and Sacramento Metropolitan Air Quality Management District (SMAQMD) daily thresholds. It is likely that construction could simultaneously occur at various individual fiber project sites, however, the daily combined construction emissions would not exceed EDCAQMD and SMAQMD thresholds. It is assumed that no more than 10 individual fiber project construction sites would be active at one time. Therefore, the Project's construction emissions would not violate any air quality standard or result in a considerable net increase of any criteria pollutant. Additionally, according to EDCAQMD's Rule 223-1, any activities associated with plans for grading and construction would require a Fugitive Dust Control Plan (FDCP). Mitigation Measure AQ-1 would require the preparation of a FDCP and implementation of all construction Best Management Practices (BMPs) included in Appendix C-1, Tables C.4 and C.5 of the 2002 EDCAQMD Guide to Air Quality Assessment. With implementation of Mitigation Measure AQ-1, impacts related to construction emissions would be less than significant. The following mitigation measure is adopted to reduce potentially significant impacts:

> **Mitigation Measure AQ-1: Prepare a Fugitive Dust Mitigation Plan.** The applicant of an individual fiber project shall submit a Fugitive Dust Control Plan (FDCP) to the Air Pollution Control Officer of the El Dorado County Air Quality Management District (EDCAQMD) prior to the start of any construction activity for which a grading permit was issued by El Dorado County or incorporated city within El Dorado County. The FDCP shall implement all construction related best management practices (BMPs) included in Appendix C-1, Tables C.4 and C.5 of the EDCAQMD Guide to Air Quality Assessment. The FDCP shall be prepared in compliance with EDCAQMD Rule 223-1. Construction activities shall not commence until the Air Pollution Control Officer has approved or conditionally approved the Fugitive Dust Control Plan.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure AQ-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact AQ-3: The Project has the potential to expose sensitive receptors to substantial pollutant concentrations.

Explanation: Asbestos dust is a known carcinogen and is classified as a Toxic Air Contaminant (TAC) by the California Air Resources Board (CARB). Some areas of the County are known to contain NOA. Individual fiber projects under the Project may be located within known areas of NOA, areas classified as more likely to contain asbestos, or within the quarter mile buffer more likely to contain asbestos or fault line. As outlined in EDCAQMD's Rule 223-2, if a professional geologist has conducted a geologic evaluation of the property and determined that no serpentine or ultramafic rock, or asbestos, is likely to be found in the area disturbed, then the Air Pollution Control Officer may provide an exemption from this Rule. If a geological evaluation has not been conducted, then an owner/operator would submit an Asbestos Dust Mitigation Plan to the Air Pollution Control Officer prior to the start of any construction activity. Mitigation Measure AQ-2 would require the preparation of an Asbestos Dust Mitigation Plan if NOA, serpentine, or ultramafic rock is discovered by the individual fiber project applicant, a professional geologist, or the Air Pollution Control Officer. With implementation of Mitigation Measure AQ-2, the impact would be less than significant. The following mitigation measure is adopted to reduce potentially significant impacts:

> **Mitigation Measure AQ-2: Prepare an Asbestos Dust Mitigation Plan.** Prior to construction, an Asbestos Dust Mitigation Plan shall be submitted to the Air Pollution Control Officer if any portion of the individual fiber project area to be disturbed is within a designated Naturally Occurring Asbestos (NOA) review area on the El Dorado County Asbestos Review Area Map, Figure 4.3-1 of the PEIR (i.e., an area designated as "Found Area of NOA", "Quarter Mile Buffer for Found Area of NOA", "More Likely to Contain Asbestos", or "Quarter Mile Buffer for More Likely to Contain Asbestos"). The Asbestos Dust Mitigation Plan shall be prepared in compliance with the El Dorado County Air Quality Management District (EDCAQMD) Rule 223-2. No construction activities shall occur until the Asbestos Dust Mitigation Plan is approved or conditionally approved by the Air Pollution Control Officer.
>
> If, prior to construction, any portion of the individual fiber project area to be disturbed is within a designated NOA review area on the El Dorado County Asbestos Review Area Map, Figure 4.3-1 of the PEIR, an exemption to the requirement for an Asbestos Dust Mitigation Plan may be granted by the Air Pollution Control Offer if a professional geologist has conducted a geologic evaluation of the property and determined that no serpentine or ultramafic rock, or asbestos, is likely to be found in the area disturbed, and a report detailing the geologic evaluation is submitted to the Air Pollution Control Offer for consideration. No construction activities shall occur until an exemption from the requirement for an Asbestos Dust Mitigation Plan is granted by the Air Pollution Control Officer.
>
> If, prior to construction (regardless of the area designation on the El Dorado County Asbestos Review Area Map, Figure 4.3-1 of the PEIR, and regardless of any previously granted exemption), the owner/operator, a professional geologist, or the Air Pollution Control Officer determines that any portion of the individual fiber project area to be disturbed has NOA, an Asbestos Dust Mitigation Plan shall be submitted to the Air Pollution Control Officer. No construction activities shall occur until the Asbestos Dust Mitigation Plan is approved or conditionally approved by the Air Pollution Control Officer.

If, during construction (regardless of the area designation on the El Dorado County Asbestos Review Area Map, Figure 4.3-1 of the PEIR, and regardless of any previously granted exemption), NOA is discovered in any portion of the individual fiber project area to be disturbed by the owner/operator, a professional geologist, or the Air Pollution Control Officer, construction shall be halted, and an Asbestos Dust Mitigation shall be submitted to the Air Pollution Control Officer. Construction activities shall not resume until the Asbestos Dust Mitigation Plan is approved or conditionally approved by the Air Pollution Control Officer.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure AQ-2, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact AQ-5: The Project has the potential to contribute to a cumulatively considerable impact on regional air quality.

Explanation: By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards in the Mountain Counties Air Basin (MCAB) or Lake Tahoe Air Basin (LTAB). Instead, a project's individual emissions of criteria pollutants and precursors contribute to existing cumulatively significant adverse air quality impacts in the EDCAQMD. The proposed Project would not result in significant impacts related to construction- or operations-related emission of criteria pollutants. EDCAQMD establishes thresholds designed to help the basin achieve state ambient air quality standards; therefore, because the proposed Project would not exceed those thresholds, the cumulative impact related to air quality is not significant. Mitigation Measure AQ-1 would require the preparation of a FDCP and implementation of all construction BMPs included in Appendix C-1, Tables C.4 and C.5 of the 2002 EDCAQMD Guide to Air Quality Assessment. With implementation of Mitigation Measure AQ-1, provided in detail above, impacts related to construction emissions would be less than significant. Mitigation Measure AQ-2 would require the preparation of an Asbestos Dust Mitigation Plan if NOA, serpentine, or ultramafic rock is discovered by the individual fiber project applicant, a professional geologist, or the Air Pollution Control Officer. Implementation of Mitigation Measures AQ-2, provided in detail above, would ensure that potential impacts from NOA released during construction of the Project would be less than cumulatively considerable.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures AQ-1 and AQ-2, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

3. Biological Resources

Impact BIO-1: The Project has the potential to adversely affect special-status species and their associated habitats.

Explanation: As 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 Project would result in a substantial adverse effect on special-status species or their associated habitats, including U.S. Fish and Wildlife Service (USFWS) designated critical habitats and/or National Marine Fisheries Services (NMFS) essential fish habitat. However, individual fiber projects would be required to prepare a biological resources assessment (BRA) that would assess the potential for occurrence and impacts to special-status species on the individual fiber project site, as outlined in Mitigation Measure BIO-1. If the BRA determines that there is the potential for impacts for special-status species, recommended mitigation measures and/or avoidance measures detailed in Mitigation Measures BIO-2 through BIO-8 shall be included in the project-specific BRA. The following mitigation measures are adopted to reduce potentially significant impacts:

Mitigation Measure BIO 1: Prepare a Site-Specific Biological Resources Assessment. Prior to approval of an individual fiber project, the applicant of an individual fiber project shall retain a qualified biologist to prepare a project-specific biological resources assessment (BRA). The project-specific BRA shall consist of data review and reconnaissance-level surveys prior to project implementation. The data reviewed will include the applicable biological resources setting, species and sensitive natural communities tables, and habitat information from Section 4.4, Biological Resources, of the Program EIR for where the project will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species' distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, USFWS and NMFS database queries, and relevant general and regional plans. Reconnaissance-level biological surveys will include general surveys and habitat assessments of project impact areas and appropriate buffers for sensitive and special-status biological resources. The qualified surveyor will 1) identify and document sensitive resources, such as riparian communities, wetlands, oak woodlands, or other sensitive habitats or designated sensitive natural communities or wildlife nursery sites or habitat, and 2) assess the suitability of habitat within the project impact area to support special-status plant and animal species. The surveyor will also record any incidental wildlife observations.

The project-specific BRA will also include an analysis of potential impacts on biological resources, and if it is determined during the biological resources assessment that special-status species are present within or adjacent to the project impact area or have the potential to occur within a project impact area, then the appropriate mitigation measures described below in Mitigation Measures BIO-2 through BIO-8 shall be recommended to avoid and/or reduce potential impacts as applicable. Potential measures for special-status species may include, but are not limited to, protocol-level surveys, nesting bird surveys, worker awareness trainings, and other focused preconstruction surveys as well as onsite biological monitoring during construction in sensitive habitats or habitats that could support special-status plants or wildlife.

If it is determined that the project has potential to impact USFWS designated critical habitat and/or NMFS essential fish habitat, then the project applicant shall coordinate with CDFW and/or USFWS, as necessary, to determine avoidance and/or mitigation and/or 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.

Mitigation Measure BIO 2: Conduct Worker Awareness Training for Applicable Special-Status Species. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1 that any special-status species have the potential to occur within a project impact area or be affected by project construction, then a qualified biologist shall provide environmental awareness training to all project-related personnel before the initiation of work. The training shall include the identification methods for the relevant potentially occurring special-status species, required best management practices to implement before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for non-compliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel will sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the biologist on-site and the project applicant.

Mitigation Measure BIO 3: Implement Mitigation Measures for Special-Status Plant Species. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1 that special-status plant species have the potential to occur within a project impact area or be affected by project construction, then the following measures shall be included in the project-specific BRA, relevant CEQA documents, and the associated MMRP to avoid and/or reduce potential impacts to special-status plants.

- Focused special-status plant surveys shall be conducted by a qualified biologist during the appropriate identification (blooming) periods before any ground disturbing activities in suitable habitat. Surveys shall be conducted as specified in this measure or according to the most current agency guidelines. If no special-status plants are observed, then a letter report documenting the survey results shall be prepared and submitted to the project applicant and El Dorado County, and no further measures are recommended.
- If special-status plants are observed within the project impact area, the location of the special-status plants shall be marked with pin flags or other highly visible markers and recorded with GPS equipment. The project applicant shall determine if the special-status plant(s) on-site can be avoided by project design or utilize construction techniques to avoid impacts to the special-status plant species. All special-status plants to be avoided shall have exclusion fencing or other highly visible material marking the avoidance area, and the avoidance area shall remain in place throughout the entire construction period. Avoidance areas shall also be marked on project plans.

- If special-status plants are found within the project impact area and cannot be avoided, the project applicant shall consult with CDFW and/or USFWS, as appropriate, to determine appropriate measures to mitigate for the loss of special-status plant populations. These measures may include gathering seed from impacted populations for planting within nearby appropriate habitat or within the project footprint after construction, topsoil salvage and replacement, preserving or enhancing existing off-site populations of the plant species affected by the project, or restoring suitable habitat for special-status plant species habitat as directed by the regulatory agencies.

Mitigation Measure BIO 4: Implement Mitigation Measures for Special-Status Aquatic Species. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1 that special-status aquatic species (Lahontan cutthroat trout, Lahontan mountain sucker, steelhead, mountain whitefish, Lahontan lake tui chub, southern long-toed salamander, Mount Lyell salamander, western spadefoot, California red-legged frog, foothill yellow-legged frog [North and South Sierra DPS], northern leopard frog, Sierra Nevada yellow-legged frog, or northwestern pond turtle) have the potential to occur within a project impact area or be impacted by construction, then the following measures shall be included in the project-specific BRA, relevant CEQA documents, and the associated MMRP to avoid and/or reduce potential impacts.

- Project applicants shall consult with the qualified biologist during the project design phase to ensure that project designs make every attempt to avoid impacts to aquatic resources through project alignment shifts, work area restrictions, construction methods, or other means.
- A qualified biologist shall map aquatic resources with a sub-meter GPS and delineate suitable aquatic habitats as described in Mitigation Measure BIO-9. These aquatic features shall have wildlife exclusion fencing installed around them prior to the start of construction. Wetland avoidance areas shall be depicted in project work plans. Fencing shall be solid fencing and not include a mesh design that could trap wildlife. Fencing shall be trenched into the soil at least six inches, and the soil must be carefully compacted against both sides of the fence for its entire length to prevent animals from entering the construction area. Exclusion fencing will be inspected daily for the duration of construction to ensure it remains intact, and any holes, tears, or gaps will be repaired immediately. Fencing will be removed upon construction completion.
- Focused surveys for special-status aquatic species (Lahontan cutthroat trout, Lahontan mountain sucker, steelhead, mountain whitefish, Lahontan lake tui chub, southern long-toed salamander, Mount Lyell salamander, western spadefoot, California red-legged frog, foothill yellow-legged frog [North and South Sierra DPS], northern leopard frog, Sierra Nevada yellow-legged frog, or northwestern pond turtle) shall be conducted by a qualified biologist according to the most current agency protocols (https://wildlife.ca.gov/Conservation/Survey-Protocols) before any ground disturbing activities in suitable habitat. If no special-status aquatic species are detected, then a letter report documenting the survey results should be prepared and submitted to the project applicant, and no further measures are recommended.

- A qualified biologist shall conduct a pre-construction survey for special-status aquatic species within 24 hours before the start of grading or land-disturbing activities. If the survey shows that there is no evidence of these species, then a letter report shall be prepared to document the survey and provided to the project applicant and El Dorado County, and no additional measures are recommended. If development does not commence within 24 hours of the survey, or halts for more than seven days, then an additional survey is required before starting or resuming work.
    - If any of these species are observed during the survey, no work shall occur within a 250-foot buffer of the species occurrence until consulting with the appropriate wildlife agencies to determine if additional mitigation and avoidance measures are required.

- A qualified biologist shall monitor construction and be present during all ground disturbance activities within suitable habitat for special-status species. If any of these special-status species are observed within the project impact area, all work shall immediately halt in the vicinity of the special-status aquatic species to allow the species to leave the area of its own will. If the special-status aquatic species is in immediate danger, the qualified biologist shall relocate the species outside of the construction zone, at a safe distance from all construction-related activities, and within suitable habitat as approved by the wildlife agencies. No one other than the qualified biologist shall handle, take, or otherwise harass the aquatic species. No work within a 250-foot buffer of the species occurrence shall resume until the aquatic species has left the project impact area or been relocated from areas of potential disturbance.

Mitigation Measure BIO 5: Implement Mitigation Measures for Coast Horned Lizard. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1 that coast horned lizard has the potential to occur within a project impact area or be impacted by construction, then the following mitigation measures shall be included in the project-specific BRA, relevant CEQA documents, and the associated MMRP to avoid and/or reduce potential impacts.

- A qualified biologist shall conduct a pre-construction survey for coast horned lizard within 24 hours before the start of grading or land-disturbing activities. Surveys shall be conducted as specified in this measure or according to the most current agency guidelines. If the survey shows that there is no evidence of this species, then a letter report shall be prepared to document the survey and provided to the project applicant and El Dorado County, and no additional measures are recommended. If development does not commence within 24 hours of the survey, or halts for more than seven days, then an additional survey is required before starting or resuming work.
    - If any coast horned lizards are observed during the survey, no work shall occur until CDFW has been consulted to determine appropriate mitigation and avoidance measures.

- A qualified biologist shall monitor construction and be present during ground disturbance activities within suitable habitat. If coast horned lizards are observed within the project impact area during work, all work shall immediately halt in the vicinity of the observation to allow the lizard to leave the area of its own will. If the lizard is in immediate danger, the qualified biologist shall relocate the lizard outside of the construction zone, at a safe distance from all construction-related activities, and within suitable habitat as approved by CDFW. No one other than the qualified biologist shall handle, take, or otherwise harass the animal. No work within a 250-foot buffer of the species occurrence shall resume until the animal has moved or been removed from areas of potential disturbance.

Mitigation Measure BIO 6: Implement Mitigation Measures for Special Status Bird Species and Other Nesting Birds. Active nests are protected by the California Fish and Game Code Section 3503.5 and the MBTA. Construction activities could result in disturbance of nest sites through temporary increases in ambient noise levels and increased human activity. In addition, vegetation clearing operations, including pruning or the removal of trees and shrubs, could impact nesting birds if these activities occur during the nesting season (February 1 to August 31). All vegetation clearing, including removal of trees and shrubs, shall be completed between September 1 and January 31, if feasible. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1, that special-status bird species and other nesting birds have the potential to occur within a project impact area or be impacted by construction, then the following mitigation measures shall be included in the project-specific BRA, relevant CEQA documents, and the associated MMRP to avoid and/or reduce potential impacts.

- If construction activities are proposed to begin during the non-breeding season (September 1 through January 31), a survey is not required, and no further studies are necessary.

- If vegetation removal and grading activities begin during the nesting season (February 1 to August 31), the project applicant shall require that a qualified biologist conduct a pre-construction survey of the project impact area for active nests. Additionally, the surrounding 500 feet should be surveyed for active raptor nests, where accessible. The pre-construction survey should be conducted within 7 days before the commencement of ground-disturbing activities. Surveys shall be conducted as specified in this measure or according to the most current agency guidelines. If the pre-construction survey shows that there is no evidence of active nests, a letter report shall be prepared to document the survey, and no additional measures are recommended. If construction does not commence within 7 days of the pre-construction survey, or halts for more than 7 days, an additional survey is required before starting work.

- If nests are found during construction activities and considered to be active, the qualified biologist shall establish buffer zones to prohibit construction activities and minimize nest disturbance until the young have successfully fledged. Buffer width will be determined by the qualified biologist and will depend on the species in question, surrounding existing disturbances, and

specific site characteristics, but may range from 20 feet for some songbirds to 250 feet for most raptors. If active nests are found within any trees slated for removal, then an appropriate buffer shall be established around the trees and the trees will not be removed until the qualified biologist determines that the nestlings have successfully fledged.

Mitigation Measure BIO 7: Implement Mitigation Measures for Special-Status Bat Species. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1 that special-status bat species (pallid bat or Townsend's big eared bat) have the potential to occur within a project impact area or be impacted by construction, then the following mitigation measures shall be included in the project-specific BRA, relevant CEQA documents, and the associated MMRP to avoid and/or reduce potential impacts.

- The project applicant shall require that a qualified biologist conduct a pre-construction survey within 7 days before clearing or grading operations. Surveys shall be conducted as specified in this measure or according to the most current agency guidelines. If no bats are observed, a letter report should be prepared and submitted to the project applicant and El Dorado County to document the survey, and no additional measures are recommended. If construction does not commence within 7 days of the pre-construction survey, or halts for more than 7 days, an additional survey shall be completed before starting work.

- If bats are present and roosting on or within 100 feet of the project impact area, then the qualified biologist shall establish an appropriate buffer around the roost site. At minimum, no trees or structures shall be removed until the biologist has determined that the bat is no longer roosting in the tree or structure. Additional mitigation measures for bat species, such as the installation of bat boxes or alternate roost structures, would be recommended if special-status bat species are found to be roosting within the project impact area.

Mitigation Measure BIO-8: Implement Mitigation Measures for Other Special-Status Mammal Species. If it is determined during the preparation of the project-specific BRA prescribed in Mitigation Measure BIO-1, that special-status mammal species (Sierra Nevada mountain beaver, Sierra Nevada snowshoe hare, Sierra Nevada red fox, fisher, wolverine, or American badger) have the potential to occur within a project impact area or be impacted by construction, then the following mitigation measures shall be included in the project-specific BRA, relevant CEQA documents, and the associated MMRP, to avoid and/or reduce potential impacts.

- Focused surveys for special-status mammal species (Sierra Nevada mountain beaver, Sierra Nevada snowshoe hare, Sierra Nevada red fox, fisher, wolverine, or American badger) shall be conducted by a qualified biologist as appropriate and following the most recent agency protocol (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281285-mammals) before any ground disturbing activities in suitable habitat. Focused survey methods may include camera trapping or the use of track plates over extended periods of time. If no special-status mammals are detected, then a letter report documenting the survey results shall be

prepared and submitted to the project applicant, and no further measures are recommended.

- A qualified biologist shall conduct a preconstruction survey for special-status mammals no more than 7 days prior to the beginning of ground disturbance related to construction activities, or any other project activity likely to impact them (such as staging, mowing, vegetation clearing), to determine if there are any mammal dens on the project site. If there are no mammal dens on the project site, no further mitigation is necessary. If dens are located within the work area and cannot be avoided, a qualified biologist shall determine if the dens are occupied. If unoccupied, the dens shall be collapsed under the supervision of the biologist. If occupied, the biologist shall determine if it is a natal/pupping den or a solitary badger den. Dens of solitary individuals may be collapsed under the supervision of the biologist once the animal has vacated the den. Natal/pupping dens shall be avoided by establishment of an exclusion zone around the den, the size of the exclusion zone shall be determined by the qualified biologist on site, until the young are old enough to leave the den and survive on their own.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures BIO-1 through BIO-8, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact BIO-2: The Project has the potential to adversely affect a sensitive natural community.

Explanation: It is anticipated that individual fiber projects would be primarily located within previously disturbed and/or developed areas (e.g., in ROW or public utility easement), and it is unlikely that the Project would result in a substantial adverse effect on sensitive natural communities. However, if sensitive natural communities would be impacted by project implementation, then the impact would be potentially significant. With the implementation of Mitigation Measure BIO-9, potential impacts to jurisdictional waters, wetlands, and/or sensitive natural communities that may occur within the Project area would be reduced to less than significant. With the implementation of Mitigation Measure BIO-10, potential impacts to oak resources that may occur within the Project area would be reduced to less than significant. The following mitigation measures are adopted to reduce potentially significant impacts:

Mitigation Measure BIO-9: 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 U.S. Army Corps of Engineers (USACE), CDFW, and the Regional Water Quality Control Board (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's *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-10: Oak Resources Inventory. If 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 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.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures BIO-9 and BIO-10, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact BIO-3: The Project has the potential to affect State or federally protected wetlands or other waters of the U.S. or State.

Explanation: As 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 Project would result in a substantial adverse effect on State or federally protected aquatic resources. However, potential impacts to State or federally protected aquatic resources would be addressed by avoidance and/or mitigation measures stipulated by regulatory permits as required by Mitigation Measure BIO-9, which is provided in detail above.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure BIO-8, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact BIO-4: The Project has the potential to indirectly interfere with the movement of native resident wildlife species or within established native resident or migratory wildlife corridors.

Explanation: El Dorado County is a rural county that currently provides extensive open, dispersal habitat for wildlife movement in the Project area. The proposed Project would install fiber optic conduit underground, aboveground on overhead pole lines, or a combination of both. Implementation of the Project is unlikely to substantially interfere with the movement or wildlife or interfere with the functionality of wildlife corridors; however, potential impacts to the movement of native resident wildlife species or wildlife corridors would be addressed in the project-specific BRA to be prepared as required by Mitigation

Measure BIO-1 and in the species specific avoidance measures described in Mitigation Measures BIO-2 through BIO-8. With implementation of Mitigation Measure BIO-1 through BIO-8, provided in detail above, the impact would be less than significant. The following mitigation measures are adopted to reduce potentially significant impacts:

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures BIO-1 through BIO-8, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact BIO-5: The Project has the potential to conflict with local policies or ordinances protecting biological resources.

Explanation: If is determined during the biological resources assessment that a project would result in impacts to oak resources, then the County may require mitigation for impacts to oak resources or regulated individual oak trees. While some individual oak trees could be damaged by projected development under the Project, the scope of premature removals cannot be anticipated based on the programmatic level of analysis of the PEIR. As noted in Mitigation Measure BIO-10, individual fiber projects that would result in impacts to oak resources may be required to conduct an oak tree inventory to determine if mitigation is needed. The proposed Project would not conflict with any other local policies or ordinances protecting biological resources. Implementation of Mitigation Measures BIO-1 and BIO-10, provided in detail above, would reduce potentially significant impacts to a less-than-significant level.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure BIO-1 and BIO-10 which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact BIO-7: The Project has the potential to contribute to a significant cumulative impact with respect to biological resources.

Explanation: The proposed broadband infrastructure is anticipated to be within previously disturbed and/or developed areas (e.g., in ROW or public utility easements). However, given that the exact alignment of the future broadband infrastructure is currently unknown, there is the potential that some of the locations for future Project components may support sensitive biological resources. In general, a project's potential impacts related to sensitive biological resources depend on the specific project site and whether it supports sensitive natural communities, special-status species, and/or aquatic resources. As discussed above, the proposed Project would have potential impacts to special-status species, sensitive natural communities, or State or federally protected aquatic resources and/or conflict with local policies which would be reduced to less than significant levels by the implementation of Mitigation Measures BIO-1 through BIO-10, provided in detail above.

Numerous transportation projects are planned or programmed in El Dorado County, including various road maintenance and rehabilitation, road system management and operations, and bike and pedestrian infrastructure improvement projects. The projects listed as part of this cumulative analysis would also be subject to CEQA review and would be required to comply with any mitigation measures identified as necessary to reduce potential impacts to biological resources. Therefore, the proposed Project is not expected to make a cumulatively considerable contribution to losses of sensitive biological resources in El Dorado County.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures BIO-1 through BIO-10, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

4. Cultural Resources

Impact CUL-2: The Project has the potential to cause a substantial adverse change in the significance of an archaeological cultural resource that qualifies as a historical resource or unique archaeological resource pursuant to Section 15064.5.

Explanation: Because archaeological cultural resources are non-renewable, project-related disturbance can impede or destroy their ability to convey their significance, which can embody scientific and/or traditional cultural value. Should that occur, a significant effect on the environment could result.

Implementation of Mitigation Measure CUL-1 contains measures that would identify potential archaeological resource impact scenarios, would seek to avoid impacts to such resources if feasible, and would mitigate those impacts that cannot be avoided through Project design. Avoidance is the preferred method of mitigation under CEQA (CEQA Guidelines Section 15370), and ideally archaeological resources that have been determined to be significant should be preserved in place to prevent the loss of their scientific and/or heritage values. When avoidance is not feasible, the loss of scientifically and culturally consequential data would be offset by an archaeological mitigation program of excavation, analysis, and documentation of information. With implementation of Mitigation Measure CUL-1, the impact would be less than significant. The following mitigation measure is adopted to reduce potentially significant impacts:

Mitigation Measure CUL-1: Archaeological Cultural Resources Investigations

Preconstruction Screening Identification

Prior to each phase of individual fiber projects, including installation and/or use of appurtenant structures, unpaved staging areas, and fiber optic line, El Dorado County shall request a records search for all project footprints for construction activities that require ground disturbance in areas that have not been previously subject to such disturbance. For those areas of native, unpaved soil that have not been adequately surveyed for archaeological cultural resources in the past, 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 on 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.

Known Resource Conflicts

In the event that the records search described above identifies archaeological cultural resources that would be subject to a project-related impact, the County shall evaluate the status of the resource under CEQA. The archaeological 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.
- 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 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 individual fiber project implementation. The Phase III data recovery program shall include all or a combination of the following methods:

- 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.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure CUL-1, which has been required or incorporated into the project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect as identified in the Final PEIR.

Impact CUL-3: The project has the potential to cause a substantial adverse change in the significance of archaeological cultural resources that are accidentally discovered during project construction.

Explanation: Archaeological cultural resources encountered during individual fiber project construction may qualify as significant under CEQA for their ability to contain historically important information, or for their value to descendant communities as expressions of their cultural heritage and patrimony. Because archaeological cultural resources are non-renewable, their disturbance by Project implementation can impede or destroy their ability to convey their significance, which can be embodied as scientific and/or traditional cultural value. Should that occur, a significant effect on the environment could result.

Mitigation Measure CUL-2 contains measures that would identify potential archaeological cultural resource impact scenarios, seek to avoid impacts to such resources if feasible, and mitigate those impacts that cannot be avoided through individual fiber project redesign. Avoidance would prevent the loss of scientific and/or heritage values of the resource, and archaeological mitigation would offset the loss of scientifically consequential data through a program of excavation, analysis, and documentation of information would otherwise be lost. With implementation of Mitigation Measure CUL-2, the impact would be

less than significant. The following mitigation measure is adopted to reduce potentially significant impacts:

> **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-era dumpsites. If the resources cannot be avoided during the remainder of construction, a consulting archaeologist who meets the Secretary of the Interior's *Professional Qualifications Standards* for archaeology shall assess the resource and provide appropriate management recommendations. The County shall implement those recommendations to avoid or substantially reduce the severity of impacts on significant resources.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure CUL-2, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the FEIR.

Impact CUL-5: The project has the potential to contribute to a significant cumulative impact with respect to cultural resources.

> **Explanation:** Cumulative cultural resource impacts may occur when a series of actions lead to the loss of historically or archaeologically significant type of site, building, deposit, or tribal cultural resource. For example, while the loss of a single historic building may not be significant to the character of a neighborhood or streetscape, continued loss of such historical resources on a project-by-project basis could amount to a significant cumulative effect. Mitigation measures conducted for each cumulative individual fiber project would ensure that impacts on cultural resources are minimized to the maximum extent feasible. As discussed above under Impact CUL-1 through CUL-4, implementation of the proposed Project would result in a less than significant impact on cultural resources with implementation of Mitigation Measure CUL-1 and Mitigation Measure CUL-2, provided in detail above.
>
> **Significance with Mitigation:** Less Than Significant Impact.

Finding: Implementation of Mitigation Measures CUL-1 and CUL-2, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the FEIR.

5. Hazards and Hazardous Materials

Impact HAZ-2: The Project has the potential to 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.

> **Explanation:** Some areas of the County area are known to contain NOA. As outlined in EDCAQMD Rule 223-2, if a professional geologist has conducted a geologic evaluation of the property and determined that no serpentine or ultramafic rock, or asbestos, is likely to be found in the area disturbed, then the Air Pollution Control Officer may provide an exemption from this Rule. If a geological evaluation has not been conducted, then an owner/operator would submit an Asbestos Dust Mitigation Plan to the Air Pollution Control Officer prior to the start of any construction activity. Mitigation Measure AQ-2, provided in detail above, would require the preparation of an Asbestos Dust Mitigation Plan if NOA, serpentine, or ultramafic rock is discovered by the individual fiber project applicant, a professional geologist, or the Air Pollution Control Officer.
>
> **Significance with Mitigation:** Less Than Significant Impact.

Finding: Implementation of Mitigation Measure AQ-2, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

Impact HAZ-6: The Project has the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

> **Explanation:** Construction of individual fiber projects may require temporary lane closures, which have the potential to impede or interfere with emergency access routes or services. Coordination with local agencies (e.g., CHP, Caltrans, and local police and fire departments) for any necessary and temporary road closures would be required, especially for construction within designated emergency access routes or in areas that would impede or otherwise affect evacuation and emergency access or services. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project would be required to develop and implement a Traffic Control and Detour Plan as outlined in Mitigation Measure TRA-1. Depending on the location of individual fiber projects, an Encroachment Permit application would be submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3 for review and approval. Any construction on BLM land would require the ROW acquisition, and any construction on USFS land would require a construction easement. Any construction on private land would require applicable building permits. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along ROW, and would be subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits. The following mitigation measure is adopted to reduce potentially significant impacts:

Mitigation Measure TRA-1: Traffic Control and Detour Plan. Prior to the issuance of an encroachment permit, a Traffic Control and Detour Plan shall be developed for individual fiber projects that would require an encroachment permit for construction activities along ROW to manage traffic during construction. The applicant shall consult with the Lead Agency and/or Caltrans prior to initiation of construction activities that may affect area traffic (such as construction staging necessitating lane closure, trenching, etc.) to ensure that the Traffic Control and Detour Plan is prepared in conformance with applicable code and ordinance requirements for emergency access. The construction contractor shall implement appropriate traffic controls identified in the Traffic Control and Detour Plan in accordance with the California Vehicle Code and other State and local requirements to avoid or minimize impacts on traffic during construction. The Traffic Control and Detour Plan shall be submitted to the agency responsible for issuing the encroachment permit for review and approval prior to the commencement of construction activities.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact HAZ-8: The Project has the potential to contribute to a significant cumulative impact with respect to hazards and hazardous substances.

Explanation: If it is determined that an individual fiber project may be located near or on a hazardous materials site, a Phase I Environmental Site Assessment (ESA) would be required to be prepared to evaluate and address potential exposure. Additionally, if an individual fiber project would be located within an area of the County known to contain NOA and a geological evaluation has not been conducted, then an owner/operator would be required to submit an Asbestos Dust Mitigation Plan to the Air Pollution Control Officer prior to the start of any construction activity. Mitigation Measure AQ-2, provided in detail above, would require the preparation of an Asbestos Dust Mitigation Plan if NOA, serpentine, or ultramafic rock is discovered by the individual fiber project applicant, a professional geologist, or the Air Pollution Control Officer. Implementation of Mitigation Measures AQ-2 would ensure that potential impacts from NOA released during construction of the Project would be less than cumulatively considerable.

To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as stipulated in Mitigation Measure TRA-1. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required to be employed for all construction activities along ROW, and would be subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits. With implementation of TRA-1, which is provided in detail above and requires preparation of a Traffic Control and

Detour Plan, potentially significant impacts related to an adopted emergency response or emergency evacuation plan from construction of individual fiber projects along ROW would be less than cumulatively considerable.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures AQ-2 and TRA-1, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the potentially significant environmental effect as identified in the Final PEIR.

6. Noise

Impact NOI-1: The Project has the potential to 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 General Plan.

Explanation:

Construction Noise

Construction noise from the development of individual fiber projects would be temporary and short term as construction occurs intermittently and varies depending on the nature or phase of construction (e.g., horizontal directional drilling, plowing, trenching, microtrenching, line installation, aerial stringing, and pavement repair). Construction equipment would vary by construction method, but the construction process could include operation of the following types of equipment: pickup/utility trucks, horizontal drill rigs, auger drill rigs, cranes, generators, excavators, backhoes, dozers, air compressors, trenchers, concrete saws, vibratory rollers, dump trucks, and Man Lifts. Noise generated from these pieces of equipment would be temporary and intermittent as typical use is characterized by short periods of full power operation followed by extended periods of lower power, idling, or powered-off conditions.

Construction activities would be limited to the less noise-sensitive hours (e.g., daytime) from 7:00 a.m. to 7:00 p.m., Monday through Friday, from 8:00 a.m. and 5:00 p.m. on weekends, and federally recognized holidays, and therefore would be exempt from noise standards consistent with the County Maximum Allowable Noise Exposure For Non-Transportation Noise Sources In Community Regions And Adopted Plan Areas–Construction Noise (County 2019). Mitigation Measure NOI-1 would be implemented to restrict the Project construction activity hours. With implementation of Mitigation Measure NOI-1, the Project would not exceed the applicable County construction noise standards, and the impact would be less than significant.

Operational Noise

Some remote sites could include the use of generators to provide power for emergency communications during power outages. Specific types of generators that would be installed are unknown. A typical backup generator for a communications site is a Polar Power 15-kilowatt diesel- or natural gas-powered generator housed in an enclosure which has a rated sound level of 66.2 dBA measured at 23 feet. Noise from routine maintenance

and testing of any project emergency generators would be subject to County Ordinance Chapter 9.16, which prohibits loud or raucous noises which unreasonably interfere with the peace and quiet of another's private property. Emergency generators are typically run for maintenance and testing for 15 to 30 minutes during daytime hours, several times per month. A generator producing 66.2 dBA for 30 minutes in one hour would result in 63.2 dBA L_{EQ} at a distance of 23 feet. Per the El Dorado County General Plan Goal 6.5, project noise would be significant if daytime noise (between 7 a.m. and 7 p.m.) would exceed 55 dBA L_{EQ} in community areas and 50 dBA L_{EQ} in rural areas, measured at NSLU outdoor use areas or building facades.

Therefore, project emergency backup generators located within 60 feet of a NSLU in a community area or within 105 feet of an NSLU in a rural area would result in stationary source noise exceeding the daytime County standard of 55 dBA L_{EQ} for community areas and 50 dBA L_{EQ} for rural areas. Mitigation Measure NOI-2 would require emergency backup generators to be located away from any NSLU or provide sound reduction measures to reduce noise from generators. The following mitigation measures are adopted to reduce potentially significant impacts:

Mitigation Measure NOI-1: Construction Hours. Construction activities shall not occur outside the hours of 7:00 a.m. and 7:00 p.m., Monday through Friday, or outside the hours of 8:00 a.m. and 5:00 p.m. on weekends, or at all on federally recognized holidays. Prior to starting construction activities, the project applicant or construction contractor shall post a publicly visible sign at the entrance to the individual fiber project site listing the allowable construction hours and the contact information, including telephone numbers, to report noise violations to the County and the contractor.

Mitigation Measure NOI-2: Backup Generator Noise Control. Prior to approving individual fiber projects that require an emergency back generator, the County shall verify project plans including the following:

- Where feasible, emergency backup generators shall be installed no closer than 60 feet from any noise sensitive land use (NSLU; e.g., residences, schools, hospitals, convalescent homes, churches, libraries) in a community area, and no closer than 105 feet from any NSLU in a rural area. If it is not feasible to locate emergency generators 60 feet or more from NSLU in community areas or 105 feet or more from NSLUs in rural areas, 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 L_{EQ} 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.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure NOI-1 and NOI-2, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact NOI-2: The Project has the potential to result in the generation of excessive groundborne vibration levels.

Explanation: Project construction activities would not require activities known to generate excessive ground-borne vibration, such as pile driving or blasting. A possible source of vibration during general Project construction activities would be a vibratory roller used for gravel or pavement compaction. A large vibratory roller can create approximately 0.210 inch per second PPV at 25 feet (Caltrans 2020). Specific locations where vibratory rollers could be used during Project construction have not been identified. However, construction vibration impacts would be potentially significant if a vibratory roller were used: within 15 feet of an occupied building (exceeding 0.4 inch per second PPV); within 18 feet of an older residential building (exceeding 0.3 inch per second PPV); or within 60 feet of a fragile historical building, ruin, or ancient monument (exceeding 0.08 inch per second PPV).[1] The following mitigation measure is adopted to reduce potentially significant impacts:

Mitigation Measure NOI-3: Vibratory Roller Use. Prior to issuing individual project construction approvals or permits, the County shall ensure 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.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure NOI-3, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact NOI-4: The Project has the potential to contribute to a cumulatively considerable impact on ambient noise levels in the County.

Explanation: Cumulatively considerable impact would occur if project construction noise or construction vibration combined with construction noise and vibration from other cumulative projects in the County to affect the same NSLU. The exact alignment and timing of the future broadband infrastructure is currently unknown. However, there is the potential that some of the locations for future Project components could coincide in location and time with other construction projects resulting in potentially cumulatively considerable impacts. Other cumulative projects in the County would also be subject to CEQA review and would be required to comply with any mitigation measures identified as necessary to reduce potential noise and vibration impacts. Implementation of Mitigation Measures NOI-1 through NOI-3, provided in detail above, would ensure that the project's

[1] Equipment PPV = Reference PPV * $(25/D)^n$ (in/sec), where Reference PPV is PPV at 25 feet, D is distance from equipment to the receiver in feet, and n = 1.1 (the value related to the attenuation rate through the ground); formula from Caltrans 2020.

contribution to combined construction noise and vibration would be less than cumulatively considerable.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measures NOI-1, NOI-2, and NOI-3 which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

7. Transportation

Impact TRA-1: The Project has the potential to conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Explanation: Construction activities may require temporary lane closures, which have the potential to impede or interfere with emergency access routes or services. Coordination with local agencies (e.g., California Highway Patrol [CHP], Caltrans, and local law enforcement and fire departments) for any necessary and temporary road closures would be required, especially for construction within designated emergency access routes or in areas that would impede or otherwise affect evacuation and emergency access or services. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as stipulated in Mitigation Measure TRA-1, provided in detail above. Depending on the location of individual fiber projects, an Encroachment Permit application would be submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3 for review and approval. Any construction on Bureau of Land Management (BLM) land would require the ROW acquisition, and any construction on U.S. Forest Service (USFS) land would require a construction easement. Any construction on private land would require applicable building permits. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along ROW, and would be subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact TRA-3: The Project has the potential to substantially increase hazards due to incompatible uses (e.g., temporary lane closures) during Project construction.

Explanation: Potential road hazards can occur due to a design feature or physical configuration of existing or proposed access roads that can affect the safe movement of

vehicles along a roadway. Future development of the proposed Project would not alter the permanent configuration of roadways within the County and would not introduce types of vehicles that do not already travel on these roads. Construction activities may require temporary lane closures. Coordination with local agencies (e.g., CHP, Caltrans, and local law enforcement and fire departments) for any necessary and temporary road closures would be required. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as outlined in Mitigation Measure TRA-1, provided in detail above. Depending on the location of individual fiber projects, an Encroachment Permit application would be submitted to the applicable local, State, or federal agency for review and approval.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact TRA-4: The Project has the potential to result in inadequate emergency access during Project construction.

Explanation: Construction of individual fiber projects may require temporary lane closures, which have the potential to impede or interfere with emergency access routes or services. Coordination with local agencies (e.g., CHP, Caltrans, and local police and fire departments) for any necessary and temporary road closures would be required, especially for construction along ROW, within designated emergency access routes, or in areas that would impede or otherwise affect evacuation and emergency access or services. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as stipulated in Mitigation Measure TRA-1, provided in detail above. Depending on the location of individual fiber projects, an Encroachment Permit application would be submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3 for review and approval. Any construction on BLM land would require the ROW acquisition, and any construction USFS land would require a construction easement. Any construction on private land would require applicable building permits. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along ROW, subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations

have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact TRA-5: The Project has the potential to contribute to a significant cumulative impact with respect to transportation.

> **Explanation:** Cumulative impacts would occur when the proposed Project, in combination with other projects or plans/projections in El Dorado County, would directly or indirectly have a substantial adverse effect on transportation, VMT, and circulation. As discussed above under Impact TRA-1 through TRA-4, implementation of the proposed Project would result in a less than significant impact related to transportation with implementation of Mitigation Measure TRA-1. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as stipulated in Mitigation Measure TRA-1, provided in detail above. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required to be employed for all construction activities along ROW, and would be subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits. Individual fiber projects would not involve operational trips other than occasional routine maintenance of the fiber optic cables. Operation of the proposed Project would introduce a wider and more reliable network that would benefit communications to emergency services. The Project would improve public health and safety through enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies.
>
> **Significance with Mitigation:** Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

8. Tribal Cultural Resources

Impact TCR-1: The 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: 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).

> **Explanation:** The County acknowledges that tribal cultural resources (TCRs) may be present within the Project area and proposed individual fiber projects could cause a significant impact to such undocumented TCRs. Therefore, implementation of Mitigation Measure TCR-1 would address unanticipated discoveries of TCRs, and the proposed Project's potential impacts to unknown TCRs would be less than significant. The reduction of impact severity would be accomplished through the project-specific implementation of the procedural and substantive requirements of the regulations that govern AB 52

consultation; this will be done through the early identification of potential TCR impact scenarios and the collaborative consultative efforts to develop feasible measures to avoid or minimize such impacts. The following mitigation measure is adopted to reduce potentially significant impacts:

> **Mitigation Measure TCR-1: Tribal Consultation.** When an application for an individual fiber project is deemed complete by El Dorado County, the County, as CEQA Lead Agency, shall conduct the appropriate tribal consultation outreach to relevant California Native American tribes, pursuant to PRC Section 21080.3.1, for all individual fiber projects included within the scope of the El Dorado County Broadband Fiber Project Program EIR prior to project approval. Pursuant to PRC Section 21080.3.1 (b), the tribes will have 30 days for Assembly Bill 52 (AB 52) from the receipt of the request for consultation to either request or decline consultation, in writing, with the County for each proposed individual fiber project. 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 Section 65352.3.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TCR-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact TCR-2: The Project has the potential to 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.

> **Explanation:** The County acknowledges that TCRs may be present within the Project area and proposed individual fiber projects could cause a significant impact to TCRs within the County. Therefore, implementation of Mitigation Measure TCR-1, provided in detail above, would address an adverse change in the significance of TCRs, and the proposed Project's potential impacts to unknown TCRs would be less than significant.

> **Significance with Mitigation:** Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TCR-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact TCR-3: The project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource inadvertently discovered during construction.

Explanation: The County acknowledges that discoveries of an archaeological nature made during individual fiber project construction may qualify as TCRs, which could result in a significant impact to unknown TCRs within the County. Therefore, implementation of Mitigation Measure TCR-2 would address unanticipated discoveries of TCRs, and the Project's potential impacts to unknown TCRs would be less than significant. The reduction of impact severity would be accomplished through the project-specific implementation of the procedural and substantive requirements of the regulations that govern AB 52 consultation, and, where appropriate and with the assent of responding tribes, the application of documentation and/or data recovery efforts to obtain scientifically consequential information in a manner respectful of tribal sovereignty. This will offset the disturbance of the potential TCR in a manner that responds to the basis for its significance as informed by tribal input, information, and expertise. The following mitigation measure is adopted to reduce potentially significant impacts:

Mitigation Measure TCR-2: Tribal Treatment and Tribal Consultation. In the event that potential tribal cultural resources (TCRs) are exposed during ground-disturbing activities, construction activities (e.g., grading, grubbing, or vegetation clearing) shall be halted in the immediate vicinity of the discovery. The consulting tribe that is culturally and geographically affiliated with the area shall then be retained to evaluate if the resource is a Tribal Cultural Resource, and thus significance under CEQA. If the discovery is a Tribal Cultural Resource, additional work and mitigation measures shall be required, such as those listed in PRC §21084.3, as deemed appropriate by the tribal organization consulting on the find. Such mitigation may include avoidance and preservation in place as the preferred alternative.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TCR-2, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact TCR-4: The Project has the potential to contribute to a significant cumulative impact with respect to tribal cultural resources.

Explanation: Cumulative TCR impacts may occur when a series of actions leads to the loss of historically or archaeologically significant types of sites, buildings, deposits, or TCRs. For example, while the loss of a single historic building may not be significant to the character of a neighborhood or streetscape, continued loss of such historic resources on a project-by-project basis could amount to a significant cumulative effect. Mitigation measures conducted for each cumulative individual fiber project would ensure that impacts on TCRs are minimized to the maximum extent feasible. Therefore, with implementation of Mitigation Measures TCR-1 and TCR-2, provided in detail above, and the requirement for the other cumulative projects subject to CEQA to conduct tribal consultation, no cumulatively considerable impact on TCRs would occur with approval of the proposed Project.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TCR-1 and TCR-2, which have been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that these mitigation measures be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

9. Wildfire

Impact FIRE-1: The Project has the potential to impair an adopted emergency response plan or emergency evacuation plan.

Explanation: Construction of individual fiber projects may require temporary lane closures, which have the potential to impede or interfere with emergency access routes or services. Coordination with local agencies (e.g., CHP, Caltrans, and local police and fire departments) for any necessary and temporary road closures would be required, especially for construction within designated emergency access routes or in areas that would impede or otherwise affect evacuation and emergency access or services. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as stipulated in Mitigation Measure TRA-1 below. Depending on the location of individual fiber projects, an Encroachment Permit application would be submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3 for review and approval. Any construction on BLM land would require the ROW acquisition, and any construction on USFS land would require a construction easement. Any construction on private land would require applicable building permits. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along ROW, and would be subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits. With implementation of Mitigation Measure TRA-1, which is provided in detail above and requires preparation of a Traffic Control and Detour Plan, potentially significant impacts related to emergency response or emergency evacuation plans from construction of individual fiber projects along ROW would be reduced to less than significant.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

Impact FIRE-5: The Project would be located in a State Responsibility Area and has the potential to contribute to a significant cumulative impact with respect to wildfire.

Explanation: To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project would be required to develop and implement a Traffic Control and Detour Plan consistent with an Encroachment Permit and code requirements of El Dorado County. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required to be employed for all construction activities along ROW, and would be subject to review and approval by the applicable local, State, or federal agencies for work within their respective limits. With implementation of Mitigation Measure TRA-1, provided in detail above, which requires preparation of a Traffic Control and Detour Plan, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan.

Implementation of the proposed Project and the cumulative projects could potentially involve construction in areas that are prone to wildland fires which could result in significant loss, damage, or death. Adherence to the California Building Code (CBC) Chapter 7A, *Fire Hazard Severity Zones and Building Standards and Materials*, and PRC 4291, requiring property owners to maintain clearance of flammable vegetation of 100 feet from structures, would also reduce the risk of fire. The County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) and City of South Lake Tahoe Local Hazard Mitigation Plan (LHMP) also identify critical facilities and infrastructure that include emergency operations centers and evacuation shelters. These critical facilities would provide emergency support to residents during potential wildfire events. Additionally, fiber optic lines do not carry an electrical charge and are therefore not a source of heat that could exacerbate fire risk. The proposed Project and the cumulative projects would follow the County MJHMP, and City of South Lake Tahoe LHMP, and would adhere to CBC requirements.

Significance with Mitigation: Less Than Significant Impact.

Finding: Implementation of Mitigation Measure TRA-1, which has been required or incorporated into the Project, will reduce this impact to a less than significant level. The Board hereby directs that this mitigation measure be adopted. The Board therefore finds that changes or alterations have been required in, or incorporated into, the Project that avoid the significant environmental effect as identified in the Final PEIR.

B. Findings for Significant and Unavoidable Impacts

The Draft PEIR and Final PEIR identified no significant and unavoidable impacts.

IX. PROJECT ALTERNATIVES

A. Basis for Alternatives-Feasibility Analysis

PRC Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The same statute states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.”

Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a project as proposed will still cause one or more significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. Although an EIR must evaluate this range of *potentially* feasible alternatives, an alternative may ultimately be deemed by the lead agency to be "infeasible" if it fails to fully promote the lead agency's underlying goals and objectives with respect to the project (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 999-1000 (*CNPS*); *Citizens for Open Government v. City of Lodi* (2012) 205 Cal.App.4th 296, 314-315; *City of Del Mar v. City of San Diego* (1983) 133 Cal.App.3d 401, 417). "'Feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors" (*Ibid*.; see also *CNPS*, *supra*, 177 Cal.App.4th at p. 1001). Thus, even if a project alternative will avoid or substantially lessen any of the significant environmental effects of the project, the decision-makers may reject the alternative if they determine that specific considerations make the alternative infeasible.

Under CEQA Guidelines Section 15126.6, the alternatives to be discussed in detail in an EIR should be able to "feasibly attain most of the basic objectives of the project". For this reason, the Project objectives described above provided the framework for defining possible Project alternatives (See *In re Bay-Delta* (2008) 43 Cal.4th 1143, 1166). Alternatives also were evaluated based on general feasibility criteria suggested by the CEQA Guidelines.

Based on the requirements of CEQA Guidelines Section 15126.6 and the Project's Objectives, the following alternatives to the Project were identified:

Alternative 1: No Project Alternative

Alternative 2: Aerial Installation Only

Alternative 3: Underground Installation Only

Alternative 4: Use of Existing Infrastructure

The Board finds that a good-faith effort was made in the Draft PEIR to evaluate a reasonable range of alternatives that could feasibly attain most of the basic objectives of the Project but that would avoid or substantially lessen any of the significant effects of the Project, even when the alternatives might impede the attainment of the Project objectives and might be more costly. As a result, the scope of alternatives analyzed in the Draft PEIR is not unduly limited or narrow (See Chapter 5.0, Project Alternatives, of the Draft PEIR).

1. Significant Unavoidable Impacts of the Project

The DEIR and FEIR identified no significant and unavoidable impacts.

2. Scope of Necessary Findings and Considerations for Project Alternatives

As noted above, these Findings address whether the various alternatives substantially lessen or avoid any of the significant impacts associated with the project and then consider the feasibility of each alternative. Under CEQA, as noted earlier, "[f]easible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account

economic, environmental, legal, social, and technological factors" (CEQA Guidelines, Section 15364). The concept of feasibility permits agency decisionmakers to consider the extent to which an alternative is able to meet some or all of a project's objectives. In addition, the definition of feasibility encompasses "desirability" to the extent that an agency's determination of infeasibility represents a reasonable balancing of competing economic, environmental, social and technological factors supported by substantial evidence.

These Findings consider the extent to which the alternatives are able to meet the Project objectives, as described in the PEIR and in Section III.B, above.

B. Alternatives Considered but Dismissed from Further Evaluation

Not applicable. All alternatives considered were further evaluated.

C. Alternatives Analyzed in the EIR

The PEIR identified and compared environmental effects of the four alternatives listed below with the environmental impacts resulting from the project. The PEIR evaluated the following alternatives to the project:

Alternative 1: No Project Alternative

The No Project 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 in El Dorado County and the service area would remain unchanged from current conditions. As such, the No Project Alternative would not meet the Project Objectives. However, as required by CEQA, the No Project Alternative is evaluated in the Draft PEIR. Under the No Project Alternative, there would be no discretionary action by El Dorado County, and thus no impact. However, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as "impacts" that are greater, similar, or reduced, to describe conditions that are worse than, similar to, or better than those of the proposed Project.

1. Potential Impacts of the No Project Alternative in Comparison to the Project

Aesthetics

Under the No Project Alternative, no construction would occur, and no new broadband infrastructure would be installed. Because there would be no visible changes in the service area, there would be no effects on scenic vistas, no damage to scenic resources adjacent to a designated State Scenic Highway, no degradation of scenic character or views, and no conflict with scenic or visual resource regulations. There would be no impact on aesthetics. (No Impact)

Agriculture and Forestry

Under the No Project Alternative, no construction, excavation, or ground disturbance would occur. Because no changes would occur, the No Project Alternative would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural

uses, nor would it conflict with existing zoning for agricultural use or conflict with a Williamson Act contract. The No Project Alternative would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production, nor would it result in the loss of forest land or conservation of forest land to non-forest use. Lastly, the No Project Alternative would not cause other changes in the existing environment that, due to their location or nature, would result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. For these reasons, the No Project Alternative would have no impact on agricultural and forestry resources. (*No Impact*)

Air Quality

Under the No Project Alternative, the proposed broadband infrastructure would not be constructed. Because no construction would occur and the service area would remain unchanged, there would be no effects on air quality. The No Project Alternative would not conflict with applicable air quality plans, would not increase any criteria pollutant for which the project region is non-attainment, would not expose sensitive receptors to substantial pollutant concentrations, and would not result in substantial emissions of odors adversely affecting a substantial number of people. For these reasons, the No Project Alternative would have no impact on air quality. (*No Impact*)

Biological Resources

Because no construction, excavation, or ground disturbance would occur under the No Project Alternative, there would be no effects on biological resources. The No Project Alternative would not affect special-status species or habitat, or riparian habitat or other sensitive natural communities. Nor would it degrade wetlands, interfere with wildlife movement corridors or nursery sites, or conflict with local ordinances or policies. For these reasons, the No Project Alternative would have no impact on biological resources. (*No Impact*)

Cultural Resources

No construction, excavation, or ground disturbance would occur under the No Project Alternative. Therefore, there would be no effects on historic resources, unique archeological resources, or tribal cultural resources. Because no construction would occur under the No Project Alternative, there would also be no risk of disturbing human remains. For these reasons, the No Project Alternative would have no impact on archeological and historical resources. (*No Impact*)

Energy

The No Project Alternative would not affect energy because it would not result in the construction or operation of new broadband infrastructure. The No Project Alternative would not result in impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation, nor would it conflict or obstruct a State or local plan for renewable energy or energy efficiency. For these reasons, the No Project Alternative would have no impact on energy. (*No Impact*)

Geology and Soils

With the No Project Alternative, no construction, excavation, or ground disturbance would occur. Because no changes would occur, the No Project Alternative would not expose people or

structures to adverse seismic impacts, result in substantial erosion or loss of topsoil, or expose infrastructure to or cause geologic hazards. Similarly, this alternative would not result in the loss of a unique paleontological resource or geologic feature. For these reasons, the No Project Alternative would have no impact on geology and soils. (*No Impact*)

Greenhouse Gases Emissions

Under the No Project Alternative, no construction or operation of additional broadband infrastructure would occur. As a result, there would be no construction related greenhouse gas (GHG) emissions, and no GHG emissions would occur from operating new broadband infrastructure. Thus, there would be no impact on greenhouse gas emissions and climate change. (*No Impact*)

Hazards and Hazardous Materials

No construction would occur, and no new broadband infrastructure would be installed under the No Project Alternative. Because there would be no construction or operation of new broadband infrastructure, there would be no risk of exposure to hazards from the routine transport, use, or disposal of hazardous materials. Similarly, there would be no risk of upset or accident conditions or development on a hazardous waste site, and no risk of emitting or handling hazardous materials near a school. The No Project Alternative would also not result in hazards due to construction near an airport, conflict with an emergency response or evacuation plan, or increase wildfire risk or exposure to wildfire. For these reasons, there would be no impact associated with hazards and hazardous materials. (*No Impact*)

Hydrology and Water Quality

Because no construction, excavation, or ground disturbance would occur under the No Project Alternative, the alternative would not affect hydrology and water quality. With no construction activities or new infrastructure, the No Project Alternative would not violate any water quality standards or degrade surface or groundwater quality, nor would it affect groundwater supply or result in substantial erosion, flooding, or runoff. The No Project Alternative would also not change the existing risk of the release of pollutants due to inundation for seiche or flood. Therefore, the No Project Alternative would have no impact on hydrology and water quality. (*No Impact*)

Land Use and Planning

The No Project Alternative would not affect land use and planning because it would not result in the construction or operation of new broadband infrastructure. The No Project Alternative would not physically divide an established community, nor would it cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. For these reasons, the No Project Alternative would have no impact on land use and planning. (*No Impact*)

Mineral Resources

With the No Project Alternative, no construction, excavation, or ground disturbance would occur. Because no changes would occur, the No Project Alternative would not 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 or result in the loss of availability of a locally important mineral resource recovery site. Therefore, the No Project Alternative would have no impact on mineral resources. (*No Impact*)

Noise

Under the No Project Alternative, no construction or operation of additional broadband infrastructure would occur. As a result, there would be no construction or operational noise. Thus, there would be no impact related to noise. (*No Impact*)

Population and Housing

The No Project Alternative would not affect population and housing because it would not result in the construction or operation of new broadband infrastructure that would induce unplanned population growth either directly or indirectly. Further, the No Project Alternative would not displace existing people or housing, necessitating the construction of replacement housing elsewhere. For these reasons, the No Project Alternative would have no impact on population and housing. (*No Impact*)

Public Services

The No Project Alternative would not affect public services because it would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives for any public services including fire protection, police protection, schools, parks, or other public facilities. Therefore, the No Project Alternative would have no impact on public service. (*No Impact*)

Recreation

The No Project Alternative would not affect recreation because it would not 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. Further, the No Project Alternative would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. For these reasons, the No Project Alternative would have no impact on recreation. (*No Impact*)

Transportation

The No Project Alternative would not impact transportation because it would not result in the construction or operation of new broadband infrastructure. Because there would be no construction activity or new infrastructure, the alternative would not conflict with plans, ordinances, or policies addressing the circulation system; nor would it affect vehicle miles travelled. Similarly, the No Project Alternative would not substantially increase transportation hazards or result in inadequate emergency access. For these reasons, there would be no impact on transportation and traffic. (*No Impact*)

Tribal Cultural Resources

No construction, excavation, or ground disturbance would occur under the No Project Alternative. Therefore, there would be no effects on historic resources, unique archeological resources, or

tribal cultural resources. Because no construction would occur under the No Project Alternative, there would also be no risk of disturbing human remains. For these reasons, the No Project Alternative would have no impact on tribal cultural resources. (*No Impact*)

Utilities and Service Systems

The No Project Alternative would not affect utilities and service systems because it would not result in the construction or operation of new broadband infrastructure. There would be no increase to the limited existing broadband within the County. With no new infrastructure, the No Project Alternative would not impact water supplies available and wastewater treatment capacity and would not generate solid waste access that would impact solid waste reduction goals. For these reasons, there would be no impact on utilities. (*No Impact*)

Wildfire

The No Project Alternative would not affect wildfires as no construction or operation of additional broadband infrastructure would occur. With no new infrastructure, there would be no impact on an adopted emergency response plan or emergency evacuation plan. Additionally, wildfire risks would not be exacerbated, and people or structures would not be exposed to risks as a result of runoff, post-fire slope instability, or drainage changes. For these reasons, there would be no impact on wildfire. (*No Impact*)

2. Feasibility and Relationship to Project Objectives

The No Project Alternative would result in fewer impacts to aesthetics, agriculture and forestry, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire when compared to the proposed project. Following is a discussion of the No Project Alternative's ability to attain the Project Objectives:

- ***Promote the construction of a broadband network in unincorporated and incorporated areas of El Dorado County;***

The No Project Alternative would not install any broadband infrastructure within the County and the existing conditions would remain as is. The No Project Alternative would not achieve this objective.

- ***Enable an increase in telework and telecommuting, with a correlated decrease in vehicle miles traveled;***

The No Project Alternative would not install any broadband infrastructure within the County and the existing conditions would remain as is. The No Project Alternative would not achieve this objective.

- ***Improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies;***

The No Project Alternative would not install any broadband infrastructure within the County and the existing conditions would remain as is. The No Project Alternative would not achieve this objective.

- ***Streamline the environmental review process for individual fiber projects that are implemented in the County;***

The No Project Alternative would not install any broadband infrastructure within the County and the existing conditions would remain as is. The No Project Alternative would not achieve this objective.

- ***Identify known environmental and cultural assets to be protected and/or restored with an approved set of preservation measures and/or mitigations; and,***

The No Project Alternative would not install any broadband infrastructure within the County and the existing conditions would remain as is. The No Project Alternative would not achieve this objective.

- ***Save time and money for both El Dorado County and broadband project applicants, resulting in greater government and economic efficiencies, reducing the amount of County staff time required to review broadband projects and avoiding duplication of applicant costs.***

The No Project Alternative would not install any broadband infrastructure within the County and the existing conditions would remain as is. The No Project Alternative would not achieve this objective.

Alternative 2: Aerial Installation Only Alternative

The Aerial Installation Only Alternative would include only individual fiber projects that install aboveground fiber optic line that would utilize new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. This alternative was considered because it would avoid or reduce potential impacts that would be associated with underground installation of new fiber optic line or new conduit, such as construction impacts associated with horizontal directional drilling, plowing, trenching, micro trenching, line installation, and pavement repair. Some areas of the County are known to contain NOA and aerially deposited lead (ADL); the minimized ground disturbance under aerial installation methods would reduce the potential risk of exposure to hazardous materials. The aerial installation of fiber optic line would also be more feasible for long distance connections, such as in rural areas of the County.

However, the addition of new utility poles may not be feasible in some locations in the County due to the existing terrain and rocky subsurface conditions that would make it nearly impossible to reach the boring depth required for utility poles, which would leave service gaps in those locations. Further, aerial installation may not be feasible in some densely forested and mountainous areas of the County, which may prevent the aerial stringing of fiber optic line or the installation of new utility poles. Aerial fiber optic line also typically requires more frequent maintenance, as compared to underground fiber optic line or conduit. Additionally, this alternative may result in increased impacts to aesthetics and visual resources associated with the construction of new utility poles within the viewshed of scenic vistas or U.S. 50, State Route (SR) 89, and SR 88, portions of which are designated State Scenic Highways within the County.

1. Potential Impacts of the Aerial Installation Only Alternative in Comparison to the Project

Aesthetics

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Aesthetic impacts related to construction under this alternative would be similar to the proposed Project, as all construction activities would be temporary and short-term. Similar to the proposed Project, any lighting during construction would be minimal and downward facing to prevent light spillover and glare. However, this alternative may result in increased impacts to aesthetics and visual resources associated with the construction of new utility poles within the viewshed of scenic vistas or U.S. 50, SR 89, and SR 88, portions of which are designated State Scenic Highways within the County, as compared to the proposed Project. Under the proposed Project, individual fiber projects could install underground broadband infrastructure, which would avoid impacts to aesthetics. Similar to the proposed Project, Mitigation Measure AES-1 would be required to be implemented under this alternative to reduce potential impacts to scenic resources. The Aerial Installation Only Alternative would result in slightly greater impacts as compared to the proposed Project. (*Greater Impact*)

Agriculture and Forestry Resources

Under the Aerial Installation Only alternative, individual fiber projects would only install aboveground fiberoptic line on new or existing constructed utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, this alternative would be primarily located within previously disturbed and/or developed areas, and as such, would not convert or conflict with agriculture or forestry resources.

Section 4.2, Agriculture and Forestry Resources, of EIR concluded that the proposed Project would result in a less than significant impact to agriculture and forestry resources. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Air Quality

Under the Aerial Installation Only Alternative, construction activities would mainly include aerial stringing of fiber optic line and the installation of new utility poles. This alternative would require reduced ground disturbance and would avoid construction activities such as horizontal directional drilling, plowing, trenching, micro trenching, and pavement repair. Section 4.3, Air Quality, of the Draft PEIR, concluded that the proposed Project would result in a less than significant construction impact would implementation of Mitigation Measures AQ-1 and AQ-2. Additionally, some areas of the County are known to contain NOA and ADL; the reduced ground disturbance impacts associated with the Aerial Installation Only Alternative would result in reduced air quality impacts associated with exposure to pollutant concentrations. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. A backup generator may be used in the event of a power outage or for routine testing. Similar to the proposed Project, Mitigation Measures AQ-1 and AQ-2 would be required to be implemented under this alternative to reduce potential impacts to reduce potential impacts from fugitive dust and asbestos dust.

Section 4.3, Air Quality, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure AQ-1 and AQ-2. The Aerial Installation Only Alternative would result in slightly reduced impacts on air quality as compared to the proposed Project. (*Reduced Impact*)

Biological Resources

Under the Aerial Installation Only alternative, individual fiber projects would only install aboveground fiberoptic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, individual fiber projects would be required to prepare a BRA, as outlined in Mitigation Measure BIO-1 to reduce impacts to a less than significant level. If it is determined in the BRA that there is the potential for impacts to special-status species, recommended mitigation and/or avoidance measures detailed in Mitigation Measures BIO-2 through BIO-8 shall be included in the project-specific BRA as required by Mitigation Measure BIO-1. With implementation of Mitigation Measure BIO-9, potential impacts to jurisdictional waters, wetlands, and/or sensitive natural communities that may occur within the Project area would be reduced to less than significant. With the implementation of Mitigation Measure BIO-10, potential impacts to oak resources that may occur within the Project area would be reduced to less than significant.

Section 4.4, Biological Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures BIO-1 through BIO-10. The Aerial Installation Only Alternative would result in similar impacts on biological resources as compared to the proposed Project. (*Similar Impact*)

Cultural Resources

Under the Aerial Installation Only alternative, individual fiber projects would only install aboveground fiberoptic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Installation of new utility poles under this alternative would introduce a new visual element to areas with concentrations of historical built environment cultural resources such as buildings and structures that comprise historic districts. The use of new or existing utility poles for the collocation of fiber optic cable would change the visual signature of the poles and their vicinity. However, these collocations and new installations would be relatively minor additions to existing utility corridors in the County already populated with other utility infrastructure, including in and near historic districts and historical resources. The installation of these fiber optic lines, as proposed, would not diminish a built-environment resource's ability to convey its significance or justify the reasons for its qualification as a historical resource, two of the criteria of material impairment in the definition of a substantial adverse change in the significance of a historical resource. However, similar to the proposed Project, individual fiber projects under this alternative could impede or destroy archaeological cultural resource's ability to convey their significance, which can embody scientific and/or traditional cultural value. Similar to the proposed Project, Mitigation Measure CUL-1 and CUL-2 would be required to be implemented under this alternative to mitigate or avoid archaeological cultural resource impact scenarios.

Section 4.4, Cultural Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures CUL-1 and

CUL-2. The Aerial Installation Only Alternative would result in similar, impacts as compared to the proposed Project. (*Similar Impact*)

Energy

Under the Aerial Installation Only Alternative, construction activities would mainly include aerial stringing of fiber optic line and the installation of new utility poles. This alternative would require less ground disturbance and would avoid construction activities such as horizontal directional drilling, plowing, trenching, micro trenching, and pavement repair, which would result in a slightly reduced impact to energy associated with construction as compared to the proposed Project. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. Further, operation of fiber optic lines themselves would not utilize energy; rather, the fiber optic lines transfer data. Similar to the proposed Project, this alternative would not conflict with or obstruct a State or local plan for renewable energy efficiency.

Section 4.6, Energy, of the Draft PEIR, concluded that the proposed Project would result in a less than significant impact on energy efficiency. The Aerial Installation Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Geology and Soils

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative, which would reduce the amount of ground disturbance as compared to the proposed Project. This alternative would reduce potential soil erosion impacts that would be associated with underground installation of new fiber optic line or new conduit, such as impacts associated with horizontal directional drilling, plowing, trenching, micro trenching, line installation, and pavement repair. As compared to the proposed Project, this alternative would have similar risks of exposing people or structures to landslides, lateral spreading, subsidence, liquefaction, soil erosion, or seismic impacts as construction would occur within County limits. However, this alternative may not be feasible in some locations in the County due to prevailing terrain and rocky subsurface conditions that would make it nearly impossible to reach the boring depth required for utility poles.

Section 4.7, Geology and Soils, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact on geology and soils. The Aerial Installation Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Greenhouse Gas Emissions

Under the Aerial Installation Only Alternative, construction activities would mainly include line installation and aerial stringing. Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, concluded that the proposed Project would result in a less than significant impact to GHGs associated with construction. This alternative would require less ground disturbance activities and would avoid construction activities such as horizontal directional drilling, plowing, trenching, micro trenching, and pavement repair, therefore requiring less construction equipment and less GHGs associated with construction. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. GHG emissions are addressed within the El Dorado County General Plan, City of South

Lake Tahoe General Plan, and the Tahoe Regional Planning Agency (TRPA) Regional Plan. Similar to the proposed Project, this alternative would be consistent with the El Dorado County General Plan, City of South Lake Tahoe General Plan, and the TRPA Regional Plan.

Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to GHG emissions. The Aerial Installation Only Alternative would result in slightly reduced GHG impacts as compared to the proposed Project. (*Reduced Impact*)

Hazards and Hazardous Materials

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. Similar to the proposed Project, small quantities of hazardous materials may be stored, used, and handled during construction activities or during routine maintenance checks, and may be located within one quarter mile of a school. Underground construction under this alternative would be limited to the installation of utility poles, this alternative would avoid impacts associated with the spillage of drilling fluid. However, this alternative would still be required to implement and comply with existing hazardous material regulations. Some areas of the County are known to contain NOA and ADL; the reduced ground disturbance associated with aerial installation methods would reduce the potential risk of exposure to hazardous materials. Additionally, as with the proposed Project, this alternative would not include utility poles over 100 feet in height or include permanent structures for human occupancy; therefore, this alternative would not interfere with airport operations or expose residents to airport-related noise. Fire risks associated with construction and operation under this alternative would require adherence to CBC Chapter 7A and Public Resources Code 4291, similar to the proposed Project; however, fiber optic lines themselves do not carry an electrical charge and would therefore not exacerbate wildland fire risk. Similar to the proposed Project, Mitigation Measure AQ-2 would be required to be implemented under this alternative to reduce potential impacts from asbestos dust and Mitigation Measure TRA-1 would be required to be implemented to manage traffic during construction.

Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures AQ-2 and TRA-1. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Hydrology and Water Quality

The Aerial Installation Only Alternative would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, if this alternative would disturb more than one acre of soil, a Stormwater Pollution Prevention Plan (SWPPP) with project-specific BMPs would be required for each individual fiber project. As with the proposed Project, this alternative could involve minor use of water for dust control during construction. Operation under this alternative would require occasional maintenance needs, similar to the proposed Project; however, it is not anticipated this alternative would require additional water supplies during operation as no population would be generated.

Section 4.10, Hydrology and Water, of the Draft PEIR concluded that the proposed Project would result in less than significant impacts to hydrology and water quality. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Land Use and Planning

The Aerial Installation Only Alternative would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. As with the proposed Project, the installation of broadband infrastructure this alternative would not interfere with the continuation of existing aboveground uses after construction is completed and would not physically divide an established community. Prior to issuance of all applicable permits, individual fiber projects under this alternative would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances, similar to the proposed Project. Additionally, as with the proposed Project, this alternative would not conflict with any land use plan, policy, or regulation. Under this alternative, individual fiber projects would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources, similar to the proposed Project.

Section 4.11, Land Use and Planning, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to land use and planning. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Mineral Resources

The Aerial Installation Only Alternative would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. This alternative would utilize new or existing utility poles located within previously disturbed and/or developed areas; as such, this alternative would not interfere with the existing mines or mineral land classification studies in El Dorado County, similar to the proposed Project.

Section 4.12, Mineral Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to mineral resources. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Noise

The Aerial Installation Only Alternative would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, construction under this alternative would be required to limit construction hours and implement construction noise BMPs, as outlined under Mitigation Measure NOI 1. Similar to the proposed Project, the Aerial Installation Only Alternative would require emergency backup generators to be located more than 60 feet from a Noise Sensitive Land Use (NSLU) in a community area or 105 feet of a NSLU in a rural area or provide sound reduction measures to reduce noise from generators to less than 55 dBA measured at affected NSLUs, as outlined in Mitigation Measure NOI-2. Additionally, similar to the proposed Project, if construction under this alternative would use a vibratory roller, Mitigation Measure NOI-3 would require vibratory rollers to be used in static mode only (no vibrations) in proximity to occupied buildings or fragile structures. Similar to the proposed Project, this alternative would not expose people residing or working in the Project area to excessive noise levels from public use or private airstrips.

Section 4.13, Noise, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures NOI-1 through NOI-3. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Population and Housing

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, this alternative would not directly induce population growth, as the Project would not create a substantial number of jobs, promote the construction of jobs, or remove any obstacles that currently impede growth in the County. Additionally, similar to the proposed Project, this alternative would not displace people or housing, or require the construction of replacement housing.

Section 4.14, Population and Housing, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to population and housing. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Public Services

The Aerial Installation Only Alternative would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, this alternative would not require the construction of housing and would not contribute to substantial unplanned population growth. Therefore, the proposed Project would not generate any additional residential population that would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives for any public services including fire protection, police protection, schools, parks, or other public facilities. However, this alternative 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 utility poles. As such, operation under this alternative would not introduce a wider or more reliable network that would improve public health and safety through enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies. Therefore, impacts under this alternative related to police and fire protection would be slightly greater as compared to the proposed Project.

Section 4.15, Public Services, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to fire protection, police protection, and other public facilities, and no impact to schools and parks. The Aerial Installation Only Alternative would result in slightly greater impacts to fire protection and police protection as compared to the proposed Project, and similar impacts to schools, parks, and other public facilities. (*Greater Impact*)

Recreation

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or

new conduit would be installed under this alternative. Similar to the proposed Project, implementation of this alternative would not require the construction of housing and, therefore, would not contribute to substantial unplanned population growth. As such, the proposed Project would not generate an increased use of neighborhood or regional parks or other recreational facilities. Additionally, implementation of both the proposed Project and this alternative would not include or require the construction or expansion of recreational facilities.

Section 4.16, Recreation, of the Draft PEIR concluded that the proposed Project would result in no impact to recreation. Similar to the proposed Project, no impact would occur under the Aerial Installation Only Alternative. (*Similar Impact*)

Transportation

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, each individual fiber project that would require the issuance of an encroachment permit would be required to develop and implement a Traffic Control and Detour Plan as stipulated in Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County. Depending on the location of individual fiber projects, an Encroachment Permit application would be submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3. Any construction on BLM land would require the ROW acquisition, and any construction on USFS land would require a construction easement. Any construction on private land would require applicable building permits. Similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, as required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County.

Section 4.17, Transportation, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure TRA-1. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Tribal Cultural Resources

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, under this alternative, Mitigation Measures TCR-1 and TCR-2 would be required to be implemented to address the unanticipated discoveries of TCRs through Assembly Bill (AB) 52 consultation procedures.

Section 4.18, Tribal Cultural Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure TCR-1 and TCR-2. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Utilities and Service Systems

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. No underground fiber optic line or new conduit would be installed under this alternative. Similar to the proposed Project, new aboveground telecommunication facilities would be installed; however, the Draft PEIR analyzes all potential environmental impacts regarding installation of broadband infrastructure. Additionally, similar to the proposed Project, this alternative would not require relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or natural gas facilities. As with the proposed Project, this alternative could involve minor use of water for dust control during construction; however, it is not anticipated this alternative would require additional water supplies during operation as no population would be generated. Additionally, during construction, it is anticipated that portable toilets could be provided for workers, and waste would be hauled to an approved facility for treatment/ disposal. As wastewater associated with portable toilets would be a temporary demand, this alternative, would not exceed wastewater treatment requirements of the Central Valley Regional Water Quality Control Board (CVRWQCB) or the Lahontan Regional Water Quality Control Board (LRWQCB), similar to the proposed Project. Due to the minimal amount of solid waste generated by individual fiber projects, this alternative would not adversely affect the jurisdictions' abilities to comply with the State waste diversion requirements.

Section 4.19, Utilities and Service Systems, of the Draft PEIR concluded that the proposed Project would result in less than significant impacts to utilities and service systems. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Wildfire

Under the Aerial Installation Only Alternative, individual fiber projects would only install aboveground fiber optic line on new or existing utility poles. Although fiber optic lines do not carry an electrical charge, fire risks associated with construction under this alternative would require adherence to CBC Chapter 7A and Public Resources Code 4291, similar to the proposed Project. Additionally, similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, as required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County.

Section 4.20, Wildfire, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure TRA-1. The Aerial Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

2. Feasibility and Relationship to Project Objectives

The Aerial Installation Only Alternative would result in reduced impacts to air quality, energy, geology and soils, and greenhouse gas emissions; similar impacts to agriculture and forestry resources, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire; and

greater impacts to aesthetics and public services. Following is a discussion of the Aerial Installation Only Alternative's ability to attain the Project Objectives:

- ***Promote the construction of a broadband network in unincorporated and incorporated areas of El Dorado County;***

The Aerial Installation Only alternative would install aboveground fiber optic cables on new or existing utility poles. Under this alternative, the installation of new utility poles may not be feasible in some locations in the County, which would not promote the expansion of broadband network as effectively as the proposed Project. Therefore, the Aerial Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Enable an increase in telework and telecommuting, with a correlated decrease in vehicle miles traveled;***

The Aerial Installation Only alternative would install aboveground fiber optic cables on new or existing utility poles. Under this alternative, the installation of new utility poles may not be feasible in some locations in the County, which would not enable an increase in telework and telecommuting, with a correlated decrease in VMT, as effectively as the proposed Project. Therefore, the Aerial Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies;***

The Aerial Installation Only alternative would install aboveground fiber optic cables on new or existing utility poles. Under this alternative, the installation of new utility poles may not be feasible in some locations in the County, which would not improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies as effectively as the proposed Project. Therefore, the Aerial Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Streamline the environmental review process for individual fiber projects that are implemented in the County;***

The Aerial Installation Only alternative would install aboveground fiber optic cables on new or existing utility poles. However, this alternative would not serve to streamline the environmental review process for individual fiber projects that seek to include new or existing underground fiber optic conduit. Therefore, the Aerial Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Identify known environmental and cultural assets to be protected and/or restored with an approved set of preservation measures and/or mitigations; and,***

The Aerial Installation Only alternative would install aboveground fiber optic cables on new or existing utility poles. The installation of new utility poles may not be feasible in some locations in the County, which would exclude the identification of environmental and cultural assets in those portions of the County under this alternative. Therefore, the Aerial Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Save time and money for both El Dorado County and broadband project applicants, resulting in greater government and economic efficiencies, reducing the amount of County staff time required to review broadband projects and avoiding duplication of applicant costs.***

The Aerial Installation Only alternative would install aboveground fiber optic cables on new or existing utility poles. However, as this alternative would not serve to streamline the environmental review process for individual fiber projects that seek to include underground fiber optic conduit, this alternative would not save time and money for the County and individual broadband project applicants as effectively as the proposed Project. Therefore, the Aerial Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

Alternative 3: Underground Installation Only Alternative

The Underground Installation Only Alternative would include individual fiber projects that would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line or new utility poles would be installed under this alternative. This alternative was considered because it would avoid or reduce potential impacts that would be associated with aboveground installation of fiber optic line, including impacts to aesthetics and visual resources associated with the construction of new utility poles within the viewsheds of scenic vistas or U.S. 50, SR 89, and SR 88, portions of which are designated State Scenic Highways within the County. Additionally, this alternative would be more feasible in certain areas of the County, such as densely forested or mountainous areas that would prevent the aerial stringing of fiber optic line or the installation of new utility poles. Lastly, the underground installation of fiber optic line typically requires less frequent maintenance due to fewer disturbances as compared to aerial fiber optic line.

However, the installation of underground fiber optic lines typically requires more ground disturbance and longer construction periods as compared to aerial installation. Increased construction-related impacts could occur due to the increased ground disturbance required for installation, including horizontal directional drilling, plowing, trenching, micro trenching, and line installation. Under this alternative, underground fiber optic lines could be constructed in areas that have existing buried utilities that could contain hazardous waste. Additionally, some areas of the County are known to contain NOA and ADL; the increased ground disturbance resulting from underground installation methods may increase the risk of exposure to hazardous materials. Depending on the prevailing terrain and geological conditions, including bedrock near the surface, it may not be feasible to install underground infrastructure in some parts of the County.

1. ***Potential Impacts of the Underground Installation Only Alternative in Comparison to the Project***

Aesthetics

Under the Underground Installation Only Alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line or new utility poles would be installed under this alternative. Aesthetic impacts related to construction under this alternative would be similar to the proposed Project, as all construction activities would be temporary and short-term. However, operation under this alternative would avoid impacts to aesthetics and visual resources, as no aboveground fiber optic line or new utility poles would be installed within the viewshed of scenic vistas or U.S. 50, SR 89,

or SR 88, portions of which are designated State Scenic Highways within the County. Therefore, this alternative would result in reduced aesthetic impacts as compared to the proposed Project.

Section 4.1, Aesthetics, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure AES-1. The Underground Installation Only Alternative would result in reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Agriculture and Forestry Resources

Under the Underground Installation Only Alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. Similar to the proposed Project, this alternative would be primarily located within previously disturbed and/or developed areas, and as such, would not convert or conflict with agriculture or forestry resources.

Section 4.2, Agriculture and Forestry Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to agriculture and forestry resources. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Air Quality

Under the Underground Installation Only Alternative, construction activities would mainly include horizontal directional drilling, plowing, trenching, micro trenching, line installation, and pavement repair. Under this alternative, the installation of only underground fiber optic lines would require more ground disturbance, and the construction period would generally be longer as compared to aerial installation methods. Further, some areas of the County are known to contain NOA and ADL; the increased ground disturbance would result in increased air quality impacts associated with exposure to pollutant concentrations. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. A backup generator may be used in the event of a power outage or for routine testing, similar to the proposed Project. Similar to the proposed Project, Mitigation Measures AQ-1 and AQ-2 would be required to be implemented under this alternative to reduce potential impacts to reduce potential impacts from fugitive dust and asbestos dust.

Section 4.3, Air Quality, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures AQ-1 and AQ-2. The Aerial Installation Only Alternative would result in slightly greater impacts as compared to the proposed Project. (*Greater Impact*)

Biological Resources

Under the Underground Installation Only alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. Similar to the proposed Project, individual fiber projects would be required to prepare a BRA, as outlined in Mitigation Measure BIO-1 to reduce impacts to a less than significant level. If it is determined in the BRA that there is the potential for impacts to special-status species, recommended mitigation and/or avoidance measures detailed in Mitigation Measures BIO-2 through BIO-8 shall be included in the project-specific BRA as required by Mitigation Measure BIO-1. With implementation of

Mitigation Measure BIO-9, potential impacts to jurisdictional waters, wetlands, and/or sensitive natural communities that may occur within the Project area would be reduced to less than significant. With the implementation of Mitigation Measure BIO-10, potential impacts to oak resources that may occur within the Project area would be reduced to less than significant.

Section 4.4, Biological Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures BIO-1 through BIO-10. The Underground Installation Only Alternative would result in similar impacts with mitigation as compared to the proposed Project. (*Similar Impact*)

Cultural Resources

Under the Underground Installation Only alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. As this alternative would only install utility poles and would be located underground, operation of individual fiber projects would not introduce a new visual element to areas with concentrations of historical built environment cultural resources such as buildings and structures that comprise historic districts. There would be no change in the visual signature of the vicinity. However, similar to the proposed Project, individual fiber projects under this alternative could impede or destroy archaeological cultural resource's ability to convey their significance, which can embody scientific and/or traditional cultural value. Mitigation Measure CUL-1 and CUL-2 would be required to be implemented under this alternative, same as the proposed Project, to mitigate or avoid archaeological cultural resource impact scenarios.

Section 4.5, Cultural Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures CUL-1 and CUL-2. The Underground Installation Only Alternative would result in similar impacts with mitigation as compared to the proposed Project. (*Similar Impact*)

Energy

Under the Underground Installation Only alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. Under this alternative, the installation of only underground fiber optic lines would require more ground disturbance and increased construction equipment needed for horizontal directional drilling, plowing, trenching, and micro trenching. As such, construction of this alternative would utilize slightly increased energy associated with construction as compared to the proposed Project. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. Further, operation of fiber optic lines themselves would not utilize energy; rather, the fiber optic lines transfer data. Similar to the proposed Project, this alternative would not conflict with or obstruct a State or local plan for renewable energy efficiency.

Section 4.6, Energy, of the Draft PEIR, concluded that the proposed Project would result in a less than significant impact on energy efficiency. The Underground Installation Only Alternative would result in slightly greater impacts as compared to the proposed Project. (*Greater Impact*)

Geology and Soils

Under the Underground Installation Only Alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. This alternative may result in increased soil erosion impacts due to increased ground disturbance required for underground installation, including construction impacts associated with horizontal directional drilling, plowing, trenching, micro trenching, and line installation. However, as compared to the proposed Project, this alternative would have similar risks of exposing people or structures to landslides, lateral spreading, subsidence, liquefaction, soil erosion, or seismic impacts as construction would occur within County limits. Further, construction methods under this alternative, including horizontal directional drilling, plowing, trenching, micro trenching, and line installation 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 underground conduit.

Section 4.7, Geology and Soils, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to geology and soils. The Underground Installation Only Alternative would result in slightly greater impacts as compared to the proposed Project. (*Greater Impact*)

Greenhouse Gas Emissions

Under the Underground Installation Only Alternative, construction activities would mainly include horizontal directional drilling, plowing, trenching, micro trenching, line installation, and pavement repair. This alternative would avoid construction activities such as aerial stringing. Under this alternative, the installation of only underground fiber optic lines would require more ground disturbance and increased construction equipment needed for construction methods such as horizontal directional drilling, plowing, trenching, and micro trenching. As such, this alternative would result in slightly increased impacts to GHGs associated with construction as compared to the proposed Project. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. GHG emissions are addressed within the El Dorado County General Plan, City of South Lake Tahoe General Plan, and the TRPA Regional Plan. Similar to the proposed Project, this alternative would be consistent with the El Dorado County General Plan, City of South Lake Tahoe General Plan, and the TRPA Regional Plan.

Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to GHG emissions. The Underground Installation Only Alternative would result in slightly greater impacts as compared to the proposed Project. (*Greater Impact*)

Hazards and Hazardous Materials

Under the Underground Installation Only Alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. Similar to the proposed Project, small quantities of hazardous materials may be stored, used, and handled during construction activities or during routine maintenance checks, and may be located within one quarter mile of a school. However, this alternative could be susceptible to hazard and hazardous material impacts due to possible digging into existing, unmarked infrastructure. Some areas of the County are known to contain NOA and ADL; the increased ground disturbance resulting from

underground installation methods may increase the risk of exposure to these hazardous materials. This alternative would not include the construction of utility poles or include permanent structures for human occupancy; therefore, this alternative would not interfere with airport operations or expose residents to airport-related noise. Fire risks associated with construction and operation under this alternative would require adherence to CBC Chapter 7A and Public Resources Code 4291, similar to the proposed Project; however, fiber optic lines themselves do not carry an electrical charge and would therefore not exacerbate wildland fire risk. Similar to the proposed Project, Mitigation Measure AQ-2 would be required to be implemented under this alternative to reduce potential impacts from asbestos dust and Mitigation Measure TRA-1 would be required to be implemented to manage traffic during construction.

Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures AQ-2 and TRA-1. The Underground Installation Only Alternative would result in slightly greater impacts as compared to the proposed Project. (*Greater Impact*)

Hydrology and Water Quality

The Underground Installation Only Alternative would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. Similar to the proposed Project, if this alternative would disturb more than one acre of soil, a SWPPP with project-specific BMPs would be required for each individual fiber project. As with the proposed Project, this alternative could involve minor use of water for dust control during construction. Operation under this alternative would require occasional maintenance needs, similar to the proposed Project; however, this alternative would not require additional water supplies during operation as no population would be generated.

Section 4.10, Hydrology and Water Quality, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to hydrology and water quality. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Land Use and Planning

The Underground Installation Only Alternative would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. As with the proposed Project, the installation of broadband infrastructure this alternative would not interfere with the continuation of existing aboveground uses after construction is completed and would not physically divide an established community. Prior to issuance of all applicable permits, individual fiber projects under this alternative would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances, similar to the proposed Project. Additionally, as with the proposed Project, this alternative would not conflict with any land use plan, policy, or regulation. Under this alternative, individual fiber projects would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources, similar to the proposed Project.

Section 4.11, Land Use and Planning, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to land use and planning. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Mineral Resources

The Underground Installation Only Alternative would only install underground fiber optic lines and would utilize new or existing underground conduit. No aboveground fiber optic line would be installed under this alternative. This alternative would utilize new or existing underground conduit located within previously disturbed and/or developed areas; as such, this alternative would not interfere with the existing mines or mineral land classification studies in El Dorado County, similar to the proposed Project.

Section 4.12, Mineral Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to mineral resources. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Noise

The Underground Installation Only Alternative would only 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. Similar to the proposed Project, construction under this alternative would be required to limit construction hours and implement construction noise BMPs, as outlined under Mitigation Measure NOI-1. Similar to the proposed Project, the Underground Installation Only Alternative would require emergency backup generators to be located more than 60 feet from a NSLU in a community area or 105 feet of a NSLU in a rural area or provide sound reduction measures to reduce noise from generators to less than 55 dBA measured at affected NSLUs, as outlined in Mitigation Measure NOI-2. Additionally, similar to the proposed Project, if construction under this alternative would use a vibratory roller, Mitigation Measure NOI-3 would require vibratory rollers to be used in static mode only (no vibrations) in proximity to occupied buildings or fragile structures. Similar to the proposed Project, this alternative would not expose people residing or working in the Project area to excessive noise levels from public use or private airstrips.

Section 4.13, Noise, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures NOI-1 through NOI-3. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Population and Housing

Under the Underground Installation Only Alternative, individual fiber projects would only 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. Similar to the proposed Project, this alternative would not directly induce population growth, as the Project would not create a substantial number of jobs, promote the construction of jobs, or remove any obstacles that currently impede growth in the County. Additionally, similar to the proposed Project, this alternative would not displace people or housing or require the construction of replacement housing.

Section 4.14, Population and Housing, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to population and housing. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Public Services

Under the Underground Installation Only Alternative, individual fiber projects would only 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. Similar to the proposed Project, this alternative would not require the construction of housing and would not contribute to substantial unplanned population growth. Therefore, the proposed Project would not generate any additional residential population that would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives for any public services including fire protection, police protection, schools, parks, or other public facilities. However, construction methods under this alternative, including horizontal directional drilling, plowing, trenching, micro trenching, and line installation 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 underground conduit. As such, operation under this alternative would not introduce a wider or more reliable network that would improve public health and safety through enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies. Therefore, impacts under this alternative related to police and fire protection would be slightly greater as compared to the proposed Project.

Section 4.15, Public Services, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to fire protection, police protection, schools, and other public facilities, and no impact to parks. The Underground Installation Only Alternative would result in slightly greater impacts to fire protection and police protection as compared to the proposed Project, and similar impact to schools, parks, or other public facilities. (*Greater Impact*)

Recreation

Under the Underground Installation Only Alternative, individual fiber projects would only 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. Similar to the proposed Project, implementation of this alternative would not require the construction of housing and, therefore, would not contribute to substantial unplanned population growth. As such, the proposed Project would not generate an increased use of neighborhood or regional parks or other recreational facilities. Additionally, implementation of both the proposed Project and this alternative would not include or require the construction or expansion of recreational facilities.

Section 4.16, Recreation, of the Draft PEIR concluded that the proposed Project would result in no impact to recreation. Similar to the proposed Project, no impact would occur under the Underground Installation Only Alternative. (*Similar Impact*)

Transportation

Under the Underground Installation Only Alternative, individual fiber projects would only 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. Similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, as required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County. Depending on the location of individual fiber projects, an Encroachment Permit application would be required to be

submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3 for review and approval. Any construction on BLM land would require the ROW acquisition, and any construction on USFS land would require a construction easement. Additionally, construction under this alternative would be temporary in nature and would not result in a long-term increase in vehicular trips, similar to the proposed Project.

Section 4.17, Transportation, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure TRA-1. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Tribal Cultural Resources

Under the Underground Installation Only Alternative, individual fiber projects would only 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. Similar to the proposed Project, under this alternative, Mitigation Measures TCR-1 and TCR-2 would be required to be implemented to address the unanticipated discoveries of TCRs through AB 52 consultation procedures.

Section 4.18, Tribal Cultural Resources, of the Draft PEIR concluded that the proposed Project would result in less than significant impact to tribal cultural resources with implementation of Mitigation Measures TCR-1 and TCR-2. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Utilities and Service Systems

Under the Underground Installation Only Alternative, individual fiber projects would only 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. Similar to the proposed Project, new underground telecommunication facilities would be installed; however, this EIR analyzes all potential environmental impacts regarding installation of broadband infrastructure. Additionally, similar to the proposed Project, this alternative would not require relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or natural gas facilities. As with the proposed Project, this alternative could involve minor use of water for dust control during construction; however, it is not anticipated this alternative would require additional water supplies during operation as no population would be generated. Additionally, during construction, it is anticipated that portable toilets could be provided for workers, and waste would be hauled to an approved facility for treatment/disposal. As wastewater associated with portable toilets would be a temporary demand, this alternative would not exceed wastewater treatment requirements of the CVRWQCB or LRWQCB, similar to the proposed Project. Due to the minimal amount of solid waste generated by individual fiber projects, this alternative would not adversely affect the jurisdictions' abilities to comply with the State waste diversion requirements.

Section 4.19, Utilities and Service Systems, of the Draft PEIR concluded that the proposed Project would result in less than significant impacts to utilities and service systems. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

Wildfire

Under the Underground Installation Only Alternative, individual fiber projects would only install underground fiber optic lines and would utilize new or existing underground conduit. Although fiber optic lines do not carry an electrical charge, fire risks associated with construction under this alternative would require adherence to CBC Chapter 7A and Public Resources Code 4291, similar to the proposed Project. Similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, as required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County.

Section 4.20, Wildfire, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure TRA-1. The Underground Installation Only Alternative would result in similar impacts as compared to the proposed Project. (*Similar Impact*)

2. Feasibility and Relationship to Project Objectives

The Underground Installation Only Alternative would result in fewer impacts to aesthetics; similar impacts to agriculture and forestry resources, biological resources, cultural resources, hydrology and water quality, land use planning, mineral resources, noise, population and housing, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire; and greater impacts to air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, and public services. Following is a discussion of the Underground Installation Only Alternative's ability to attain the Project Objectives:

- ***Promote the construction of a broadband network in unincorporated and incorporated areas of El Dorado County;***

The Underground Installation Only alternative would install underground fiber optic lines in new or existing underground conduit. Under this alternative, the installation of new underground conduit may not be feasible in some locations in the County, which would not promote the expansion of the broadband network as effectively as the proposed Project. Therefore, the Underground Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Enable an increase in telework and telecommuting, with a correlated decrease in vehicle miles traveled;***

The Underground Installation Only alternative would install underground fiber optic lines in new or existing underground conduit. Under this alternative, the installation of new underground fiber optic conduit may not be feasible in some locations in the County, which would not enable an increase in telework and telecommuting, with a correlated decrease in VMT, as effectively as the proposed Project. The Underground Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies;***

The Underground Installation Only alternative would install underground fiber optic lines in new or existing underground conduit. Under this alternative, the installation of new underground fiber optic conduit may not be feasible in some locations in the County, which would not improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies as effectively as the proposed Project. Therefore, the Underground Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Streamline the environmental review process for individual fiber projects that are implemented in the County;***

The Underground Installation Only alternative would install underground fiber optic lines in new or existing underground conduit. However, this alternative would not serve to streamline the environmental review process for individual fiber projects that seek to include aerially installation as effectively as the proposed Project. Therefore, the Underground Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Identify known environmental and cultural assets to be protected and/or restored with an approved set of preservation measures and/or mitigations; and,***

The Underground Installation Only alternative would install underground fiber optic lines in new or existing underground conduit. The installation of new underground fiber optic may not be feasible in some locations in the County, which would exclude the identification of environmental and cultural assets in those locations under this alternative. Therefore, Underground Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

- ***Save time and money for both El Dorado County and broadband project applicants, resulting in greater government and economic efficiencies, reducing the amount of County staff time required to review broadband projects and avoiding duplication of applicant costs.***

The Underground Installation Only alternative would install underground fiber optic lines in new or existing underground conduit. However, as this alternative would not serve to streamline the environmental review process for individual fiber projects that seek to include utility poles, this alternative would not save time and money for the County and individual broadband project applicants. The Underground Installation Only alternative would attain this objective, but not as effectively as the proposed Project.

Alternative 4: Use of Existing Infrastructure Only Alternative

The Use of Existing Infrastructure Alternative would include individual fiber projects that install fiber optic line in existing fiber-specific conduit or along existing utility poles. Under this alternative, no new utility poles or underground conduit would be installed. This alternative was considered because it would avoid or reduce most impacts associated with the proposed Project, as outlined in the Program EIR, as fewer individual fiber projects would be implemented, and therefore less construction and ground disturbance. This alternative would avoid impacts to aesthetic and visual resources, because the stringing of aerial fiber optic line would occur along existing utility poles, which would not introduce new vertical features within the viewshed of scenic vistas or State Scenic Highways in the County. However, this alternative would not meet the basic Project Objectives associated with providing a reliable system of broadband communications in El Dorado

County, because it would not provide for the expansion of broadband infrastructure into portions of the service area that do not already include sufficient conduit, utility poles, and supporting infrastructure.

1. Potential Impacts of the Use of Existing Infrastructure Alternative in Comparison to the Project

Aesthetics

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Aesthetic impacts related to construction under this alternative would be similar to the proposed Project, as all construction activities would be temporary and short-term. Under this alternative, the installation of fiber optic lines in existing underground conduit would not be visible. The installation of aboveground fiber optic line under this alternative would not change the visual character of the Project area, as individual fiber projects would utilize existing infrastructure and would not construct new utility poles within the viewsheds of scenic vistas or U.S. 50, SR 89, and SR 88, portions of which are designated State Scenic Highways within the County. Therefore, this alternative would result in reduced aesthetic impacts as compared to the proposed Project.

Section 4.1, Aesthetics, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure AES-1. The Use of Existing Infrastructure Alternative would result in reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Agriculture and Forestry

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. No new underground conduit or utility poles would be installed under this alternative. Similar to the proposed Project, this alternative would be primarily located within previously disturbed and/or developed areas and would not convert or conflict with agriculture or forestry resources. However, as this alternative would utilize existing infrastructure, less construction and ground disturbance would occur, which would result in slightly reduced impacts to agriculture and forestry resources as compared to the proposed Project.

Section 4.2, Agriculture and Forestry Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to agriculture and forestry resources. The Use of Existing Infrastructure Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Air Quality

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Section 4.3, Air Quality, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures AQ-1 and AQ-2. Although ground disturbance would be required to install fiber optic line into existing underground conduit, it is anticipated that ground disturbance would be slightly reduced as compared to the proposed Project, as fiber optic line could be pulled through the existing conduit, and no new conduit would be installed.

Construction methods required for aerial installation under this alternative would be limited to the aerial stringing of fiber optic line along existing utility poles. Some areas of the County are known to contain NOA and ADL; the reduced ground disturbance impacts associated with the Use of Existing Infrastructure Only Alternative would result in reduced air quality impacts associated with exposure to pollutant concentrations. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. A backup generator may be used in the event of a power outage or for routine testing, similar to the proposed Project. As this alternative would utilize existing fiber-specific conduit or existing utility poles, construction-related impacts would be slightly reduced as compared to the proposed Project.

Section 4.3, Air Quality, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measure AQ-1 and AQ-2. The Use of Existing Infrastructure Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Biological Resources

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, individual fiber projects would be required to prepare a BRA, as outlined in Mitigation Measure BIO-1 to reduce impacts to a less than significant level. If it is determined in the BRA that there is the potential for impacts to special-status species, recommended mitigation and/or avoidance measures detailed in Mitigation Measures BIO-2 through BIO-8 shall be included in the project-specific BRA as required by Mitigation Measure BIO-1. With implementation of Mitigation Measure BIO-9, potential impacts to jurisdictional waters, wetlands, and/or sensitive natural communities that may occur within the Project area would be reduced to less than significant. With the implementation of Mitigation Measure BIO-10, potential impacts to oak resources that may occur within the Project area would be reduced to less than significant. However, as less construction and ground disturbance would occur under this alternative, the potential impacts on biological resources would be slightly reduced as compared to the proposed Project.

Section 4.4*,* Biological Resources, of the Draft PEIR concluded that the proposed Project would result in less than significant impact with implementation of Mitigation Measures BIO-1 through BIO-10. The Use of Existing Infrastructure Only Alternative would result in reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Cultural Resources

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. As this alternative would not install new utility poles, individual fiber projects would not introduce new visual elements to areas with concentrations of historical built environment cultural resources such as buildings and structures that comprise historic districts. There would be no change in the existing visual signature of the vicinity. Therefore, this alternative would result in slightly reduced impacts as compared to the proposed Project. Similar to the proposed Project, individual fiber projects under this alternative could impede or destroy archaeological cultural resource's ability to convey their significance, which can embody scientific and/or traditional cultural value. Mitigation Measure CUL-1 and CUL-2 would be required to be implemented under this alternative, and under the proposed

Project, to mitigate or avoid archaeological cultural resource impact scenarios. However, as less construction and ground disturbance would occur under this alternative, the potential impacts on cultural resources would be slightly reduced as compared to the proposed Project.

Section 4.5, Cultural Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures CUL-1 and CUL-2. The Use of Existing Infrastructure Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Energy

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. However, as less construction and ground disturbance would occur under this alternative, this alternative would result in a slightly reduced impact to energy associated with construction as compared to the proposed Project. Operation under this alternative would be similar to the proposed Project, as this alternative would not generate new vehicle trips beyond occasional maintenance activities. Further, operation of fiber optic lines themselves would not utilize energy; rather, the fiber optic lines transfer data. Similar to the proposed Project, this alternative would not conflict with or obstruct a State or local plan for renewable energy efficiency.

Section 4.6, Energy, of the Draft PEIR, concluded that the proposed Project would result in a less than significant impact on energy efficiency. The Underground Installation Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Geology and Soils

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles, which would result in reduced above ground construction activities as compared to the proposed Project. As compared to the proposed Project, this alternative would have similar risks of exposing people or structures to landslides, lateral spreading, subsidence, liquefaction, soil erosion, or seismic impacts as construction would occur within County limits. However, as less construction and ground disturbance would occur under this alternative, this alternative would result in a slightly reduced impact to soil erosion.

Section 4.7, Geology and Soils, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to geology and soils. The Use of Existing Infrastructure Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Greenhouse Gas Emissions

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR, concluded that the proposed Project would result in a less than significant impact to GHGs associated with construction. This alternative would result in slightly reduced impacts to GHGs associated with construction, as construction activities would be limited to the installation of fiber optic line in existing fiber-specific conduit or along existing utility poles. Operation under this alternative would be similar to the proposed Project, as this

alternative would also not generate new vehicle trips beyond occasional maintenance activities. GHG emissions are addressed within the El Dorado County General Plan, City of South Lake Tahoe General Plan, and the TRPA Regional Plan. Similar to the proposed Project, this alternative would be consistent with the El Dorado County General Plan, City of South Lake Tahoe General Plan, and the TRPA Regional Plan.

Section 4.8, Greenhouse Gas Emissions, of the Draft PEIR concluded that the proposed Project would result in a less than significant impacts to GHG emissions. The Use of Existing Infrastructure Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Hazards and Hazardous Materials

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles, which would result in reduced above ground construction activities as compared to the proposed Project. Although ground disturbance would be required to install fiber optic line into existing underground conduit, it is anticipated that ground disturbance would be slightly reduced as compared to the proposed Project, as fiber optic line could be pulled through the existing conduit, and no new conduit would be installed. Similar to the proposed Project, small quantities of hazardous materials may be stored, used, and handled during construction activities or during routine maintenance checks, and may be located within one quarter mile of a school. Individual fiber projects under this alternative would be required to implement and comply with existing hazardous material regulations, similar to the proposed Project. Some areas of the County are known to contain NOA and ADL; the reduced ground disturbance under this alternative would reduce the potential risk of exposure to hazardous materials. Further, this alternative would not construct any new utility poles or include permanent structures for human occupancy; therefore, individual fiber projects would not interfere with airport operations or expose residents to airport-related noise. As this alternative would utilize existing conduit and/or utility poles in previously disturbed areas, the area would have already been evaluated for hazardous materials; therefore, individual fiber projects under this alternative would not be required to prepare a Phase I ESA. Similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County.

Section 4.9, Hazards and Hazardous Materials, of the Draft PEIR concluded that the proposed Project would result in less than significant impact with implementation of Mitigation Measures AQ-2 and TRA-1. The Use of Existing Infrastructure Only Alternative would result in a reduced impact as compared to the proposed Project. (*Reduced Impact*)

Hydrology and Water Quality

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Under this alternative, individual fiber projects would be constructed on existing broadband infrastructure primarily within previously disturbed areas. Similar to the proposed Project, if this alternative would disturb more than one acre of soil, a SWPPP with project-specific BMPs would be required for each individual fiber project. Operation under this alternative would require occasional maintenance needs and all construction areas would be cleared, similar to the proposed Project. As with the proposed

Project, this alternative could involve minor use of water for dust control during construction; however, it is not anticipated this alternative would require additional water supplies during operation as no population would be generated. However, as this alternative would utilize existing infrastructure, less construction and ground disturbance would occur, which would result in slightly reduced impacts to hydrology and water quality.

Section 4.10, Hydrology and Water Quality, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to hydrology and water quality. The Use of Existing Infrastructure Alternative would result in a reduced impact as compared to the proposed Project. (*Reduced Impact*)

Land Use and Planning

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. As with the proposed Project, the installation of broadband infrastructure this alternative would not interfere with the continuation of existing aboveground uses after construction is completed and would not physically divide an established community. Prior to issuance of all applicable permits, individual fiber projects under this alternative would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances, similar to the proposed Project. Additionally, as with the proposed Project, this alternative would not conflict with any land use plan, policy, or regulation. Under this alternative, individual fiber projects would be planned based on such considerations as construction feasibility, local preference, and locations of sensitive environmental resources, similar to the proposed Project. However, as fewer individual fiber projects would be implemented under this alternative, this alternative would result in a slightly reduced impact on land use and planning.

Section 4.11, Land Use and Planning, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to land use and planning. The Use of Existing Infrastructure Only Alternative would result in a slightly reduced impact as compared to the proposed Project. (*Reduced Impact*)

Mineral Resources

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. This alternative would utilize new or existing utility poles located within previously disturbed and/or developed areas; as such, this alternative would not interfere with the existing mines or mineral land classification studies in El Dorado County, similar to the proposed Project. However, as less construction and ground disturbance would occur under this alternative, this alternative would result in a slightly reduced impact on mineral resources.

Section 4.12, Mineral Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to mineral resources. The Use of Existing Infrastructure Only Alternative would result in a reduced impact as compared to the proposed Project. (*Reduced Impact*)

Noise

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, construction of individual fiber projects under this alternative would be required to limit construction hours and implement construction noise BMPs, as outlined under Mitigation Measure NOI-1. Similar to the proposed Project, the Use of Existing Infrastructure Only Alternative would require emergency backup generators to be located more than 60 feet from a NSLU in a community area or 105 feet of a NSLU in a rural area or provide sound reduction measures to reduce noise from generators to less than 50 dBA measured at affected NSLUs, as outlined in Mitigation Measure NOI-2. Additionally, similar to the proposed Project, if construction under this alternative would use a vibratory roller, Mitigation Measure NOI-3 would require vibratory rollers to be used in static mode only (no vibrations) in proximity to occupied buildings or fragile structures. Both the proposed Project and this alternative would not expose people residing or working in the project area to excessive noise levels from public use or private airstrips. However, as this alternative would utilize existing infrastructure, less construction and ground disturbance would occur, which would result in slightly reduced impacts related to noise.

Section 4.13, Noise, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures NOI-1 through NOI-3. The Use of Existing Infrastructure Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Population and Housing

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, this alternative would not directly induce population growth, as the Project would not create a substantial number of jobs, promote the construction of jobs, or remove any obstacles that currently impede growth in the County. Additionally, similar to the proposed Project, this alternative would not displace people or housing or require the construction of replacement housing. However, as this alternative would utilize existing infrastructure, fewer local jobs related to construction of individual fiber projects would be generated, which would result in slightly reduced impacts related to population and housing.

Section 4.14, Population and Housing, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact on population and housing. The Use of Existing Infrastructure Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Public Services

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, this alternative would not require the construction of housing and would not contribute to substantial unplanned population growth. Therefore, the proposed Project would not generate any additional residential population that would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities in order to

maintain acceptable service ratios, response times or other performance objectives for any public services including fire protection, police protection, schools, parks, or other public facilities. However, under this alternative, broadband infrastructure would not be expanded throughout the County. As such, operation under this alternative would not introduce a wider or more reliable network that would improve public health and safety through enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies. Therefore, impacts under this alternative related to police and fire protection would be slightly greater as compared to the proposed Project.

Section 4.15, Public Services, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to fire protection, police protection, schools, and other public facilities, and no impact to parks. The Use of Existing Infrastructure Only Alternative would result in greater impacts to fire protection and police protection as compared to the proposed Project, and similar impact to schools, parks, or other public facilities. (*Greater Impact*)

Recreation

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, implementation of this alternative would not require the construction of housing and, therefore, would not contribute to substantial unplanned population growth. As such, the proposed Project would not generate an increased use of neighborhood or regional parks or other recreational facilities. Additionally, implementation of both the proposed Project and this alternative would not include or require the construction or expansion of recreational facilities.

Section 4.16, Recreation, of the Draft PEIR concluded that the proposed Project would result in no impact to recreation. Similar to the proposed Project, no impact would occur under the Use of Existing Infrastructure Only Alternative. (*Similar Impact*)

Transportation

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, as required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County. Depending on the location of individual fiber projects, an Encroachment Permit application would be required to be submitted to the County Department of Transportation, City of Placerville Engineering Department, City of South Lake Tahoe Development Services Department, or Caltrans District 3 for review and approval. Any construction on BLM land would require the ROW acquisition, and any construction on USFS land would require a construction easement. Additionally, construction under this alternative would be temporary in nature and would not result in a long-term increase in vehicular trips, similar to the proposed Project. However, as less construction would occur under this alternative, and therefore fewer potential lane closures, this alternative would result in a slightly reduced impact on transportation.

Section 4.17, Transportation, of the Draft PEIR concluded that the proposed Project would result in less than significant impact with implementation of Mitigation Measure TRA-1. The Use

of Existing Infrastructure Alternative would result in a slightly reduced impact on transportation as compared to the proposed Project. (*Reduced Impact*)

Tribal Cultural Resources

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. Similar to the proposed Project, under this alternative, Mitigation Measures TCR-1 and TCR-2 would be required to be implemented to address the unanticipated discoveries of TCRs through AB 52 consultation procedures. However, as less construction and ground disturbance would occur under this alternative, the potential impacts on TCRs would be slightly reduced as compared to the proposed Project.

Section 4.18, Tribal Cultural Resources, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact with implementation of Mitigation Measures TCR-1 and TCR-2. The Use of Existing Infrastructure Only Alternative would result in slightly reduced impacts as compared to the proposed Project. (*Reduced Impact*)

Utilities and Service Systems

Under the Use of Existing Infrastructure Only Alternative, fiber optic line would be installed in existing fiber-specific conduit or along existing utility poles. This alternative would not include the construction of new underground conduit or utility poles; as such, broadband network would not be expanded into areas of the County that lack existing infrastructure to support the installation of fiber optic line. Therefore, this alternative would result in reduced telecommunication impacts as compared to the proposed Project. However, similar to the proposed Project, this alternative would not require relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, or natural gas facilities. As with the proposed Project, this alternative could involve minor use of water for dust control during construction; however, it is not anticipated this alternative would require additional water supplies during operation as no population would be generated. Additionally, during construction, it is anticipated that portable toilets could be provided for workers, and waste would be hauled to an approved facility for treatment/disposal. As wastewater associated with portable toilets would be a temporary demand, this alternative, would not exceed wastewater treatment requirements of the CVRWQCB or LRWQCB, similar to the proposed Project. Due to the minimal amount of solid waste generated by individual fiber projects, this alternative would not adversely affect the jurisdictions' abilities to comply with the State waste diversion requirements. However, as this alternative would utilize existing infrastructure, less construction and ground disturbance would occur, which would result in slightly reduced impacts to utilities and service systems.

Section 4.19, Utilities and Service Systems, of the Draft PEIR concluded that the proposed Project would result in a less than significant impact to utilities and service systems. The Use of Existing Infrastructure Alternative would result in a slightly reduced impact as compared to the proposed Project. (Reduced *Impact*)

Wildfire

Under the Use of Existing Infrastructure Only Alternative, individual fiber projects would utilize existing utility poles or underground fiber-specific conduit. Although fiber optic lines do not carry

an electrical charge, fire risks associated with construction under this alternative would require adherence to CBC Chapter 7A and Public Resources Code 4291, similar to the proposed Project. Similar to the proposed Project, construction under this alternative may cause lane closures and would be required to submit a Traffic Control and Detour Plan, as required under Mitigation Measure TRA-1, consistent with an Encroachment Permit and code requirements of El Dorado County. However, as less construction would occur under this alternative, and therefore fewer potential lane closures, this alternative would result in a slightly reduced impact on wildfire.

Section 4.20, Wildfire, of the Draft PEIR concluded that the proposed Project would result in less than significant impact with implementation of Mitigation Measure TRA-1. The Use of Existing Infrastructure Alternative would result in a slightly reduced impact as compared to the proposed Project. (*Reduced Impact*)

2. Feasibility and Relationship to Project Objectives

The Use of Existing Infrastructure Only Alternative would result in fewer impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, transportation, tribal cultural resources, utilities and service systems, and wildfire; similar impacts to recreation; and greater impacts to public services. The following is a discussion of the Use of Existing Infrastructure Only Alternative's ability to attain the Project Objectives:

- ***Promote the construction of a broadband network in unincorporated and incorporated areas of El Dorado County;***

The Use of Existing Infrastructure Only Alternative would install fiber optic line in existing fiber-specific conduit or along existing utility poles. Under this alternative, fiber optic line would only be installed in areas of the County with existing broadband infrastructure, which would not promote the expansion of the broadband network as effectively as the proposed Project. Therefore, the Use of Existing Infrastructure Only Alternative would attain this objective, but not as effectively as the proposed Project.

- ***Enable an increase in telework and telecommuting, with a correlated decrease in vehicle miles traveled;***

The Use of Existing Infrastructure Only Alternative would install fiber optic line in existing fiber-specific conduit or along existing utility poles. Under this alternative, fiber optic line would only be installed in areas of the County with existing broadband infrastructure, which would not enable an increase in telework and telecommuting, with a correlated decrease in VMT, as effectively as the proposed Project. Therefore, the Use of Existing Infrastructure Only Alternative would attain this objective, but not as effectively as the proposed Project.

- ***Improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies;***

The Use of Existing Infrastructure Only Alternative would install fiber optic line in existing fiber-specific conduit or along existing utility poles. Under this alternative, fiber optic line would only

be installed in areas of the County with existing broadband infrastructure, which would not improve public health and safety through enhancing telemedicine, enabling faster emergency response, enhanced communication between emergency services, and access to critical information during disasters or emergencies as effectively as the proposed Project. Therefore, the Use of Existing Infrastructure Only Alternative would not attain this objective.

- ***Streamline the environmental review process for individual fiber projects that are implemented in the County;***

The Use of Existing Infrastructure Only Alternative would install fiber optic line in existing fiber-specific conduit or along existing utility poles. Under this alternative, fiber optic line would only be installed in areas of the County with existing broadband infrastructure; as such, this alternative would not serve to streamline the environmental review process for individual fiber projects that seek to include existing utility poles or underground conduit. Therefore, the Use of Existing Infrastructure Only Alternative would attain this objective, but not as effectively as the proposed Project.

- ***Identify known environmental and cultural assets to be protected and/or restored with an approved set of preservation measures and/or mitigations; and,***

The Use of Existing Infrastructure Only Alternative would install fiber optic line in existing fiber-specific conduit or along existing utility poles. As this alternative would only utilize existing conduit and/or utility poles, the area would have already been evaluated for environmental and cultural assets. Therefore, this alternative would exclude the identification of environmental and cultural assets in locations outside of the alternative project area. Therefore, the Use of Existing Infrastructure Only Alternative would not attain this objective.

- ***Save time and money for both El Dorado County and broadband project applicants, resulting in greater government and economic efficiencies, reducing the amount of County staff time required to review broadband projects and avoiding duplication of applicant costs.***

The Use of Existing Infrastructure Only Alternative would install fiber optic line in existing fiber-specific conduit or along existing utility poles. Under this alternative, fiber optic line would only be installed in areas of the County with existing broadband infrastructure; therefore, this alternative would not serve to streamline the environmental review process for individual fiber projects that seek to include existing utility poles or underground conduit. As such, this alternative would not save time and money for the County and individual broadband project applicants as effectively as the proposed Project. Therefore, the Use of Existing Infrastructure Only Alternative would attain this objective, but not as effectively as the proposed Project.

X. STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the Board's approval of the Project will not result in significant and unavoidable impacts. Therefore, a statement of overriding considerations is not warranted.