Georgetown Broadband Fiber Project

Project-Specific Addendum Checklist to the El Dorado County Broadband Fiber Project Program Environmental Impact Report

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ACRONYMS AND ABBREVIATIONS

AB 52	Assembly Bill 52
ADL	Aerially Deposited Lead
ALUCP	Airport Land Use Compatibility Plan
BMP	Best Management Practice
BOS	Board of Supervisors
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHP	California Highway Patrol
CO	carbon monoxide
County	County of El Dorado
CVRWQCB	Central Valley Regional Water Quality Control Board
dBA	A-weighted Decibel
DMV	Department of Motor Vehicles
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EDCAQMD	El Dorado County Air Quality Management District
EDCTC	El Dorado County Transportation Commission
EDWA	El Dorado Water Agency
EIR	Environmental Impact Report
EQ Zapp	California Earthquake Hazards Zone Application
ESA	Phase I Environmental Site Assessment
FCC	Federal Communications Commission
FDCP	Fugitive Dust Control Plan
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FRA	Federal Responsibility Area
GHG	Greenhouse Gas

ACRONYMS AND ABBREVIATIONS (cont.)

HSC	Health and Safety Code
ISP	Internet Service Providers
LSAA	Lake and Streambed Alteration Agreement
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MM	Mitigation Measures
NAAQS	National Ambient Air Quality Standards
ND	Negative Declaration
NFHL	National Flood Hazard Layer
NO_x	nitrogen oxides
NOA	Naturally Occurring Asbestos
NOE	Notice of Exemption
NSLU	Noise Sensitive Land Use
OEHHA	Office of Environmental Health Hazard Assessment
PEIR	Program Environmental Impact Report
PM	Particulate Matter
PPV	peak particle velocity
Proposed project	Georgetown Broadband Fiber Project
PSA	Project-Specific Addendum
RF	radiofrequency
ROG	Reactive organic gases
ROW	right-of-way
SGMA	Sustainable Groundwater Management Act
SMAQMD	Sacramento Metropolitan Air Quality Management District
SR	State Route
SRA	State Resource Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TCR	tribal cultural resources
TRPA	Tahoe Regional Planning Agency
USACE	U.S. Army Corps of Engineers
VIA	Visual Impact Assessment

ACRONYMS AND ABBREVIATIONS (cont.)

VMT	vehicle miles traveled
WEAP	Worker Environmental Awareness Program
WRDMP	Water Resource Development and Management Plan

1.0 INTRODUCTION

The El Dorado County Board of Supervisors (BOS) certified the Program Environmental Impact Report (PEIR) for the El Dorado County Broadband Fiber Project (State Clearinghouse No. 2024081255) which evaluated the installation of fiber optic conduit either underground in buried conduits, overhead on existing or newly constructed utility pole lines, or in a combination of both throughout the County of El Dorado (County). The PEIR was prepared to meet the requirements as defined in the California Environmental Quality Act (CEQA) Guidelines Section 15168(c) for streamlining later activities. In accordance with Section 15168 of the CEQA Guidelines, a PEIR may be prepared on a series of actions that can be characterized as one large project and are related to, among other things, the issuance of general criteria to govern the conduct of a continuing program or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

This project-specific addendum (PSA) checklist process was designed during the PEIR preparation for use by project proponents to streamline the environmental review process for individual broadband projects within the County. This PSA checklist is a modified Appendix G Environmental Checklist Form, pursuant to CEQA Guidelines Section 15162, and is used to determine whether the proposed Georgetown Broadband Fiber Project (proposed project) qualifies as a later activity within the scope of the analysis in the PEIR (CEQA Guidelines Section 15168[c]).

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

2.0 PROJECT-SPECIFIC ADDENDUM CHECKLIST

2.1 INFORMATION SHEET

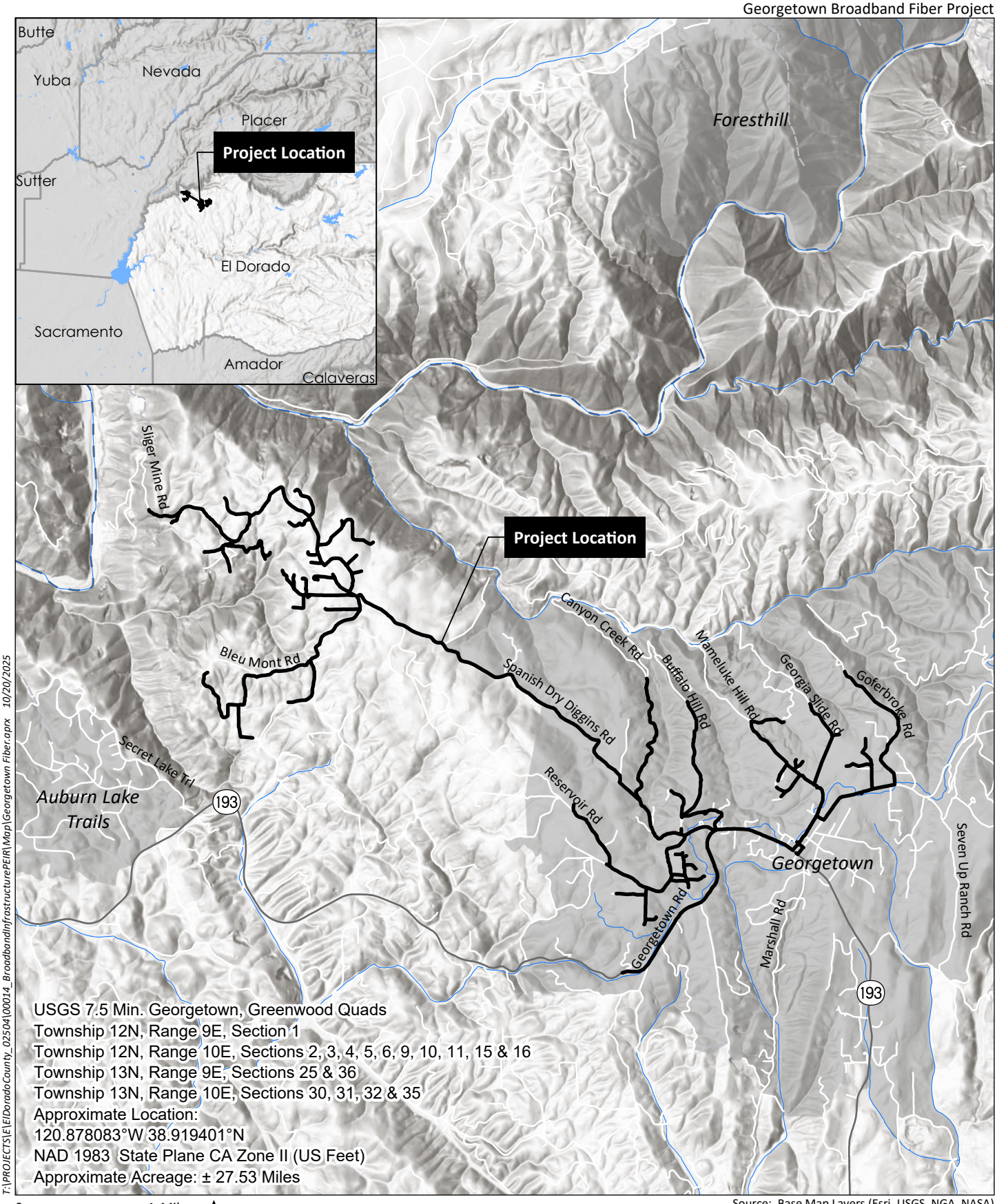
1.	Project title:	Georgetown Broadband Fiber Project
2.	Lead agency name and address:	County of El Dorado Economic Development Division 2850 Fairlane Court Placerville, CA 95667
3.	Contact person and phone number:	Robert Peters, Deputy Director of Planning Planning and Building Department (530) 621-6644
4.	Project location:	Georgetown, El Dorado County, California
5.	General plan designation:	Various El Dorado County General Plan land use designations
6.	Zoning:	Various El Dorado County Zoning designations

7. Description of project:

The Georgetown Broadband Fiber Project (proposed project) would include the installation of underground broadband infrastructure in the unincorporated community of Georgetown in El Dorado County (County), California. The proposed broadband infrastructure would include the installation of underground fiber optic lines within approximately 27.87 miles of previously disturbed rights-of-way (ROW) and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. Although allowed under the PEIR, no aboveground broadband infrastructure is proposed under this project.

8. Surrounding land uses and setting:

The specific location of the proposed underground broadband infrastructure includes approximately 27.87 miles of previously disturbed ROW and road corridors and within existing easements. The project is located within a rural residential area of the County and is surrounded by various land uses. See Figure 1 for the regional location and Figure 2 for an aerial map of the proposed project.



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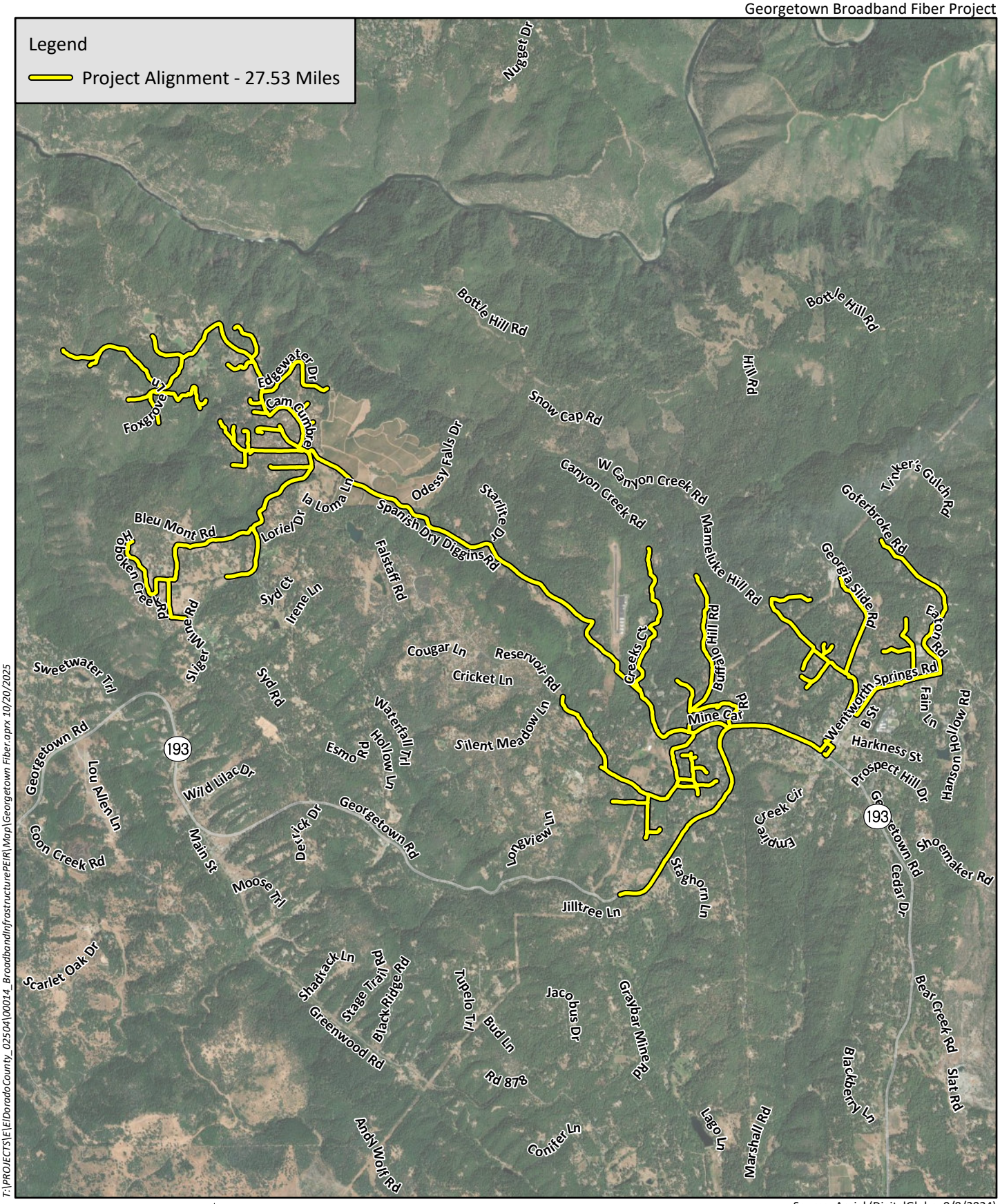
Source: Base Map Layers (Esri, USGS, NGA, NASA)

HELIX Environmental Planning

Site and Vicinity Map

Figure 1



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0 4,500 Feet

Source: Aerial (DigitalGlobe, 9/9/2024)

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Aerial Map

Figure 2

9. Required Actions

A listing and brief description of the approvals and/or regulatory permits required to implement the proposed project are provided below. This environmental document is intended to address the environmental impacts associated with the following discretionary actions and approvals.

El Dorado County

- **Grading Permit**
- **Encroachment Permit**
- **Consideration of the Environmental Document:** El Dorado County will act as the Lead Agency as defined by CEQA and will have authority to determine if the environmental document (Addendum) is adequate under CEQA and CEQA Guidelines.
- **Project Approval:** El Dorado Planning Director will consider approval of the project, and the entitlements described above.

Other Local, State, or Federal Agencies

- **California Department of Fish and Wildlife (CDFW):** Lake and Streambed Alteration Agreement (LSAA) if it is determined that impacts to jurisdictional water or other sensitive natural communities cannot be avoided.
- **California Department of Transportation (Caltrans):** Encroachment Permit from Caltrans District 3.
- **Central Valley Regional Water Quality Control Board (CVRWQCB):** Construction General Permit, including the submittal of and adherence to a Stormwater Pollution Prevention Plan (SWPPP), as well as prohibitions on the release of oils, grease, or other hazardous materials during construction. The project applicant and/or construction contractor would be required to file a Notice of Intent with the CVRWQCB.
- **U.S. Army Corps of Engineers (USACE):** Nationwide Permit or Individual Permit under Section 404 of the Clean Water Act when dredged or fill material may be discharged into waters of the U.S

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

Formal invitations to participate in Assembly Bill (AB) 52 consultation on the proposed project were sent by the County as the Lead Agency to eight tribal representatives on May 7, 2025. The tribal representatives included:

- Sara Dutschke, Chairperson; Ione Band of Miwok Indians

- Cosme Valdez, Chairperson; Nashville Enterprise Miwok-Maidu-Nishinam Tribe
- Regina Cuellar, Chairperson; Shingle Springs Band of Miwok Indians
- Ben Cunningham-Summerfield; Tsi Akim Maidu
- Gene Whitehouse, Chairperson; United Auburn Indian Community of the Auburn Rancheria (UAIC)
- Darrel Cruz; Washoe Tribe of Nevada and California
- Herbert Griffin; Wilton Rancheria
- Dahlton Brown, Director of Administration; Wilton Rancheria

Each tribe was provided with a brief description of the project and its location, the contact information for the County's authorized representative, and a notification that the tribe has 30 days to request consultation. The County received a response from the Wilton Rancheria Cultural Preservation Department on May 14, 2025, stating that although the project is within the ancestral territory of the Wilton Rancheria, they do not have any comments and do not wish to open consultation at this time. The County also received a response from UAIC on June 10, 2025 and a response from the Shingle Springs Band of Miwok Indians on June 17, 2025, both requesting to formally initiate consultation. The County met with UAIC on December 11, 2025, to discuss the proposed project and have had ongoing meetings with both the Shingle Springs Band of Miwok Indians and UAIC. The County sent the cultural fieldwork maps to the Shingle Springs Band of Miwok Indians and UAIC for the Tribes to review and provide their input prior to initiation of the fieldwork to be conducted by the project archaeologists. During the tribal consultation process, UAIC provided the County with language to further clarify the procedures if existing or previously undiscovered TCRs, archaeological, or cultural resources are discovered during any future ground disturbing activities and this language is included in Section 5.XVIII, Tribal Cultural Resources, of this PSA. UAIC also provided the County with a tribal monitoring sensitivity map that identified segments in red that will be monitored by a tribal representative from the UAIC; this sensitivity map is confidential and on file with the County. No further responses have been received to date.

3.0 PROJECT DESCRIPTION

3.1 PROJECT LOCATION AND COMPONENTS

The proposed project would include the installation of approximately 27.87 miles of underground broadband infrastructure within the unincorporated community of Georgetown, El Dorado County, California. The proposed broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. An approximately 1.5-mile segment of the project alignment would be located along State Route (SR) 193 within Caltrans ROW. It is anticipated that the average depth of trenching for buried conduits would be 5 feet; however, depending on the specific location of the fiber optic lines, the depth of the buried conduit could be deeper to avoid underground obstacles, including existing culverts, pipelines, etc. All underground fiber optic lines would be new, proposed infrastructure. Although allowed under the PEIR, no aboveground broadband infrastructure is proposed under the project.

See Figure 1 for the regional location and Figure 2 for an aerial map of the proposed project.

3.2 PROJECT CONSTRUCTION

Construction Schedule and Methods

Construction of the project is anticipated to begin in 2026 and be completed in 2027. Construction activities would occur between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on weekends.

The construction methods for the project would include jack and bore, trench, plow, and missile. The jack and bore method is a trenchless construction technique which involves drilling a pilot bore string towards existing access points, then attaching the conduit and pulling it back to install it. Temporary work areas would be established at the entry and exit pits for the bore rig and installation of access vaults. Trenching would be employed in areas where plowing is unsuitable, typically due to rocky soil or existing underground infrastructure. A backhoe or similar equipment would create a trench of varying width and depth, and the conduit would be placed at the bottom before backfilling and compacting the trench. In narrow or sensitive areas, pavement cutting and narrow trenching may be necessary, with slurry backfilling and repaving. A plowing technique could be used in unpaved areas, where a vibratory cable plow incises the soil and lays the conduits simultaneously. Tracked vehicles are typically used for plowing. In wet or soft conditions, a specialized "spider plow" may be used to minimize disturbance. Missile is a trenchless construction technique that could be used for short runs under an obstacle with fairly soft dirt. The missile technique would involve pushing a boring head through the dirt using an impact piston driven by a big air compressor at the surface.

Preconstruction Activities

A Worker Environmental Awareness Program (WEAP) would be implemented prior to construction to educate workers about the County's sensitive biological and cultural resources, as well as potential contamination risks. All field staff, including employees, contractors, and subcontractors involved in construction, would be required to participate in the WEAP. The WEAP would communicate policies, mitigation measures, and protective measures that must be followed, such as avoiding ground disturbing near sensitive biological or cultural resources. In the case of hazardous material concerns,

workers would be informed and the Georgetown Fire Protection District would be notified depending on the location of the hazardous concern. Additionally, staff would be educated about proper handling and disposal procedures for hazardous wastes according to federal, State, and local regulations.

Surface Restoration

Site cleanup and surface restoration under the project would be performed promptly following broadband infrastructure installation. Cleanup would include removing construction-related debris and restoring original surfacing and contours. Any disturbed areas would be returned to their original or better condition by replacing all asphalt, landscaping, or any earthen areas.

Construction Staging Areas and Equipment

Staging areas would be located along roadway cross-sections. If road constraints prevent locating staging areas along roadways, alternative areas such as previously disturbed private or public land would be used. The exact locations of staging areas and equipment lay-down areas would be determined during the final construction plans. Construction companies awarded contracts for specific segments would select the staging area locations. Staging areas would be used to mobilize crews, and refueling would not take place in the field.

The construction methods for the project would include jack and bore, trench, plow, and missile. The equipment used may include bore/drill rigs, cranes, generator sets, excavators, tractors, loaders, backhoes, crawler tractors, concrete/individual saws, rollers, and cement and mortar mixes. The fiber installation locations would be accessible by trucks and other construction equipment, and helicopter use would not be necessary.

3.3 PROJECT OPERATIONS

Operational activities for the project would be limited to routine maintenance and emergencies. Infrastructure such as circuit cabinets with cooling fans and/or stand-by generators that may be associated with the project, may be routinely checked, as needed.

4.0 DETERMINATION

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

☒ I find that all of the effects of the proposed project (a) have been covered in the El Dorado County Broadband Fiber Project PEIR, and (b) all applicable mitigation measures identified in the El Dorado County Broadband Fiber Project PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the El Dorado County Broadband Fiber Project PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.

☐ I find that the proposed project will have effects that were not covered in the El Dorado County Broadband Fiber Project PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the El Dorado County Broadband Fiber Project PEIR. A **NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project will have effects that were not covered in the El Dorado County Broadband Fiber Project PEIR or will have effects that are substantially more severe than those covered in the El Dorado County Broadband Fiber Project PEIR. Although these effects may be significant in the absence of additional mitigation beyond the El Dorado County Broadband Fiber Project PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the El Dorado County Broadband Fiber Project PEIR and/or (b) substantially more severe than those covered in the El Dorado County Broadband Fiber Project PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Signature

10/1/26
Date

Karen L. Garner
Printed Name

Director of Planning and Building
Title

El Dorado County
Agency

5.0 EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the El Dorado County Broadband Fiber Project PEIR for relevant information on each environmental topic.

2. A brief explanation is required for each impact question, including impacts that have been identified in the PEIR as well as any "new impacts", if applicable.

3. The discussion of each impact question identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:

    - Briefly describe the impact of the proposed project.

    - Summarize the impact as it was presented in the PEIR, including a statement that the impact is covered in the PEIR.

    - Provide evidence that (explain why) the project impact is covered in PEIR, considering whether the proposed project is consistent with the activities addressed in the PEIR.

    - Identify Mitigation Measures (MM) from the PEIR that are applicable to the project.

    - (If applicable) Explain why the impact significance in the PSA checklist is different than that found in the PEIR; substantiate the different (new) significance conclusion.

    - (If applicable) Explain why MM identified for this impact in PEIR do not apply to this project. This circumstance may exist where a potentially significant impact was identified in the PEIR, but the impact severity would be less for the project, or the MM does not otherwise apply.

4. If the project proponent has determined that a new impact would occur, then the PSA checklist must indicate whether the new impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.

5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. An ND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the County of El Dorado Broadband Fiber Project PEIR and focus the environmental analysis solely on issues that were not addressed in the PEIR.

I. AESTHETICS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact AES-1: Have a substantial adverse effect on a scenic vista?	LTSM	Impact AES-1, pp. 4.1-13 – 4.1-14	Yes	None	LTS	No
Impact AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	LTSM	Impact AES-2, pp. 4.1-15 – 4.1-16	Yes	None	LTS	No
Impact AES-3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?	LTS	Impact AES-3, pp. 4.1-16 – 4.1-17	Yes	N/A	LTS	No
Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	Impact AES-4, pp. 4.1-18	Yes	N/A	LTS	No

[1]LTSM = Less than significant impact with mitigation. LTS = Less than significant impact.
[2]N/A = not applicable; there are no MMs identified in the PEIR for this impact. None = there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Aesthetic Impacts: Would the project result in other impacts to aesthetics that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

IMPACT ANALYSIS

Impact AES-1: Would the project have a substantial adverse effect on a scenic vista?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that scenic vistas in the County could be affected by the operation of aboveground individual fiber projects located within the viewshed of the scenic vista. However, with implementation of Mitigation Measure AES-1, which would require the preparation of a Visual Impact Assessment (VIA) if any aboveground individual fiber project is proposed within the viewshed of a designated scenic vista, eligible State Scenic Highway, and/or designated State Scenic Highway, project-specific impacts on scenic vistas were to determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of approximately 27.87 miles of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines in within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project.

The nearest scenic vistas, as identified in Figure 4.1-1 of the PEIR, are located approximately 40 miles east of the proposed project site. Construction activities would be short-term and temporary and would not permanently or substantially obstruct views from scenic vistas. The installation of fiber optic lines would be underground and not visible. Therefore, as the proposed project is not located within the vicinity of a scenic vista, the proposed project would have no substantial adverse effect on scenic vistas, and Mitigation Measure AES-1 from the PEIR would not be applicable. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that eligible and/or designated State Scenic Highways in the County could be affected by installation of aboveground individual fiber projects located within the viewshed of the highway. The PEIR determined that, with implementation of Mitigation Measure AES-1, scenic resources would be protected, and project-specific visual impacts were determined to be reduced to a less than significant level.

Impacts from the Proposed Project

No new or substantially more severe impact. As shown on Figure 4.1-1 of the PEIR, portions of U.S. Highway 50 and State Route (SR) 89 within the County are designated as State Scenic Highways, and all of SR 49 is eligible for designation as a State Scenic Highway within the County (Caltrans 2025). The proposed project is located within the unincorporated community of Georgetown, which is located north-northeast of SR 49. The nearest segment of the proposed broadband infrastructure to SR 49 is approximately 5.1 miles to the southeast. However, no aboveground broadband infrastructure is proposed under the project. As all fiber optic lines would be underground, the project would not damage scenic resources within a State Scenic Highway and Mitigation Measure AES-1 from the El Dorado County Broadband Fiber Project PEIR would not be applicable. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AES-3: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR determined that construction and operation of individual fiber projects would not substantially degrade existing visual character or quality of public views in non-urbanized areas. The PEIR determined that the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction

Project construction is anticipated to begin in 2026 and be completed in 2027. Construction activities would occur between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on weekends. The construction methods for the project would include jack and bore, trench, plow, and missile. Staging areas would be located along roadway cross-sections. If road constraints prevent locating staging areas along roadways, alternative areas such as previously disturbed private or public land would be used. The exact locations of staging areas and equipment lay-down areas would be determined during the final construction plans.

After construction is complete, the construction and staging areas would be returned to conditions similar to those that existed prior to the construction of the project. As construction activities would be short-term and temporary, construction of the proposed project would not permanently or substantially degrade the existing visual character or quality of public views within the project area.

Operation

The proposed broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. No aboveground broadband infrastructure is proposed under the project. As the installation of fiber optic lines in buried conduits would be underground and not visible, the project would not substantially degrade the existing visual character or quality of public views of the area.

Impact Conclusion

Implementation of the proposed project would not substantially degrade the existing visual character or quality of public views of the area. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that light and glare impacts from short-term construction activities and long-term operational activities would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction

Construction activities for the proposed project would occur between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 8:00 a.m. and 5:00 p.m. on weekends. In the event that construction lighting becomes a nuisance to surrounding uses, the County would ensure construction-related lighting would be oriented away from adjacent residential areas, if necessary, and consist of the minimal wattage necessary to provide safety at the construction site.

Operation

The proposed project would not introduce new light sources. Security lighting may be used; however, all lighting would be minimal and downward facing to prevent light spillovers and glare. No reflective surfaces that could cause glare would be used for the proposed broadband infrastructure.

Impact Conclusion

Implementation of the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber PEIR

No new or substantially more severe impacts related to aesthetics would occur compared to what was evaluated in the PEIR. The following mitigation measure is the only aesthetics MM from the PEIR and is not applicable to the proposed project:

- **MM AES-1** requires a VIA 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. This measure does not apply as the project does not propose any aboveground infrastructure nor is it within the viewshed of a designated scenic vista, eligible State Scenic highway, or designated State Scenic Highway.

II. AGRICULTURE AND FORESTRY RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact AG-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	LTS	Impact AG-1, pp. 4.2-10 – 4.2-11	Yes	N/A	LTS	No
Impact AG-2: Conflict with existing zoning for agricultural use, or a Williamson Act contract?	LTS	Impact AG-2, pp. 4.2-11	Yes	N/A	LTS	No
Impact AG-3: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	LTS	Impact AG-3, pp. 4.2-11 – 4.2-12	Yes	N/A	LTS	No
Impact AG-4: Result in the loss of forest land or conversion of forest land to non-forest use?	LTS	Impact AG-4, pp. 4.2-12	Yes	N/A	LTS	No
Impact AG-5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non- forest use?	LTS	Impact AG-5, pp. 4.2-12	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Agriculture and Forestry Resources Impacts: Would the project result in other impacts to agriculture and forestry that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact AG-1: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to

the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects would be primarily located within previously disturbed and/or developed areas, the El Dorado County Broadband Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. The PEIR determined that the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. While a majority of the land adjacent to the proposed broadband infrastructure alignment is mapped as Urban and Built-Up Land, Grazing Land, Farmland of Local Importance, and Other Land, a small portion adjacent to the proposed broadband infrastructure alignment along Spanish Dry Diggins Road is mapped as Unique Farmland. However, as the proposed project would be primarily located within previously disturbed ROW and road corridors and within existing easements, the installation of underground broadband infrastructure would not interfere with the continuation of existing aboveground uses after construction is completed. As such, the project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AG-2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR determined that, as individual fiber projects would be primarily located within previously disturbed and/or developed areas, the El Dorado County Broadband Fiber Project would not conflict with existing zoning for agricultural use or with a Williamson Act contract, and the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Areas adjacent to the proposed broadband infrastructure alignment could potentially include small strips or plots of land that are zoned for agricultural use or under a Williamson Act contract. However, as the proposed project would be primarily located within previously disturbed ROW and road corridors and within existing easements, the project would not conflict with existing zoning for agricultural use or with a Williamson Act contract. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AG-3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects would be primarily located within previously disturbed and/or developed areas, the El Dorado County Broadband Fiber Project would not conflict with existing zoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The majority of the eastern portion of the County includes land within the Eldorado National Forest, Tahoe National Forest, or private timberland. However, the proposed project is located on the western slope of the County. As the proposed project would be primarily located within previously disturbed ROW and road corridors and within existing easements, the project would not conflict with existing zoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AG-4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the El Dorado County Broadband Fiber Project would not result in the loss of forest land or conversion of forest land to non-forest uses, and the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed underground broadband infrastructure would be located within previously disturbed ROW and road corridors and within existing easements. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AG-5: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects would be primarily located within previously disturbed and/or developed areas, the El Dorado County Broadband Fiber Project would not convert agricultural or forest land to non-agricultural or non-forest uses. The impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. As discussed in Impacts AG-1 through AG-4, the installation of underground broadband infrastructure would not interfere with the continuation of existing aboveground uses after construction is completed. It is anticipated that the project, including construction staging and equipment lay-down areas, would not be sited on lands that are currently in agricultural production by the respective landowners. As the proposed project would be primarily located within previously disturbed ROW and road corridors and within existing easements, the project would not convert agricultural or forest land to non-agricultural or non-forest uses. Therefore, the impact would be less than significant as the proposed project would not result in a *new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project PEIR

No new or substantially more severe impacts related to agriculture and forestry resources would occur compared to what was evaluated in the PEIR. No mitigation measures related to agriculture and forestry resources were included in the PEIR.

III. AIR QUALITY

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan?	LTS	Impact AQ-1, pp. 4.3-16	Yes	N/A	LTS	No
Impact AQ-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	LTSM	Impact AQ-2, pp. 4.3-16 – 4.3-18	Yes	MM AQ-1	LTSM	No
Impact AQ-3: Expose sensitive receptors to substantial pollutant concentrations?	LTSM	Impact AQ-3, pp. 4.3-18 – 4.3-20	Yes	MM AQ-2	LTSM	No
Impact AQ-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	Impact AQ-4, pp. 4.3-20	Yes	N/A	LTS	No

[1]LTS = Less than significant impact. LTSM = Less than significant impact with mitigation.
[2]N/A = not applicable; there are no MMs identified in the PEIR for this impact. None = there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Air Quality Impacts: Would the project result in other impacts to air quality that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the El Dorado County Broadband Fiber Project's construction and operational-generated emissions of reactive organic gases (ROG), nitrogen oxides (NO_X), course particulate matter, 10 micrometers or less in diameter (PM_{10}), and fine particulate matter, 2.5 micrometers or less in diameter ($PM_{2.5}$) would not exceed El Dorado County Air Quality Management District (EDCAQMD) and Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds. The PEIR determined that the El Dorado County Broadband Fiber Project would not conflict with or obstruct the implementation of the applicable air quality plans, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The applicable air quality plan is the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan, developed by the air districts in the Sacramento region to bring the region into attainment for the ozone National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The plan is a joint project between SMAQMD, EDCAQMD, and three other air districts in the Sacramento region (SMAQMD 2017). The plan includes the western portion of El Dorado County and, thus, the proposed project area.

EDCAQMD and SMAQMD have established thresholds of significance for a project's criteria pollutant and precursor emissions for both temporary construction-related emissions and long-term operational related emissions. These significance thresholds have been established to assist lead agencies in determining whether a project may have a significant air quality impact. A project with emissions lower than the thresholds would not conflict with or obstruct the implementation of the districts' air quality plans for the attainment of the applicable NAAQS and CAAQS.

As discussed in Impact AQ-2 below, the project's construction and operational-generated emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ would not exceed EDCAQMD and SMAQMD thresholds. Therefore, the project would not conflict with or obstruct the implementation of the applicable air quality plans. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AQ-2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that daily construction emissions for each individual construction method would be significantly less than EDCAQMD and SMAQMD daily thresholds. According to 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 BMPs included in Appendix C-1, Tables C.4 and C.5 of the EDCAQMD Guide to Air Quality Assessment (EDCAQMD 2002). With implementation of Mitigation Measure AQ-1, impacts related to construction emissions were determined to be less than significant.

Additionally, the operation of the individual fiber projects under the El Dorado County Broadband Fiber Project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. An emergency backup generator may be used in the event of a power outage or for routine testing. Monthly routine testing is assumed to last 15 minutes per testing event. As use of the emergency backup generator would be limited, individual fiber projects would produce minimal operational emissions. Impacts related to operational emissions were determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction Emissions

As outlined in Section 4.3, Air Quality, of the PEIR, the project's temporary construction emissions were estimated using the California Emissions Estimator Model (CalEEMod). The PEIR assumed that it was 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 was also assumed that no more than 10 individual fiber project construction sites would be active at one time. As the proposed project would be consistent with the construction assumptions in the PEIR, the proposed project's daily construction emissions would be significantly less than EDCAQMD and SMAQMD daily construction thresholds and would not violate any air quality standard or result in a considerable net increase of any criteria pollutant. As the project would include grading during construction, an FDCP would be required. Mitigation Measure AQ-1 would be implemented, which requires the preparation of an FDCP and implementation of all construction BMPs included in Appendix C-1, Tables C.4 and C.5 of the EDCAQMD Guide to Air Quality Assessment (EDCAQMD 2002).

Operational Emissions

Operation of the project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. An emergency backup generator may be used at some of the individual fiber sites in the event of a power outage or for routine testing. Monthly routine testing is assumed to last 15 minutes per testing event. As routine use of the backup generators would be limited, the projects would produce minimal operational emissions. Therefore, the project's operational emissions would not violate any air quality standard or result in a considerable net increase in any criteria pollutant.

Impact Conclusion

The proposed project's daily construction emissions would be less than EDCAQMD and SMAQMD daily construction thresholds. As the project would include grading during construction, an FDCP would be required. Mitigation Measure AQ-1 would be implemented, which requires the preparation of an FDCP and implementation of all construction BMPs included in Appendix C-1, Tables C.4 and C.5 of the EDCAQMD Guide to Air Quality Assessment (EDCAQMD 2002).

Additionally, operation of the project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. An emergency backup generator may be used at some of the individual fiber sites in the event of a power outage or for routine testing. Monthly routine testing is assumed to last 15 minutes at one time. As routine use of the backup generators would be limited, the projects would produce minimal operational emissions. Therefore, with implementation of Mitigation Measure AQ-1, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AQ-3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that the project would not result in an increase in traffic on the local roadways within the County such that it would impact on the efficiency of roadways and/or intersections. As the El Dorado County Broadband Fiber Project was determined to not

create congestion or delay, there would be no circumstances in which carbon monoxide (CO) hotspots would occur. Therefore, the impact was determined be less than significant. Additionally, the PEIR concluded that considering the highly dispersive nature of diesel particulate matter (DPM), and the fact that construction activities at any single location would be short-term and temporary, it is not anticipated that construction of the El Dorado County Broadband Fiber Project would expose sensitive receptors to substantial DPM concentrations. Therefore, the PEIR concluded that individual fiber projects would not result in the exposure to elevated pollutant levels from vehicular exhaust, and the impact would be less than significant.

The PEIR concluded that individual fiber projects under the El Dorado County Broadband Fiber Project may be located within designated Naturally Occurring Asbestos (NOA) review area on the El Dorado County Asbestos Review Area Map (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"). As outlined in Mitigation Measure AQ-2, prior to construction, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer if any portion of the disturbed project area is within a designated NOA review area on the El Dorado County Asbestos Review Area Map; however, an exemption to this requirement may apply 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. Additionally, if, prior to construction and during construction, regardless of the area designation on the El Dorado County Asbestos Review Area Map, and regardless of any previously granted exemption, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer if any portion of the individual project area to be disturbed has NOA.

As individual fiber projects under the El Dorado County Broadband Fiber Project may be located within designated NOA review area on the El Dorado County Asbestos Review Area Map, preparation of an Asbestos Dust Mitigation Plan, as outlined in Mitigation Measure AQ-2, would be required. With implementation of Mitigation Measure AQ-2, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Impacts to sensitive receptors are typically analyzed for CO hot spots and exposure to toxic air contaminants (TACs). An analysis of the proposed project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found near congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increases. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections. Because CO disperses rapidly, hot spots are most likely to occur in areas with limited vertical mixing such as tunnels, long underpasses, or below-grade roadways.

The project would not result in an increase in traffic on the local roadways within the County such that it would impact on the efficiency of roadways and/or intersections. As the project would not create congestion or delay, there would be no circumstances in which CO hotspots would occur.

Other Localized Pollutants

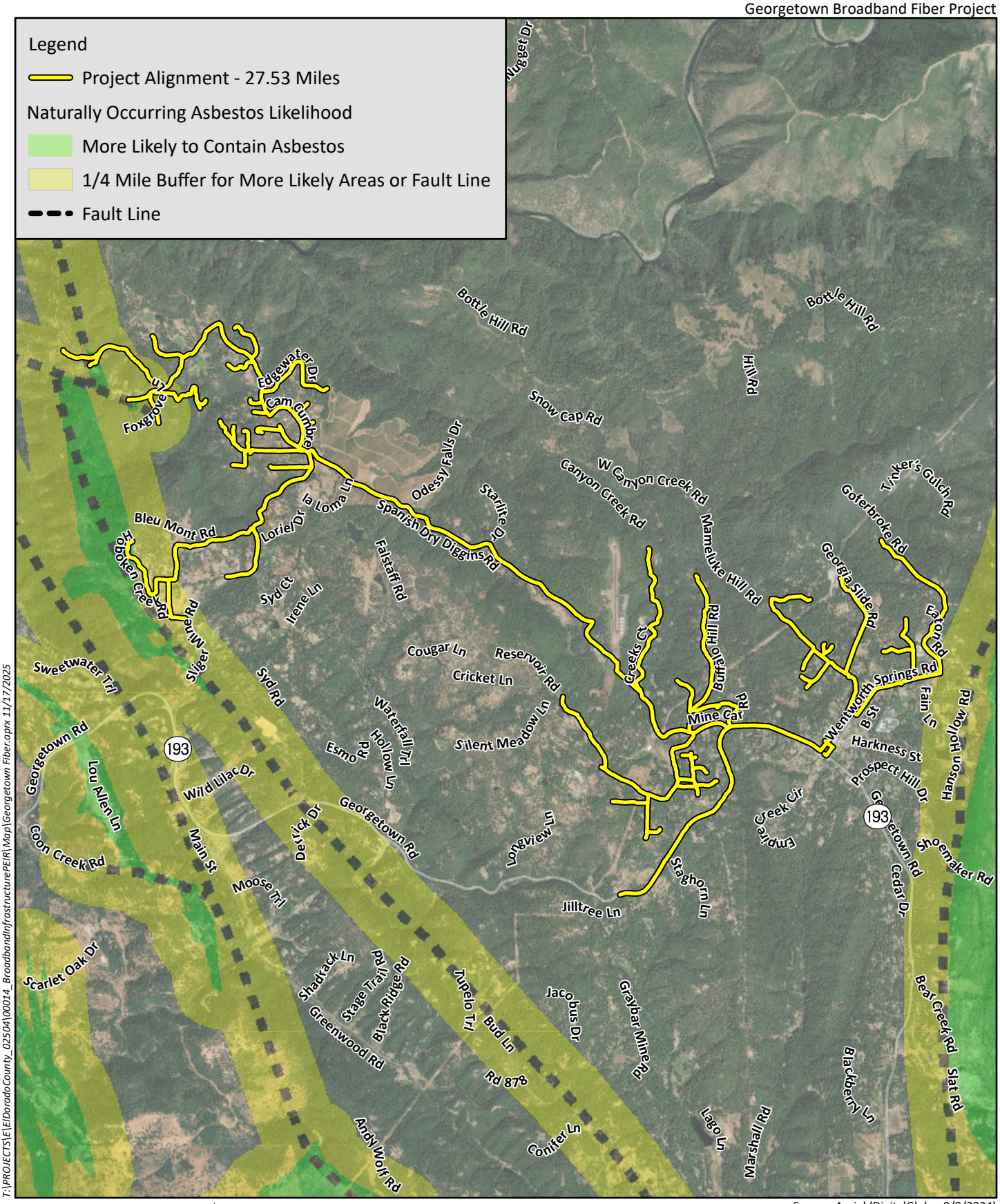
The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from Office of Environmental Health Hazard Assessment [OEHHA]) and are best suited for evaluation of long duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). In addition, concentrations of mobile source DPM emissions disperse rapidly and are typically reduced by 70 percent at approximately 500-feet (CARB 2005). Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would be short-term and temporary, it is not anticipated that construction of the project would expose sensitive receptors to substantial DPM concentrations. Therefore, the proposed project would not result in the exposure to elevated pollutant levels from vehicular exhaust.

Asbestos dust is a known carcinogen and is classified as a TAC by the California Air Resources Board (CARB). Some areas of the County area are known to contain NOA. Additionally, as shown in Figure 3, Asbestos Map, portions of the proposed project alignment are located in areas likely to contain NOA. However, as outlined in Mitigation Measure AQ-2, 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, if, prior to and during construction, 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 would be submitted to the Air Pollution Control Officer. Therefore, as NOA may be discovered prior to and during construction of the proposed project, Mitigation Measure AQ-2 would be implemented.

Impact Conclusion

The project would not result in an increase in traffic on the local roadways within the County such that it would impact on the efficiency of roadways and/or intersections. As the project would not create congestion or delay, there would be no circumstances in which CO hotspots would occur. Due to the highly dispersive nature of DPM, and the fact that construction activities would be short-term and temporary, it is not anticipated that construction of the project would expose sensitive receptors to substantial DPM concentrations. Therefore, the proposed project would not result in the exposure to elevated pollutant levels from vehicular exhaust.

As outlined in Mitigation Measure AQ-2, 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, if, prior to and during construction, the owner/operator, a professional geologist, or the Air



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0 4,500 Feet

Source: Aerial (DigitalGlobe, 9/9/2024)

HELIX Environmental Planning

Asbestos Map

Figure 3

Pollution Control Officer determines that any portion of the individual fiber project area to be disturbed has NOA, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer. As NOA may be discovered prior to and during construction of the proposed project, Mitigation Measure AQ-2 would be implemented.

Therefore, with implementation of Mitigation Measure AQ-2, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact AQ-4: Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that construction and operation of the El Dorado County Broadband Fiber Project would not result in emissions of odors adversely affecting a substantial number of people. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Common sources of odors include wastewater treatment plants, landfills, transfer stations, composting facilities, refineries, chemical plants, and food processing plants (EDCAQMD 2002).

Construction of the project may require the use of diesel-powered equipment. Diesel exhaust can be a temporary source of odors. Due to the temporary and intermittent nature of the proposed construction methods, construction of the project would not result in emissions leading to odors that would adversely affect substantial numbers of people. Broadband infrastructure is not considered to be a typical significant source of objectionable odors. Therefore, the project would not result in emissions leading to odors that would adversely affect substantial numbers of people. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the El Dorado County Broadband Fiber Project PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project PEIR

With implementation of Mitigation Measures AQ-1 and AQ-2 from the PEIR, no new or substantially more severe impacts related to air quality would occur compared to what was evaluated in the PEIR. All air quality mitigation measures from the PEIR are applicable to the proposed project and are presented below.

MM AQ-1: 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 FDCP.

MM AQ-2: 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.

IV. BIOLOGICAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact BIO-1: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?	LTSM	Impact BIO-1, pp. 4.4-22 – 4.4-23	Yes	BIO-2, BIO-3, BIO-4, BIO-6, BIO-7	LTSM	No
Impact BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?	LTSM	Impact BIO-2, pp. 4.4-23 – 4.4-24	Yes	BIO-9, BIO-10	LTSM	No
Impact BIO-3: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTSM	Impact BIO-3, pp. 4.4-24 – 4.4-25	Yes	BIO-9	LTSM	No
Impact BIO-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?	LTSM	Impact BIO-4, pp. 4.4-24 – 4.4-25	Yes	BIO-2, BIO-4, BIO-6, BIO-9	LTSM	No
Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTSM	Impact BIO-5, pp. 4.4-25	Yes	BIO-10	LTSM	No
Impact BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	NI	Impact BIO-6, pp. 4.4-25	Yes	N/A	LTSM	No

[1]LTSM = Less than significant impact with mitigation. NI = No impact.

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

New Biological Resources Impacts: Would the project result in other impacts to biological resources that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion

Impact BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that as the work associated with the individual fiber projects would be primarily located within previously disturbed and/or developed areas, it is unlikely that the El Dorado County Broadband Fiber Project would result in substantial adverse effect on special-status species or their associated habitats, including USFWS designated critical habitat and/or NMFS essential fish habitat. The PEIR determined that with the implementation of MM BIO-1, BIO-2, BIO-3, BIO-4, BIO-6, BIO-7, and BIO-8, the El Dorado County Broadband Fiber Project would have a less than significant impact on biological resources.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. Since direct impact to special-status species such as, harm, entrapment, or mortality may result from construction activities including vegetation removal, trenching, and equipment utilization and staging, HELIX biologists conducted a desktop review and opportunistic biological reconnaissance survey on October 31, 2025, to fulfill the requirement of MM BIO-1, which requires a project-specific biological resources analysis, and identify applicable measures from the PEIR to mitigate impacts on special-status species. As part of the desktop survey, the California Natural Diversity Data Base (CNDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants, and U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) databases were reviewed in October 2025 to identify known biological resources in the project site and vicinity. Results of these database queries are included as Appendix B, Database Queries, to this document.

As a result of the desktop review and survey completed to fulfill MM BIO-1, it was determined that the proposed project site crosses and runs directly adjacent to potential habitat for two special-status plants: Brownish beaked-rush (*Rhynchospora capitellata*) and Layne's ragwort (*Packera layneae*); and five special-status wildlife species: California red-legged frog (*Rana draytonii*), foothill yellow-legged frog- north and south Sierra DPS (*Rana boylii pop. 3 & 5*), northwestern pond turtle (*Actinemys marmorata*), and pallid bat (*Antrozous pallidus*) that may be impacted as a result of project implementation. Site surveys and desktop review have shown that there is no potential for the coast horned lizard (*Phrynosoma blainvilli*) or fisher (*Pekania pennanti*), both state species of special concern, to occur within the project site so Mitigation Measure BIO-5 and BIO-8 would not apply to the proposed project. Mitigation Measures BIO-2, BIO-3, BIO-4, BIO-6, and BIO-7 from the PEIR contain measures requiring preconstruction surveys and worker trainings to avoid take of special-status species prior to

construction commencement. These measures also include conditions to install wildlife exclusion fencing and require the stationing of a biological monitor to ensure that species are not impacted throughout project construction.

In conclusion, MMs BIO-2, BIO-3, BIO-4, BIO-6, and BIO-7 would apply to the proposed Georgetown Broadband Project. With implementation of Mitigation Measures BIO-2, BIO-3, BIO-4, BIO-6, and BIO-7, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that as the work associated with the individual fiber projects would be primarily located within previously disturbed and/or developed areas, it is unlikely that the Project would result in substantial adverse effect on riparian habitat or other sensitive natural communities. MM BIO-1 contains measures intended to identify the potential for presence of any sensitive natural communities that may be present within the proposed project site and allow for the specification of additional mitigation measures that include actions such as designed avoidance and formal permitting with regulating agencies where impacts shall be mitigated to agency requirements. Mitigation Measures BIO-9 and BIO-10 contains measures that require proper permitting with the appropriate state and federal agencies for the impacts to jurisdictional wetlands and waters and riparian habitat (BIO-9) and of any protected oak resources or regulated individual oak trees (BIO-10) that will be removed resulting from the project and cannot be avoided. With the implementation of MMs BIO-1, BIO-9, and BIO-10, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. The construction of new underground infrastructure through sensitive natural communities with activities such as trenching, grading and drilling may significantly impact sensitive natural communities through the direct loss of habitat and species composition.

As a result of the desktop review and survey completed to fulfill MM BIO-1, it was determined that the proposed project site crosses and runs directly adjacent to sensitive riparian and wetland habitats that are state and federally protected as well as oak woodlands protected through local ordinances. MMs BIO-9 and BIO-10 from the PEIR would be implemented which contain measures for the appropriate permitting with local, state, and federal agencies to determine the appropriate compensatory mitigation of impacts to these sensitive communities. With implementation of MMs BIO-9 and BIO-10, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact BIO-3: Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that as the work would be associated with the individual fiber projects would be primarily located within previously disturbed and/or developed areas it is unlikely that the Project would result in substantial adverse effect on state or federally protected wetlands. With the implementation of MMs BIO-1 and BIO-9, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. The construction of new underground infrastructure through state or federally protected wetlands with activities such as trenching, grading and drilling may significantly impact jurisdictional wetlands through direct removal, filling, and/or hydrological interruption.

As a result of the desktop review and survey completed to fulfill MM BIO-1, it was determined that the proposed project site crosses and runs directly adjacent to perennial, intermittent, and ephemeral streams as well as seasonal wetlands that are protected by state and federal regulations. Mitigation Measure BIO-9 from the PEIR would be implemented which contains measures for the appropriate permitting with local, state, and federal agencies to determine the appropriate compensatory mitigation of impacts to these jurisdictional resources. With implementation of MM BIO-9, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that as the work would be associated with the individual fiber projects would be primarily located within previously disturbed and/or developed areas it is unlikely that the Project would result in substantial adverse effects on the movement of wildlife or interfere with the functionality of wildlife corridors. The PEIR determined that with the implementation of MM BIO-1, BIO-2, BIO-4, BIO-6, and BIO-9, the El Dorado County Broadband Fiber Project would have a less than significant impact on wildlife corridors.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and

within existing easements. All underground fiber optic lines would be new, proposed infrastructure. Impacts to biological communities encountered during project construction may qualify as significant under CEQA as these impacts may impede the free movement of wildlife through the Proposed Project site.

As a result of the desktop review and survey completed to fulfill MM BIO-1, it was determined that the proposed project site crosses and runs directly adjacent to aquatic and riparian corridors that may facilitate the movement of aquatic and terrestrial species as well as suitable nesting habitat for listed and non-listed migratory bird species. Mitigation Measures BIO-2, BIO-4, BIO-6, and BIO-9 from the PEIR would be implemented which contain measures to conduct preconstruction surveys and worker trainings to avoid take of special-status species. These measures also include conditions such as installing wildlife exclusion fencing and stationing a biological monitor to ensure that species are not directly entrapped, harmed, or killed during construction of the project. With implementation of Mitigation Measures BIO-2, BIO-4, BIO-6, and BIO-9, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that as the work would be associated with the individual fiber projects would be primarily located within previously disturbed and/or developed areas it is unlikely that the Project would result in substantial adverse effects on oak resources and individually regulated oak trees. With the implementation of MM BIO-1 and BIO-10, the El Dorado County Broadband Fiber Project would have a less than significant to local policies and ordinances protecting biological resources.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. The construction of new underground infrastructure through oak woodland and associated communities with activities such as trenching, grading and drilling may significantly impact these resources through individual tree damage or loss, as well as the greater accumulated impact to overall canopy and habitat composition.

As a result of the desktop review and survey completed to fulfill MM BIO-1, it was determined that the proposed project site crosses and runs directly adjacent to oak woodland habitat where construction activities may impact oak woodland canopy cover or result in the direct removal or impact to oak trees. Mitigation Measure BIO-10 from the PEIR would be implemented which contain measures for the appropriate permitting with local and state agencies to determine the appropriate compensatory mitigation of impacts to individual oak trees that will be removed or for impacts to oak woodland canopy. With implementation of Mitigation Measure BIO-10, the impact would be less than significant, and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Impacts from the El Dorado County Broadband Fiber Project PEIR

No impact. The PEIR determined that, as the El Dorado County Broadband Fiber Project would not conflict with provisions of adopted Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plans, no impact would occur.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the communities of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. The project would not conflict with provisions of adopted Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plans. No impact would occur, and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project PEIR

With the completion of Mitigation Measure BIO-1, and the implementation of Mitigation Measures BIO-2, BIO-3, BIO-4, BIO-6, BIO-7, BIO-9, and BIO-10, no new or substantially more severe impacts related to biological resource would occur compared to what was evaluated in the PEIR.

The following MM from the PEIR has been satisfied in the analysis of the projects impacts on the Project Site:

BIO-1: 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 the Biological Resources Section 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.

The following MMs from the PEIR are not applicable for the proposed project:

BIO-5: 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

BIO-8: 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 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.

The following MMs from the PEIR are applicable to the proposed project and are provided below.

BIO-2: 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.

BIO-3: 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.

BIO-4: 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.

BIO-6: 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 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 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.

BIO-7: 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 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 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 area.

BIO-9: If it is determined that impacts to jurisdictional waters or other sensitive natural communities cannot be avoided, then the applicant of an individual fiber project shall apply for any necessary permits from the United States Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), and the Regional Water Quality Control Board (RWQCB) (e.g., Section 401/404 permits, CDFW Lake or Streambed Alteration Agreement, etc.) prior to approval. If necessary, a formal delineation of wetlands and "other waters" of the U.S. shall be prepared in accordance with 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.

BIO-10: If it is determined during the biological resources assessment that an individual fiber project will result in impacts to oak resources, depending on the location of an individual fiber project, the County, incorporated cities, or the Tahoe Regional Planning Agency (TRPA) may require mitigation for impacts to oak resources or regulated individual oak trees. Depending on the location of the individual fiber project, the County Community Planning and Building Department, City of Placerville Planning

Division, City of South Lake Tahoe Planning Division, or TRPA may require an inventory of prematurely removed trees or canopy cover to determine the extent of the loss prior to approval of the individual fiber project. 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 County Community Planning and Building Department, City of Placerville Planning Division, City of South Lake Tahoe Planning Division, or TRPA. Resource professionals may include botanists, ecologists, wildlife biologists, and foresters.

V. CULTURAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	LTS	Impact CUL-1, pp. 4.5-18	Yes	N/A	LTS	No
Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	LTSM	Impact CUL-2, pp. 4.5-18 – 4.5-20	Yes	None	LTS	No
Impact CUL-3: Cause a substantial adverse change in the significance of archaeological cultural resources that are accidentally discovered during project construction?	LTSM	Impact CUL-3, pp. 4.5-20 – 4.5-21	Yes	MM CUL-2	LTSM	No
Impact CUL-4: Disturb any human remains, including those interred outside of formal cemeteries?	LTS	Impact CUL-4, pp. 4.5-21	Yes	N/A	LTS	No

[1]LTS = Less than significant impact. LTSM = Less than significant impact with mitigation.
[2]N/A = not applicable; there are no MMs identified in the PEIR for this impact. None = there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Cultural Resource Impacts: Would the project result in other impacts to cultural resources that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

METHODOLOGY

CHRIS Records Search

Records Search Methods

On October 27, 2025, staff at the North Central Information Center (NCIC) at California State University, Sacramento, conducted a California Historical Resources Information System (CHRIS) records search for the project's Area of Direct Impact (ADI; generally a 20-foot buffer on either side of each road segment) and a 1/8-mile radius. The 1/8-mile search radius was determined to be adequate for the proposed project given its linear footprint. The goals of the records search were to (1) identify precontact and historic-era resources within the search radius; (2) determine which portions of the ADI have been previously studied; and (3) ascertain the potential for cultural resources and human remains to occur within the ADI. The search included a review of USGS archaeological site location maps, resource records, and data from previous studies.

Records Search Results

The records searches determined that 41 cultural resources, including 36 historic-era resources, four precontact resources, and one multicomponent resource have been previously documented within 1/8-mile of the ADI. Of these, seven resources intersect or are immediately adjacent to the ADI; these include the segments of the Georgetown Ditch, segments of the Taylor Mine Ditch, segments of the Georgetown Divide Public Utility District (GDPUD) ditch, Sliger Mine Road, an unnamed mining site, an unnamed ditch, and a lithic scatter.

Archaeological Desktop Analysis

A desktop analysis of the records search data was conducted to determine the overall archaeological sensitivity and appropriate survey intensity for each of the 165 road segments within the ADI.

All road segments associated with the project were divided into three categories based on the type of pedestrian survey they required: No Survey, Survey Sites Only, and Full Survey. These categories are described below.

- Full Survey (152 segments): These road segments required intensive pedestrian surveys along their entire lengths. Full survey was required because these roads have not been surveyed at all, have only been partially surveyed, were surveyed more than five years ago, and/or intersected areas where the potential for encountering undocumented archaeological resources is relatively high (e.g., along perennial or major seasonal drainages, near ecotones, or in areas showing historic-era land modifications from mining or logging).

- Site Survey Only (9 segments): These road segments had been surveyed within the last five years, but are near documented archaeological resources, and therefore, the survey effort focused on relocating and inspecting those resources to confirm that their boundaries and descriptions were consistent with data provided during the CHRIS records search.

- No Survey (4 segments): These road segments did not require pedestrian surveys. All of these segments were surveyed within the last five years, and none are adjacent to known cultural resources.

Archaeological Field Survey

Survey Methods

From April 6, 2026, through April 10, 2026, HELIX Staff Archaeologist Leah Wargo, Registered Professional Archaeologist (RPA) surveyed the ADI under the direction of HELIX Senior Cultural Resources Project Manager II Clarus Backes, RPA. The survey involved the systematic investigation of the ADI based on the road categories defined above.

All roads designated as *No Survey* were driven and given a “windshield survey” to confirm that no areas with high archaeological sensitivity had been missed by the records searches. For all roads designated as *Site Survey Only*, the archaeologists attempted to locate previously documented cultural resources. When these resources were found, the archaeologists confirmed that the resource’s description and

boundaries were accurately represented in the data provided during the CHRIS records searches. Field notes and GIS data were updated if conditions in the field did not match the CHRIS documentation.

On roads designated as *Full Survey*, the ground surface was examined for artifacts (e.g., flaked stone tools, tool making debris, stone milling tools, fire-affected rock, precontact ceramics), soil discoloration that might indicate the presence of a precontact cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations, wells) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as gopher holes, burrows, cut banks, and drainage banks were also visually inspected.

Survey Results

Ground visibility during the survey was variable due to the wide range of environmental settings within the project area. However, visibility within the ADI (a 20-foot buffer on either side of each drivable road surface) was generally sufficient to determine whether cultural resources were present. Surveys of some roads were limited because they are bordered by fences within the 20-foot buffer, but these surveys are still considered adequate because fences would not be removed to implement the project. Some roads are also bordered by shallow drainage ditches to prevent flooding during heavy rain, but these ditches were not considered cultural resources unless they were known to represent a historic-era ditch or canal.

Whenever possible, the archaeologists relocated previously documented cultural resources and confirmed that their location and condition are accurately represented in the existing site documentation. The archaeologists also inspected the roadside for previously undocumented resources, paying particular attention to areas that are relatively sensitive for cultural materials (e.g., near seasonal drainages or ecotones, in areas known to have had historic-era mining or logging activity, and in areas near previously documented resources).

Of the 165 road segments addressed during the survey, 161 were fully or partially surveyed, four were not surveyed because they have been fully inspected within the last five years and are not adjacent to known cultural resources. In addition, 30 segments or portions of segments that were included in the 161 fully or partially surveyed segments above could not be surveyed because locked gates or property owners' communications prohibited access. These include:

- The northern portion of Segment D000039 (Goferbroke Road).
- Segment D000007 (the northern portion of Tiger Lane as it approaches Verdugo Lane).
- The western portion of Segment D000009 (outdated alignment of Tiger Lane).
- A 630-foot-long portion of Segment D000022 (Mine Car Road) extending west from Quartz Lane.
- The northern portion of Segments D000023 and D000035 (Oregon Trail Road).
- Segment D000025 (Tobacco Road).
- Segment D000030 (Morgan Ranch Loop).

- The southern portion of Segment D000090 (Halloway Drive).
- The northern portion of Segment D000093 (Canyon Creek Road).
- A cluster of connected segments that include the northern portion of Segment D000104 (Camino Cumbre), Segment D000112 (Via Descanso), the southern portion of Segment D000114 (Camino Cumbre), and Segment D000118 (Paseo Pinar).
- The western portion of Segment D000116 (Bandtail Road).
- The northern portion of Segment D000127 (Falling Star Lane).
- The western portion of Segment D000129 (Slate Court).
- The northern portion of Segment D000130 (Roquero Cerro Road).
- The eastern portion of Segment D000145 (Edgewater Drive).
- A cluster of connected segments that include the western portion of Segment D000148 (Bleu Mont Road and English Lane); Segment D000157 (English Lane and Hoboken Creek Road); and Segments D0000159, D0000160, D0000161, D0000167, D0000168, and D0000169 (Hoboken Creek Road).
- The northern portion of Segment D000166 (Mimosa Lane).
- The southern portion of Segment D000174 (Loka Lane) and Segment D000180 (unnamed road branching from Loka Lane).

Newly Discovered Resources

Two previously undocumented resources were found during the survey. Resource GT-0408-01 appears to be an abandoned logging skid road or ditch extending northwest from Segment D000082 (Canyon Creek Road) for approximately 80 feet. Approximately 20 feet in width, GT-0408-01 is bound by earthen berms that uniformly project approximately 10 feet from the bottom of the feature, and had no observable, associated cultural elements nearby. Historic-era aerial photographs reveal that this feature has been extant since 1958 and currently leads to a residence which was constructed in 2013 (Netronline 2026). GT-0408-01 resembles the remains of either a logging skid road or a water conveyance feature associated with historic-era gold mining efforts that were prevalent throughout El Dorado County in the nineteenth to mid-twentieth centuries.

Resource GT-0408-02 appears to be an abandoned ditch or logging skid trail parallel to and on the west side of Segment D000077 (Reservoir Road) for approximately 122 feet. It varies between five and ten feet in width, is approximately one foot deep, and sits atop a berm that stands two to three feet above the main roadway. It is currently in poor condition, covered in pine duff and becoming densely overgrown with young pine, cedar, and manzanita trees. GT-0408-02 is visible in its current location in a historic-era aerial photograph from 1958 (Netronline 2026), however, its function cannot be determined given its current condition.

Discussion

Impact CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The El Dorado County Broadband Fiber Project PEIR concluded that because unique archaeological 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 unique archaeological resource impact scenarios, would seek to avoid impacts to such resources if feasible, and would mitigate those impacts that cannot be avoided through design. Avoidance is the preferred method of mitigation under CEQA (CEQA Guidelines Section 15370), and ideally archaeological resources that have been determined to meet the criteria of unique archaeological resources 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 Measures CUL-1, the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. Mitigation Measure CUL-1 from the El Dorado County Broadband Fiber Project PEIR requires a pedestrian field survey for areas of native, unpaved soil that have not been adequately surveyed. To fullfill the requirement of Mitigation Measure CUL-1 from the PEIR, a CHRIS records searches for the project's ADI was completed. The records searches determined that 41 cultural resources, including 36 historic-era resources, four precontact resources, and one multicomponent resource, have been previously documented within 1/8-mile of the ADI.

Additionally, a pedestrian survey was completed for the 165 road segments. Two previously undocumented resources were found during the survey. Resource GT-0408-01 is an 80-foot-long abandoned logging skid road or ditch extending northwest from Segment D000082 (Canyon Creek Road). Resource GT-0408-02 is an abandoned trail segment or ditch running parallel to and on the west side of Segment D000077 (Reservoir Road).

As a cultural records search and a pedestrian survey were completed, Mitigation Measure CUL-1 from the PEIR has been satisfied. Therefore, the impact would be less than significant as it would not result in a *new or substantially more severe impact* compared to what was evaluated in the PEIR for Impacts CUL-1 and CUL-2.

Impact CUL-3: Would the project cause a substantial adverse change in the significance of archaeological cultural resources that are accidentally discovered during project construction?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The El Dorado County Broadband Fiber Project PEIR concluded that because archaeological cultural resources that qualify as historical resources or as unique archaeological 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.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. Archaeological resources encountered during project construction may qualify as historical resources or unique archaeological resources for their ability to contain historically important information, or for their value to descendant communities as expressions of their cultural heritage and patrimony. Mitigation Measure CUL-2 from the El Dorado County Broadband Fiber Project PEIR would be implemented which contains measures for the inadvertent discovery of archaeological resources during ground-disturbing activities.

Table 1, Segment-Specific Impact Avoidance Strategies, details impact avoidance strategies that would act as conditions of approval for the proposed project on thirteen road segments with unusually high sensitivity for cultural resources. All of the segments listed in Table 1 would require archaeological construction monitoring that is supervised by a consulting archaeologist who meets the *Secretary of the Interior's Professional Qualifications Standards* for archaeology.

Table 1: Segment-Specific Impact Avoidance Strategies

Segment #	Road Name	Monitoring Length (ft)	Monitoring Length (mi)	Impact Avoidance Strategy
D000001	Wentworth Springs Rd	250	0.05	Monitor northern 250 feet of segment.

Segment #	Road Name	Monitoring Length (ft)	Monitoring Length (mi)	Impact Avoidance Strategy
D000002	Georgia Slide Rd	1932	0.37	Monitor from 300 feet southeast of intersection with Mameluke Hills Rd to intersection with School St; use only hand-held tools to remove vegetation and trench within five feet of the road at location 360 feet south of Mameluke Hills Rd.
D000012	Goferbroke Rd	1200	0.23	Monitor from Eaton Rd north for 1200 feet.
D000021	State Highway 193	3423	0.65	Monitor entire segment.
D000053	State Highway 193	750	0.14	Monitor from Graybar Mine Rd north for 750 feet; trench only in paved shoulder on south side of road and within five feet of roadway on north side of road.
D000077	Reservoir Rd	300	0.06	Monitor western 300 feet of segment.
D000082	Canyon Creek Rd	2257	0.43	Monitor entire segment.
D000132	Edgewater Dr	350	0.07	Monitor southwestern 350 feet of segment, trench only within three feet of roadway.
D000134	Edgewater Dr	100	0.02	Monitor northern 100 feet of segment.
D000142	Edgewater Dr	151	0.03	Monitor entire segment.
D000147	Sliger Mine Rd	150	0.03	Monitor northwestern 150 feet of segment, with trenching as close to pavement as possible on southwest side of road.
D000154	Sliger Mine Rd	300	0.06	Monitor between intersection with Shelter Cove Dr and northern terminus of Segment D000147.
D000162	Sliger Mine Rd	838	0.16	Monitor entire segment.
D000171	Loka Ln	150	0.03	Monitor western 150 feet of segment.
D000172	Loka Ln	223	0.04	Monitor entire segment.

In addition to these conditions of approval, with implementation of Mitigation Measure CUL-2, the impact would be less than significant as the proposed project would not result in a *new or substantially more severe impact* compared to what was evaluated in the El Dorado County Broadband Fiber Project PEIR.

Impact CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that compliance with CEQA Guidelines Section 15064.5, California Health and Safety Code Section 7050.5, and California Public Resources Code (PRC) Section 5097.9 *et seq* would avoid or substantially reduce the severity of impacts on human remains. Therefore, the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. There is the potential to encounter human remains in almost any environmental context that occurs in El Dorado County. The proposed project would be required to comply with CEQA Guidelines Section 15064.5, California Health and Safety Code Section 7050.5, and PRC Section 5097.9 *et seq.* to avoid or substantially reduce the severity of impacts on human remains. As outlined in these regulations, the severity of impacts would be reduced by minimizing additional ground disturbance in the vicinity of the remains, and by development and implementation of a plan for respectful treatment of the remains in consultation with descendant communities who place religious and cultural significance in such remains. Further mitigation measures are unnecessary because compliance with the regulations listed above would avoid or substantially reduce the severity of impacts on human remains. Therefore, the impact would be less than significant as the proposed project would not result in a *new or substantially more severe impact* compared to what was evaluated in the El Dorado County Broadband Fiber Project PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project PEIR

With implementation of Mitigation Measure CUL-2, no new or substantially more severe impacts related to cultural resources would occur compared to what was evaluated in the PEIR.

The following MM from the PEIR has been satisfied through the analysis of potential impacts on the project site:

CUL-1: 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. The Tribes would be consulted on recommendations to avoid and/or reduce the potential for project-related impacts on precontact 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 precontact and/or historic-era artifacts to determine significance pursuant to the CEQA Guidelines.
- Preparation of a report, including an evaluation of site significance, and recommendations for mitigation, if appropriate.
- Curation of collected artifacts in an accredited repository (i.e., a facility such as a museum, archeological center, laboratory, or storage facility managed by a university, college, museum, other educational or scientific institution, a Federal, State, or local Government agency or Indian tribe that can provide professional, systematic, and accountable curatorial services on a long-term basis).

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 precontact and/or historic-era artifacts through visual inspection and chemical analysis when applicable.
- Preparation of a report.
- Curation of collected artifacts in an accredited repository (i.e., a facility such as a museum, archeological center, laboratory, or storage facility managed by a university, college, museum, other educational or scientific institution, a Federal, State, or local Government agency or Indian tribe that can provide professional, systematic, and accountable curatorial services on a long-term basis).

If the resource is precontact in nature, the Phase III investigation shall be coordinated with descendant tribal communities.

The following MM from the PEIR is applicable to the proposed project and is provided below.

CUL-2: 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 collaborate with the Tribes and 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.

VI. ENERGY

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact EN-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	Impact EN-1, pp. 4.6-5 – 4.6-6	Yes	N/A	LTS	No
Impact EN-2: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	LTS	Impact EN-2, pp. 4.6-6	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Energy Impacts: Would the project result in other impacts to energy that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact EN-1: Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that construction and operation of individual fiber projects under the El Dorado County Broadband Fiber Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would not generate a substantial energy demand beyond existing conditions within the project area, but rather it seeks to improve the connectivity of the community of Georgetown through improved broadband access. Project construction may require the use of heavy-duty construction equipment. Energy would be consumed in the form of gasoline and diesel fuel to power this equipment and would be consumed in worker commute vehicles. However, this energy use would be inherently short-term and temporary.

Operation of the project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. An emergency backup generator may be used for the

project in the event of a power outage or for routine testing. Monthly routine testing is assumed to last 15 minutes per testing event. Additionally, implementation of the proposed project would expand El Dorado County's broadband network, which could ultimately result in a decrease in gasoline consumption as rural workers are provided with better telecommuting opportunities, resulting in a reduction in vehicles miles traveled (VMT) Countywide.

Therefore, implementation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact EN-2: Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects under the El Dorado County Broadband Fiber Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, the El Dorado County Broadband Fiber Project would not conflict with or obstruct a State or local plan for renewable energy efficiency. The El Dorado County Broadband Fiber Project was determined to conform to all applicable State, federal, and local laws, and codes, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. See the discussion under Impact EN-1, above. As the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, the proposed project would not conflict with or obstruct a State or local plan for renewable energy efficiency. The project would conform to all applicable State, federal, and local laws, and codes. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to energy would occur compared to what was evaluated in the PEIR. No mitigation measures related to energy resources were included in the PEIR.

VII. GEOLOGY AND SOILS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?	LTS	Impact GEO-1, pp. 4.7-12	Yes	N/A	LTS	No
Impact GEO-2: Result in substantial soil erosion or the loss of topsoil?	LTS	Impact GEO-2, pp. 4.7-12 – 4.7-13	Yes	N/A	LTS	No
Impact GEO-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in the on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	LTS	Impact GEO-3, pp. 4.7-13 – 4.7-14	Yes	N/A	LTS	No
Impact GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	LTS	Impact GEO-4, pp. 4.7-14	Yes	N/A	LTS	No
Impact GEO-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	NI	Impact GEO-5, pp. 4.7-14	Yes	N/A	NI	No
Impact GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS	Impact GEO-6, pp. 4.7-15 – 4.7.16	Yes	N/A	LTS	No

[1]LTS = Less than significant impact. NI = No impact.

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

New Geology and Soils Impacts: Would the project result in other impacts to geology and soils that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact GEO-1: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issues by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects would be located within previously disturbed and/or developed areas, the risk of localized ground failure was assumed to have already been minimized through previous grading, compaction, and use of engineered fills. Design and construction of individual fiber projects would be conducted in accordance with the California Building Code (CBC) and other applicable engineering specifications and grading regulations that would further reduce the potential for adverse effects due to seismic events or landslides. Therefore, the impact was determined to be less than significant

Impacts from the Proposed Project

No new or substantially more severe impact. Seismic events and related hazards could result in injury, loss of life, and/or property damage as a result of failure of structural and nonstructural building components. However, based on the characteristics of the fault system in El Dorado County, the potential for significant seismic activity to occur in the County over the planning horizon is limited (County 2003). The County may be subject to periodic seismic ground shaking events, but the potential magnitude of such events is low to moderate throughout the County and generally increases from west to east. Additionally, according to the California Earthquake Hazards Zone Application (EQ Zapp), the project is not located within an Earthquake Fault Zone (DOC 2025b).

The proposed broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. As underground fiber optic lines would be located within previously disturbed areas, the risk of localized ground failure is assumed to have already been minimized through previous grading, compaction, and use of engineered fills.

Additionally, the design and construction of the proposed project would be conducted in accordance with the CBC and other applicable engineering specifications and grading regulations that would further reduce the potential for adverse effects due to seismic events or landslides. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, if an individual fiber project would disturb more than one acre of soil, a Stormwater Pollution Prevention Program (SWPPP) with project-specific best management practices (BMPs) would be implemented. Additionally, adherence to relevant State and local regulations would adequately address the potential effects on unstable slopes and erosion. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The construction methods for the project would include jack and bore, trench, plow, and missile. The disturbed soil could be exposed to wind, water erosion, and the loss of topsoil during these construction methods. However, as the project would disturb more than one acre of soil, the project would be required to comply with the California Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires implementation of a SWPPP and specific BMPs to prevent erosion. Typical erosion-prevention BMPs such as silt fences, stakes straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover would be used to minimize erosion impacts. Additionally, the project would be required to adhere to relevant State and local regulations, including the *El Dorado County Grading, Erosion, and Sediment Control Ordinance*.

Therefore, with the implementation of a SWPPP and specific BMPs as well as adherence to relevant State and local regulations, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in the on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that adherence to relevant State and local regulations, as well as preparation of a preliminary soils/geotechnical report, would adequately address the potential risks of unstable soils. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. According to the EQ Zapp, the project is not located within an Earthquake Fault Zone, Liquefaction Zone, or Landslide Zone (DOC 2025b). Design and construction of the proposed project would be conducted in accordance with the CBC and other applicable engineering specifications and grading regulations that would further reduce the potential for adverse effects due to landslides, lateral spreading, subsidence, liquefaction, or collapse. Additionally, prior to construction, a preliminary soils/geotechnical report would be required to be prepared as part of the grading permit application process. All grading activities would be required to comply with the *El Dorado County Grading, Erosion, and Sediment Control Ordinance*. Therefore, adherence to relevant State and local regulations, as well as preparation of a preliminary soils/geotechnical report, would adequately address the potential risks of unstable soils. Therefore, the impact would be less than

significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that preparation of a preliminary soils/geotechnical report prior to construction of individual fiber projects and adherence to CBC requirements and the *El Dorado County Grading, Erosion, and Sediment Control Ordinance* would adequately address the potential effects related to expansive soils. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Soils that contain high proportions of clay are referred to as expansive soils, due to the high shrink-swell potential of clay. Soil surveys typically rate shrink-swell potential in soils on a low, medium, and high basis. Generally, soil in western El Dorado County has a low to moderate shrink-swell potential. Soil located on jurisdictional lands on the western slope of El Dorado County consists of well-drained silt and gravelly loams. The majority of soil in western El Dorado County has a low to moderate shrink-swell potential; a minimal amount has been mapped as high potential. The remaining areas are typically rock formations and are not rated (County 2003).

The proposed project would be subject to CBC Section 1808.6, which requires design features for foundations of buildings and structures in areas subject to expansive soils. Prior to construction, a preliminary soils/geotechnical report would be prepared as part of the grading permit application process when expansive soils are present. Recommendations identified in soils/geotechnical reports, including appropriate site and building design measures if expansive soils are present, would be required to be incorporated into the final project plans and specifications (Sec. 15.14.030 of the *El Dorado County Grading, Erosion, and Sediment Control Ordinance*). Preparation of a preliminary soils/geotechnical report prior to construction and adherence to CBC requirements and the *El Dorado County Grading, Erosion, and Sediment Control Ordinance* would adequately address the potential effects related to expansive soils. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact GEO-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Impacts from the El Dorado County Broadband Fiber Project PEIR

No impact. The PEIR determined that, as the El Dorado County Broadband Project would not involve the use or installation of septic or alternative water disposal systems, no impact would occur.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. The project would not use a septic or alternative water disposal system. Therefore, no impact would occur, as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact GEO-6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, due to the existing geology of the County and because individual fiber projects would be constructed on previously disturbed and/or developed areas, the potential impacts to paleontological resources would be less significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The County, including the proposed project site, is located within the Sierra Nevada geomorphic province. Based on geologic mapping, the majority of the County, especially in the Sierra Nevada Mountains, is underlain by granitic and volcanic rocks, which are generally not fossil-bearing. The geology of the County is predominantly igneous (volcanic) in nature and the type of sedimentary deposits where palaeontologic remains might be present are minimal (County 2003).

The proposed broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. For these reasons, it is not anticipated that these previously disturbed portions of the project area would contain paleontological resources. Therefore, the impact would be less significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to geology and soil would occur compared to what was evaluated in the PEIR. No mitigation measures related to geology and soils were included in the PEIR.

VIII. GREENHOUSE GAS EMISSIONS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[1]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	LTS	Impact GHG-1, pp. 4.8-11 – 4.8-12	Yes	N/A	LTS	No
Impact GHG-2: Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?	LTS	Impact GHG-2, pp. 4.8-12	Yes	N/A	LTS	No

[1]LTS = Less than significant impact

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

New GHG Emissions Impacts: Would the project result in other impacts to GHG emissions that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact GHG-1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that construction emissions from individual fiber projects under the El Dorado County Broadband Fiber Project would not exceed SMAQMD's greenhouse gas (GHG) construction emission threshold. Additionally, operation of the individual fiber projects under the El Dorado County Broadband Fiber Project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. Therefore, the individual fiber projects were determined to produce negligible operational emissions. Therefore, the El Dorado County Broadband Fiber Project was determined to not generate significant GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the impact was concluded to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction Emissions

As outlined in Section 4.3, Air Quality, of the PEIR, the El Dorado County Broadband Fiber Project's temporary construction GHG emissions were estimated using CalEEMod, assuming construction at up to

10 individual fiber project construction sites. The PEIR concluded that the annual El Dorado County Broadband Fiber Project construction GHG emissions would not exceed SMAQMD's construction GHG emission threshold.

As the proposed project would be consistent with the construction assumptions in the PEIR, the proposed project's annual construction GHG emissions would not exceed SMAQMD's construction GHG emission threshold. Additionally, construction emissions would be short term and temporary and would not result in long-term emissions. Once construction is completed and the proposed broadband infrastructure is installed, GHG emissions would be significantly reduced to negligible levels. There would be no net change in permanent GHG emissions compared to existing conditions.

Operational Emissions

Operation of the proposed project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. An emergency backup generator may be used at the proposed project site in the event of a power outage or for routine testing. Monthly routine testing is assumed to last 15 minutes per testing event. As routine use of backup generators would be limited, the project would produce minimal operational emissions.

Impact Conclusion

The project's construction GHG emissions would not exceed SMAQMD's GHG construction emission threshold. Additionally, operation of the project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. The proposed project would produce negligible operational emissions. Therefore, the project would not generate significant GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact GHG-2: Would the project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that individual fiber projects under the El Dorado County Broadband Fiber Project would be consistent with the El Dorado County General Plan, City of South Lake Tahoe General Plan, City of South Lake Tahoe CAP, and SMAQMD construction GHG thresholds. The impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. GHG emissions are addressed within the El Dorado County General Plan. As discussed under Impact GHG-1, the annual project construction GHG emissions would not exceed SMAQMD's construction GHG emission threshold. Additionally, operation of the project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance activities. Therefore, the project would be consistent with the El Dorado County General Plan and SMAQMD construction GHG threshold. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project.

No new or substantially more severe impacts related to GHG emissions would occur compared to what was evaluated in the PEIR. No mitigation measures related to greenhouse gas emissions were included in the PEIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact HAZ-1: Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	LTS	Impact HAZ-1, pp. 4.9-25 – 4.9-26	Yes	N/A	LTS	No
Impact HAZ-2: Create a significant hazard to the public hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LTSM	Impact HAZ-2, pp. 4.9-26 – 4.9-28	Yes	MM AQ-2	LTSM	No
Impact HAZ-3: Emit hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTSM	Impact HAZ-3, pp. 4.9-28	Yes	MM AQ-2	LTSM	No
Impact HAZ-4: Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Section 65962.5 of the California Government Code and, as a result, would create a significant hazard to the public or the environment?	LTSM	Impact HAZ-4, pp. 4.9-28 – 4.9-29	Yes	MM AQ-2	LTSM	No
Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	LTS	Impact HAZ-5, pp. 4.9-29 – 4.9-30	Yes	N/A	LTS	No
Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTSM	Impact HAZ-6, pp. 4.9-30 – 4.9-32	Yes	MM TRA-1	LTSM	No
Impact HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	LTS	Impact HAZ-7, pp. 4.9-32 – 4.9-33	Yes	N/A	LTS	No

[1]LTS = Less than significant impact. LTSM = Less than significant impact with mitigation.

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

New Hazards and Hazardous Materials Impacts: Would the project result in other impacts related to hazards and hazardous materials that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact HAZ-1: Would the project create a significant hazard to the public or the environment through routing transport, use, or disposal of hazardous materials?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects under the El Dorado County Broadband Fiber Project would be required to implement and comply with local, State, and federal regulations regarding hazardous materials, the El Dorado County Broadband Fiber Project would not create significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials. The impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of approximately 27.87 miles of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. The proposed project would not require long-transport, use, or disposal of hazardous materials; however, small quantities of hazardous materials may be stored, used, and handled during construction activities as part of the installation of underground fiber optic lines in buried conduit. Construction activities would mainly involve the use of hazardous materials such as fuels, lubricants, and solvents typically associated with construction equipment and vehicles. These materials are commonly used during construction and are not acutely hazardous. Similarly, operation of underground fiber optic conduit would not require long-transport, use, or disposal of hazardous materials; however, small quantities of hazardous materials may be used or handled during routine maintenance checks.

The project applicant, builders, and contractors for the proposed project would be required to use, store, and transport hazardous materials in accordance with local, State, and federal regulations, including California Division of Occupational Safety and Health (Cal/OSHA) and the California Department of Toxic Substances Control (DTSC) requirements and manufacturer's instructions, during construction and operation of the project. Transportation of hazardous materials on roadways is also regulated by the California Highway Patrol (CHP) and Caltrans. Title 49 of the CFR, *Hazardous Materials Regulations*, includes requirements for the classification of materials, packaging, hazard communication, transportation, handling, hazardous materials employee training, and incident reporting.

The California Department of Public Health regulates the haulers of hazardous waste. A valid registration issued by DTSC is required, unless specifically exempted, to transport hazardous waste, and the California Department of Motor Vehicles (DMV) requires all hazardous materials transporters to possess a commercial driver's license with a hazardous materials endorsement. Vehicle Code Section 31303 outlines general route and parking restrictions for hazardous material and hazardous waste shipments, and the CHP publishes a list of restricted or prohibited highways. The Federal Motor Carrier Safety Administration also maintains a Hazmat Route Registry that describes the highway routes that must be

utilized for the transport of certain classes of hazardous waste that is monitored and regulated by the administration's field office and the CHP.

As the proposed project would be required to implement and comply with local, State, and federal regulations regarding hazardous materials, the project would not create significant hazards to the public or environment through the routine transport, use, and disposal of hazardous materials. The impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HAZ-2: Would the project 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?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that, due to the limited area of ground disturbance and short exposure window, the potential for construction activities to encounter hazardous conditions that could affect workers' health, or the environment would be limited. However, as the location of individual fiber projects relative to hazardous materials sites is not yet known, there would be some potential for exposure of construction workers and the public to hazardous materials contamination during construction. The PEIR concluded that, 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.

Additionally, the PEIR concluded that individual fiber projects under the El Dorado County Broadband Fiber Project may be located within designated NOA review area on the El Dorado County Asbestos Review Area Map, as shown in 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"). As outlined in Mitigation Measure AQ-2, prior to construction, an Asbestos Dust Mitigation Plan would be required to be submitted to the Air Pollution Control Officer if any portion of the disturbed project area is within a designated NOA review area on the El Dorado County Asbestos Review Area Map; however, an exemption to this requirement may apply 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. Additionally, if, prior to construction and 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, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer if any portion of the individual project area to be disturbed has NOA. As individual fiber projects under the El Dorado County Broadband Fiber Project may be located within designated NOA review area on the El Dorado County Asbestos Review Area Map, preparation of an Asbestos Dust Mitigation Plan, as outlined in Mitigation Measure AQ-2, would be required. With implementation of Mitigation Measure AQ-2, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements.

Documented or Undocumented Hazardous Materials Site

Installation and maintenance activities have the potential to occur within the boundaries of a known hazardous waste site or in areas with existing soil or groundwater contamination. Proposed underground fiber optic lines could be constructed in areas that have existing buried utilities that could contain hazardous waste. The proposed project would also involve ground disturbance in the upper layers of soil along existing roadways. Disturbance of sites with known or previously unknown hazardous material contamination could cause various short-term or long-term adverse health effects in persons exposed to hazardous substances. Since no portion of the proposed alignment would be located on or near a hazardous materials site, no Phase I ESA would be required.

If an unidentified underground storage tank were to be uncovered or disturbed during construction activities, it would be required to be sealed and abandoned in place or removed, per federal, State, and local regulations. The extent to which groundwater may be affected depends on the type of contaminant, the amount released, and depth to groundwater at the time of the release. If groundwater contamination is identified, remediation activities would be required by the CVRWQCB.

Radiofrequency Energy

Utility structures, such as a telecommunications utility pole have the potential to emit radiofrequency (RF) energy, a type of electromagnetic energy. According to the Federal Communications Commission (FCC) Office of Engineering & Technology, levels of RF energy routinely encountered by the general public are typically far below levels necessary to produce significant heating and increased body temperature (FCC 2025). There have been no conclusive, independently replicated studies that have examined the possibility of a link between RF exposure and cancer, and other studies have failed to find evidence for a causal link to cancer or any related conditions (FCC 2025). As no conclusive or causal evidence of biological effects from RF energy has been determined, there is no evidence to suggest the proposed telecommunications utility poles would cause health problems to the surrounding communities. Additionally, the proposed project would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. No aboveground utility poles are proposed under the project.

Asbestos

As outlined in Mitigation Measure AQ-2, 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, if, prior to and during construction, 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 would be submitted to the Air Pollution Control Officer. Therefore, as NOA may be discovered prior to and during construction of the proposed project, Mitigation Measure AQ-2 would be implemented.

Aerially Deposited Lead

It is likely that Aerially Deposited Lead (ADL) is present along some of the older major roadways in the County. ADL is known to exist along the California State Highway System. The project would be required to implement and comply with federal, State, and local regulatory requirements to reduce the potential for exposure to the public or environment to hazards.

Spillage

Spills during on-site fueling of equipment during construction or an upset condition could result in a release of fuel or oils into the environment, including sensitive waterways within the vicinity of the proposed activity. Procedures regarding spill prevention and response, as well as proper handling and disposal of hazardous materials are established by federal, State, and local regulations and would be required to be implemented as part of the proposed project.

Impact Conclusion

Since no portion of the proposed alignment would be located near or on a hazardous materials site, a Phase I ESA would not be required to be prepared to evaluate and address potential exposure. According to the State Water Resources Control Board's (SWRCB's) GeoTracker database, there is one closed LUST Cleanup Site along the project alignment (SWRCB 2025). The LUST Cleanup Site is located at 6701 Wentworth Springs Road and was closed in 1994. However, there are no hazardous material sites located in the vicinity of the proposed project, as shown on the DTSC's EnviroStor database. As such, the proposed project is not located on a list of hazardous material sites compiled pursuant to Section 65962.5(a)(1) of the Government Code and would not require a Phase I ESA. Additionally, as the proposed project may be located within the designated NOA review area on the El Dorado County Asbestos Review Area Map, preparation of an Asbestos Dust Mitigation Plan, as outlined in Mitigation Measure AQ-2, would be required. With implementation of Mitigation Measure AQ-2, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HAZ-3: Would the project emit hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that individual fiber projects under the El Dorado County Broadband Fiber Project located near or on a hazardous materials site shall be required to prepare a Phase I ESA to evaluate and address potential exposure.

Additionally, the PEIR concluded that individual fiber projects under the El Dorado County Broadband Fiber Project may be located within designated NOA review area on the El Dorado County Asbestos Review Area Map, as shown on 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"). As outlined in Mitigation Measure AQ-2, prior to construction, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer if any portion of the disturbed project area is within a designated NOA review area on the El Dorado County Asbestos Review Area Map; however, an exemption to this requirement may apply 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. Additionally, if, prior to construction and during construction, regardless of the area designation on the El Dorado County Asbestos Review Area Map, and regardless of any previously granted exemption, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer if any portion of the individual project area to be disturbed has NOA. As individual fiber projects under the El Dorado County Broadband Fiber Project may be located within designated NOA review area on the El Dorado County

Asbestos Review Area Map, preparation of an Asbestos Dust Mitigation Plan, as outlined in Mitigation Measure AQ-2, would be required. With implementation of Mitigation Measure AQ-2, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The nearest school to the project site is American River Charter School located less than 100 feet south of the proposed project alignment at 6620 Wentworth Springs Road, Georgetown. Although portions of the proposed broadband infrastructure would be located within one-quarter mile of an existing school, the project is not located on or near an active hazardous materials site and would not require preparation of a Phase I to evaluate and address potential exposure.

Additionally, portions of the proposed project would be located within the Asbestos Review Parcels as seen on the El Dorado County Asbestos Review Area Map included as Figure 4.3-1 of the PEIR. However, as outlined in Mitigation Measure AQ-2, regardless of the area designation on the El Dorado County Asbestos Review Area Map, and regardless of any previously granted exemption, if, prior to and during construction, the owner/operator, a professional geologist, or the Air Pollution Control Officer determines that any portion of the project alignment contains NOA, an Asbestos Dust Mitigation Plan would be submitted to the Air Pollution Control Officer. Therefore, as NOA may be discovered prior to and during construction of the proposed project, Mitigation Measure AQ-2 would be implemented.

With implementation of Mitigation Measure AQ-2, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HAZ-4: Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Section 65962.5 of the California Government Code and, as a result, would create a significant hazard to the public or the environment?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that individual fiber projects located near or on a hazardous materials site shall be required to prepare a Phase I ESA to evaluate and address potential exposure. With implementation of Mitigation Measure AQ-2, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Section 65962.5(a)(1) of the Government Code requires the California Department of Toxic Substances Control (DTSC) to compile and submit to the Secretary for Environmental Protection a list of all sites listed pursuant to Section 25356 of the Health and Safety Code (HSC). HSC Section 25356(b)(1) requires a listing of hazardous substance release sites selected for, and subject to, a response action under this chapter. Additionally, HSC Section 25356(b)(2) requires DTSC to update the list of sites at least annually to reflect new information regarding previously listed sites or the addition of new sites requiring response action.

According to the State Water Resources Control Board's (SWRCB's) GeoTracker database, there is one closed LUST Cleanup Site along the project alignment (SWRCB 2025). The LUST Cleanup Site is located at 6701 Wentworth Springs Road and was closed in 1994. However, there are no hazardous material sites located in the vicinity of the proposed project, as shown on the DTSC's EnviroStor database. As such, the proposed project is not located on a list of hazardous material sites compiled pursuant to Section 65962.5(a)(1) of the Government Code. With implementation of Mitigation Measure AQ-2, as previously discussed, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that compliance with the El Dorado County Transportation Commission (EDCTC) and South Lake Tahoe Airport Land Use Compatibility Plans (ALUCPs) would substantially limit the potential for exposure of people to aircraft-related hazards. Therefore, the El Dorado County Broadband Fiber Project would not pose a safety hazard or excessive noise with regard to airport operations, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project.

The closest public airport is the Georgetown Airport, located off of the Spanish Dry Diggins Road portion of the proposed project alignment at 6245 Aerodome Way, Georgetown. The central portion of the proposed broadband infrastructure alignment is largely located within the Georgetown Airport Influence Area. A portion of the proposed project alignment along Spanish Dry Diggins Road would be located within Safety Zone 1 (Runway Protection Zone), Zone 2 (Inner Approach/Departure Zone), and Zone 3 (Inner Turning Zone).

Land uses prohibited by the EDCTC ALUCP Safety Zones for the Georgetown Airport is provided in Table 4.9-1 of the El Dorado County Broadband Fiber Project PEIR. Below are the prohibited land uses within safety zones 1 through 3 which would be transected by the proposed project as noted above:

- **Safety Zone 1 (Runway Protection Zone):** all land uses and structures are prohibited except ones required by aeronautical function, and except for the following, which are conditionally compatible uses: natural land areas, water, and agriculture (except residences and livestock).

- **Safety Zone 2:** the following land uses are prohibited within this safety zone: Outdoor major assembly facilities, group recreation, local parks, camping, eating/drinking establishments; Multi-family residential, long-term and short-term lodging, congregate care, all educational and

institutional uses, research and development; Major and local retail, vehicle fueling, hazardous materials production and heavy industrial, communications facilities; and power plants.

- **Safety Zone 3:**

The broadband infrastructure for this project would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. Since no aboveground broadband infrastructure is proposed under the project, implementation of the proposed project would not create an incompatible land use in any of the safety zones. Additionally, the following would be included as a condition of approval for the proposed project: Prior to the commencement of construction activities within any of the Georgetown Airport safety zones, the County will contact the Georgetown Airport and coordinate with them accordingly throughout construction activities within the Safety Zones to ensure that there is no conflict with FAA safety requirements or with airport access.

While construction and operation of the proposed project could require workers to be present within an airport for installation and maintenance activities, workers would only be within a given area for brief periods of time and compliance with the EDCTC ALUCP would substantially limit the potential for exposure of people to aircraft-related hazards. Additionally, the proposed project would not include permanent structures for human occupancy and would therefore not create the potential to expose residents to airport-related noise. Therefore, the impact would be less than significant as there would be no *new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HAZ-6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that with implementation of Mitigation Measure TRA-1, which requires preparation of a Traffic Control and Detour Plan, individual fiber projects under the proposed El Dorado County Broadband Fiber Project would not impair implementation of or physically interfere with an adopted emergency response plan. The impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Implementation of the proposed project would introduce a wider and more reliable network throughout the unincorporated community of Georgetown. The proposed 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. The project may also increase individuals' access to telehealth, which could reduce the need for medical emergency response vehicles and demand for emergency response services.

Construction

The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. Construction of the proposed project may require temporary lane closures along roads within the project alignment in Georgetown, which would have the potential to impede or interfere with emergency access routes or

services. However, coordination with local agencies for any necessary and temporary road closures would be required prior to the start of construction. As discussed in Section 5.XVII, *Transportation,* to minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, the proposed project would be required to develop and implement a Traffic Control and Detour Plan as outlined in Mitigation Measure TRA-1. Due to the location of the proposed project, an Encroachment Permit application would be submitted to the County Department of Transportation and Caltrans District 3 for review and approval. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along County and Caltrans ROW, and would be subject to review and approval by the County Department of Transportation.

Operation

Operational activities for the proposed project would be limited to routine maintenance and emergencies. Infrastructure such as circuit cabinets with cooling fans and/or stand-by generators associated with the project may be routinely checked, as needed. Operation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact Conclusion

With implementation of Mitigation Measure TRA-1, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HAZ-7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that adherence to existing regulations would ensure that impacts related to fire risks from construction would be less than significant. Additionally, as fiber optic lines do not carry an electrical charge and are therefore not a source of heat, fiber optic lines would not exacerbate fire risk. Therefore, impacts related to fire risks from project operation were determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone maps, the proposed project is within State and Federal Responsibility Areas (SRA and FRA), and is located within areas mapped as Very High Fire Hazard Severity Zones (FHSZs) (CAL FIRE 2025).

Construction

The construction methods for the project would include jack and bore, trench, plow, and missile. Construction activities that could result in sparks, such as welding or grinding, have a greater likelihood of creating a source of ignition than other construction-related activities. Adherence to County ordinances, CBC Chapter 7A, *Materials and Construction Methods for Exterior Wildfire Exposure*, and PRC Section 4291, requires property owners to maintain clearance of flammable vegetation of 100 feet

from structures in order to reduce the risk of fire. The County's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) identifies 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, construction workers would be trained in basic firefighting, and the availability of tools and training would allow construction crews to help control or extinguish fires they may come upon.

Operation

The proposed broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. Buried conduits would not exacerbate fire risk as all infrastructure would be located underground. Additionally, fiber optic lines do not carry an electrical charge and are therefore not a source of heat (Fluke Networks 2021). Therefore, fiber optic lines would not exacerbate fire risk.

Impact Conclusion

Construction and operation of the proposed project would not exacerbate wildland fire risks. Therefore, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

With implementation of Mitigation Measures AQ-2 and TRA-1 from the PEIR, no new or substantially more severe impacts related to hazards and hazardous materials would occur compared to what was evaluated in the PEIR. MMs from the PEIR that are applicable to the proposed project are provided below.

AQ-2: 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 (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.

TRA-1: 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.

X. HYDROLOGY AND WATER QUALITY

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact HYD-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	LTS	Impact HYD-1, pp. 4.10-20 – 4.10-21	Yes	N/A	LTS	No
Impact HYD-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	Impact HYD-2, pp. 4.10-21 – 4.10-22	Yes	N/A	LTS	No
Impact HYD-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?	LTS	Impact HYD-3, pp. 4.10-22 – 4.10-23	Yes	N/A	LTS	No
Impact HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LTS	Impact HYD-4, pp. 4.10-24	Yes	N/A	LTS	No
Impact HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	Impact HYD-5, pp. 4.10-24 – 4.10-25	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Hydrology and Water Quality Impacts: Would the project result in other impacts to hydrology and water quality that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact HYD-1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that implementation of individual fiber projects under the El Dorado County Broadband Fiber Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, and the impact on water quality was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The construction methods for the project would include jack and bore, trench, plow, and missile. These construction methods have the potential to impact water quality through soil erosion and increased silt and debris discharged via surface runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Temporary storage of construction materials and equipment in work or staging areas could create the potential for the release of hazardous materials, trash, or sediment to the storm drain system. As the project would disturb more than one acre of soil, the project would be required to comply with the California Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012- 0006-DWQ), which requires implementation of a SWPPP and specific BMPs to minimize degradation of water quality during construction and operation. Typical BMPs would include diversion of runoff from disturbed areas, protective measures for sensitive areas, temporary soil stabilization measures, storm water runoff quality control measures, concrete waste management, watering for dust control, and installation of perimeter silt fences, as needed.

All construction areas would be cleared after construction is completed and all debris would be removed. Once the project is constructed, it would require occasional operational maintenance needs. Therefore, implementation of the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The impact on water quality would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the El Dorado County Broadband Fiber Project PEIR.

Impact HYD-2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that implementation of individual fiber projects under the El Dorado County Broadband Fiber Project would not substantially decrease groundwater supplies, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The western slope of El Dorado County, where the proposed project is located, does not have traditional groundwater basins. The geology of the western

slope of the County is primarily hard crystalline or metamorphic rock, which forms the land surface or is covered by a thin soil or isolated alluvial layer. In this type of hydrogeologic environment, the presence of groundwater and potential well capacities are dependent not only on geographic location and geology, but also on the number and size of fractures encountered where a well is drilled, the degree of connectivity between those fractures and other fractures, and the seasonal and annual recharge of the bedrock fracture network.

Construction of the project could involve minor use of water for dust control, per EDCAQMD Rule 223-1, which would be readily available from existing sources. Operation of the project would not require additional water supplies as no population would be generated. Therefore, implementation of the proposed project would not substantially decrease groundwater supplies. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HYD-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

HYD-3 (i): Result in substantial erosion or siltation on- or off-site?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, if an individual fiber project under the El Dorado County Broadband Fiber Project would disturb more than one acre of soil, a SWPPP with project-specific BMPs would be implemented. Additionally, adherence to relevant State and local regulations would adequately address the potential effects on unstable slopes and erosion. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The construction methods for the proposed project would include jack and bore, trench, plow, and missile. The disturbed soil could be exposed to wind, water erosion, and the loss of topsoil. As the project would disturb more than one acre of soil, the project would be required to comply with the California Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012- 0006-DWQ), which requires implementation of a SWPPP and specific BMPs to prevent erosion. Typical erosion-prevention BMPs such as silt fences, stakes straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover would be used to minimize erosion impacts. Additionally, the project would be required to adhere to relevant State and local regulations, including the *El Dorado County Grading, Erosion, and Sediment Control Ordinance*. Therefore, with the implementation of a SWPP and specific BMPs as well as adherence to relevant State and local regulations, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

HYD-3 (ii): Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that due to the lack of extensive low-lying areas and a large number of upland areas, the majority of El Dorado County is not subject to flooding. Additionally, individual fiber projects would be required to comply with existing ordinances and construction standards of the County, Tahoe Regional Planning Agency (TRPA), and cities of Placerville and South Lake Tahoe to prevent flooding within 100-year flood zones. Therefore, the impact on surface water runoff was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. Site cleanup and surface restoration under the project would be performed promptly following broadband infrastructure installation. Cleanup would include removing construction-related debris and restoring original surfacing and contours. Any disturbed areas would be returned to their original or better condition by replacing all asphalt, landscaping, or any earthen areas. According to the Federal Emergency Management Agency's (FEMA's) National Flood Hazard Layer (NFHL), no portion of the project alignment would be located within a flood zone (FEMA 2025). Therefore, the impact on surface water runoff would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

HYD-3 (iii): Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that implementation of the El Dorado County Broadband Fiber Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. As noted under Impact HYD-1, as the project would disturb more than one acre of soil, the project would be required to comply with the California Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires implementation of a SWPPP and specific BMPs to minimize degradation of water quality during construction and operation. Through implementation of BMPs, substantial new sources of runoff would be intercepted and prevented from entering drainage systems or surface waters.

Once constructed, the project would require occasional operational maintenance needs that would not exceed the capacity of existing or planned stormwater drainage systems. Therefore, implementation of the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. Therefore, the impact would be less than significant

as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

HYD-3 (iv): Impede or redirect flood flows?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant. The PEIR concluded that the impact related to flood flows would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. As discussed above under Impacts HYD-3 (i) and (iii), runoff associated with construction of the proposed project would be controlled through preparation and implementation of a SWPPP and associated BMPs. Additionally, the project would be required to conform to the *El Dorado County Grading, Erosion, and Sediment Control Ordinance.* Once constructed, the project would require occasional operational maintenance needs which would not impede or redirect flood flows. Therefore, the impact on flood flows would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HYD-4: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, due to the existing conditions within the County, implementation of the proposed El Dorado County Broadband Fiber Project would not release pollutants due to flood hazards, tsunamis, or seiches, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project is approximately 120 miles northwest of the Pacific Ocean, so the project is not at risk from tsunamis. Additionally, as discussed in Section 5.VII, *Geology and Soils,* the project is not located within an Earthquake Fault Zone (DOC 2025b). Based on the characteristics of the fault system in El Dorado County, the potential for significant seismic activity to occur in the County is limited; therefore, earthquake-induced seiches do not pose a risk to the majority of the County. According to the California Department of Water Resources (DWR), El Dorado County does not have a history of major dam failure. Due to these existing conditions, the project would not release pollutants due to flood hazards, tsunamis, or seiches. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact HYD-5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the proposed El Dorado County Broadband Fiber Project would not conflict with the 2019 Water Resource Development and Management Plan (WRDMP)

and the Sustainable Groundwater Management Act (SGMA). The impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. El Dorado Water Agency's (EDWA's) 2019 WRDMP addresses the need for a reliable water supply, protection of water quality, and infrastructure enhancements in the County. The WRDMP includes a comprehensive assessment of current water resources, projections for future demand, and measures to improve water conservation and system resilience. The WRDMP includes regulatory components that are built upon existing environmental programs and activities implemented by various County and city departments and focuses on land development activities subject to the County's permitting requirements (EDWA 2019). The proposed project would comply with the WRDMP, as well as comply with ordinances and construction standards of the County. As the project would disturb more than one acre of soil, the project would be required to comply with the California Construction General Permit Order 2009-0009-DWQ (as amended by 2010-0014-DWQ and 2012-0006-DWQ), which requires implementation of a SWPPP and specific BMPs. Additionally, the project would be required to conform to the *El Dorado County Grading, Erosion, and Sediment Control Ordinance.*

SGMA establishes a framework for long-term sustainable groundwater management across California and requires local agencies to bring over drafted basins into balanced levels of pumping and recharge (DWR 2025). As discussed above under Impact HYD-2, construction of the project could involve minor use of water for dust control, per EDCAQMD Rule 223-1, which would be readily available from existing sources. Operation of the project would not require additional water supplies as no population would be generated. Therefore, the proposed project would not conflict with the WRDMP and SGMA. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to hydrology and water quality would occur compared to what was evaluated in the PEIR. No mitigation measures related to hydrology and water quality were included in the PEIR.

XI. LAND USE AND PLANNING

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact LUP-1: Physically divide an established community?	LTS	Impact LUP-1, pp. 4.11-8	Yes	N/A	LTS	No
Impact LUP-2: Cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	Impact LUP-2, 4.11-9	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Land Use and Planning Impacts: Would the project result in other impacts to land use and planning that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact LUP-1: Would the project physically divide an established community?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, although minor temporary construction-related traffic disturbances could occur, the individual fiber projects implemented under the El Dorado County Broadband Fiber Project would not permanently divide an established community. Therefore, the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. Staging areas are anticipated to be located along roadway cross-sections within the project alignment; however, the exact locations of staging areas and equipment lay-down areas would be determined during the final construction plans.

The proposed project would not result in the development of new roadways or physical features, and would not substantially alter existing roadways through existing residential neighborhoods or other communities. Although minor temporary construction-related traffic disturbances could occur, the

proposed project would not permanently divide an established community. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact LUP-2: Would the project cause significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that prior to issuance of all applicable permits, individual fiber projects would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances. Therefore, the PEIR determined that the El Dorado County Broadband Fiber Project would not conflict with any land use plan, policy, or regulation, and the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. As such, there are various general plan land use designations and zoning designations within the project area. Prior to the issuance of all applicable permits, outlined in Section 2.1, the proposed project would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances. Therefore, the proposed project would not conflict with any land use plan, policy, or regulation. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to land use and planning would occur compared to what was evaluated in the PEIR. No mitigation measures related to land use and planning were included in the PEIR.

XII. MINERAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact MIN-1: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	LTS	Impact MIN-1, pp. 4.12-5	Yes	N/A	LTS	No
Impact MIN-2: Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	LTS	Impact MIN-1, pp. 4.12-5	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Mineral Resources Impacts: Would the project result in other impacts to mineral resources that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact MIN-1: Would the project 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?

Impact MIN-2: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, as individual fiber projects would be primarily constructed within previously disturbed areas along the typical roadway cross-section, Caltrans ROW, or disturbed areas within private or federal lands, the proposed El Dorado County Broadband Fiber Project would not interfere with the existing mines or mineral land classification studies. Therefore, the impact was determined to be less than significant for Impact MIN-1 and MIN-2.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and road corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project. Staging areas would be located

along roadway cross-sections; however, the exact locations of staging areas and equipment lay-down areas would be determined during the final construction plans.

According to the DOC Mines Online Database, there are no mineral resource recovery sites within the project alignment (DOC 2025c). The project is located within three mineral land classification studies: Mineral Land Classification of the Georgetown 15' Quadrangle, El Dorado, and Placer Counties, California, 1983; Mineral Land Classification of El Dorado County, California, 2001; and Mineral Land Classification: Concrete Aggregate in the Greater Sacramento Area Production-Consumption Region, 2018 (DOC 2025d). However, as the proposed project would be primarily located within previously disturbed ROW and corridors and within existing easements, the proposed project would not interfere with existing mines or mineral land classification studies. Therefore, the impact for Impact MIN-1 and Impact MIN-2 would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to mineral resources would occur compared to what was evaluated in the PEIR. No mitigation measures related to mineral resources were included in the PEIR.

XIII. NOISE

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact NOI-1: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTSM	Impact NOI-1, pp. 4.13-15 – 4.13-17	Yes	MM NOI-1 and NOI-2	LTSM	No
Impact NOI-2: Result in generation of excessive groundborne vibration or groundborne noise levels?	LTSM	Impact NOI-2, pp. 4.13-17 – 4.13-18	Yes	MM NOI-3	LTSM	No
Impact NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LTS	Impact NOI-3, pp. 4.13-18	Yes	N/A	LTS	No

[1]LTSM = Less than significant impact with mitigation. LTS = Less than significant impact.
[2]N/A = not applicable; there are no MMs identified in the PEIR for this impact. None = there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Noise Impacts: Would the project result in other noise-related impacts that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact NOI-1: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that with implementation of Mitigation Measure NOI-1, which restricts the construction activity hours for individual fiber projects, the El Dorado County Broadband Fiber Project would not exceed the applicable County construction noise standards, and the impact would be less than significant. Additionally, with implementation of Mitigation Measure NOI-2, which requires emergency generators to be located away from any Noise Sensitive Land Use (NSLU) or

provide sound reduction measures to reduce noise from generators, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction Noise

Implementation of the proposed project would result in a temporary or periodic increase in ambient noise levels related to construction equipment, activities, and vehicles. Construction noise from the proposed project would be temporary and short term as construction occurs intermittently and varies depending on the nature or phase of construction (e.g., jack and bore, trench, plow, and missile). Construction equipment would vary by construction method, but the construction process could include operation of the following types of equipment: bore/drill rigs, cranes, generator sets, excavators, tractors, loaders, backhoes, crawler tractors, concrete/individual saws, rollers, and cement and mortar mixes. 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 from the PEIR would be applicable to the proposed project and would be implemented to restrict the project construction activity hours.

Operational Noise

The proposed project 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 decibels with A weighting (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 minutes during daytime hours, monthly. 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.

Impact Conclusion

With implementation of Mitigation Measures NOI-1 and NOI-2 from the PEIR, the impact related to construction and operational noise would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact NOI-2: Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that with implementation of Mitigation Measure NOI-3, which requires vibratory rollers to be used in static mode only (no vibrations) in proximity to occupied buildings or fragile structure, the short-term construction vibration impacts would be less than significant. Once operational, individual fiber projects would not include significant sources of groundborne vibration. Therefore, long-term, operational vibration impacts were determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction Groundborne Vibration

Project construction activities would not require activities known to generate excessive groundborne vibration, such as pile driving or blasting. A possible source of vibration would occur during the plow and missile construction activities; however, small equipment used during these construction activities for the installation of underground fiber optic lines would not likely provide as much vibration as a large vibratory roller. A large vibratory roller can create approximately 0.210 inch per second peak particle velocity (PPV) at 25 feet (Caltrans 2020). Specific locations where vibratory rollers, or similar equipment, could be used during project construction have not been identified. However, construction vibration impacts would be potentially significant if a vibratory roller or similar equipment 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] 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.

Operational Groundborne Vibration

Once operational, the project would not include significant sources of groundborne vibration. Therefore, long-term, operational vibration impacts would be less than significant.

[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.

Impact Conclusion

Construction vibration impacts would be potentially significant if a vibratory roller or similar equipment 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). 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. Once operational, the project would not include significant sources of groundborne vibration. Therefore, with implementation of Mitigation Measure NOI-3, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that individual fiber projects implemented under the Project would not result in persons working for extended periods in proximity to the Placerville Airport, Cameron Airpark, Georgetown Airport, and South Lake Tahoe Airport. Therefore, the proposed Project would not expose people residing or working in the El Dorado County Broadband Fiber Project area to excessive noise levels from public use airports or private airstrips. The impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The closest public airport is the Georgetown Airport, located off of the Spanish Dry Diggins Road portion of the proposed project alignment at 6245 Aerodome Way, Georgetown. The central portion of the proposed broadband infrastructure alignment is largely located within the Georgetown Airport Influence Area. A portion of the proposed project alignment along Spanish Dry Diggins Road would be located within Safety Zone 1, Runway Protection Zone, Zone 2, Inner Approach/Departure Zone, and Zone 3, Inner Turning Zone.

However, these portions of the proposed project alignment are located outside of the Airport Safety Zones and are within Review Area 2, which includes locations where airspace protection and/or overflight are land use compatibility concerns, but are not noise or safety concerns (EDCTC 2012). Although portions of the proposed project would be located within two miles of a public airport and within Safety Zones 1, 2, and 3, the project would not result in a safety hazard of excessive noise for people residing or working in the project area for the reasons discussed above. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

With implementation of Mitigation Measures NOI-1, NOI-2, and NOI-3 from the PEIR, no new or substantially more severe impacts related to noise would occur compared to what was evaluated in the

PEIR. All noise mitigation measures from the PEIR are applicable to the proposed project and are presented below.

NOI-1: 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.

NOI-2: 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 105 feet from any noise sensitive land use (NSLU; e.g., residences, schools, hospitals, convalescent homes, churches, libraries). If it is not feasible to locate emergency generators 105 feet or more from all NSLUs, the project proponent shall incorporate noise attenuating features (e.g., generator sound enclosures, noise barriers) into the equipment installation sufficient to reduce generator noise levels to 55 dBA L_{eq} or less measured at outdoor use areas or building edges of the closes NSLU. Noise levels at NSLUs shall be verified by a qualified acoustical professional.

NOI-3: Prior to issuing individual fiber 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.

XIV. POPULATION AND HOUSING

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact POP-1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	Impact POP-1, pp. 4.14-13	Yes	N/A	LTS	No
Impact POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	NI	Impact POP-2, pp. 4.14-13 – 4.14-14	Yes	N/A	NI	No

[1]LTS = Less than significant impact. NI = No impact.

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

New Population and Housing Impacts: Would the project result in other impacts to population and housing that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact POP-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the El Dorado County Broadband Fiber Project would not directly induce population growth, as the El Dorado County Broadband Fiber 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. However, the PEIR assumed that implementation of the El Dorado County Broadband Fiber Project would contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. However, the potential for this growth would be limited and would not result in substantial population growth in the County. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. Construction of the project is anticipated to begin in 2026 and be completed in 2027. Operation of the project would be limited to routine

maintenance or emergencies. It is anticipated that construction and operational activities under the proposed project would not directly generate a substantial number of jobs, either temporarily or during maintenance operations, such that it would induce substantial population growth in the County. The installation of broadband infrastructure under the proposed project would bring reliable connectivity to the community of Georgetown and increase health and safety factors, as well as providing and expanding the availability of high-speed internet access to existing rural residents, businesses, schools, etc. It is reasonable to assume that implementation of the proposed project would contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. However, the potential for this growth would be limited and would not induce substantial growth in the County. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact POP-2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impacts from the El Dorado County Broadband Fiber Project PEIR

No impact. The PEIR concluded that individual fiber projects under the El Dorado County Broadband Fiber Project would not displace people or housing, or require the construction of replacement housing, as they would improve broadband within areas of the County that are currently unserved or underserved. Therefore, no existing people or housing would be displaced by the proposed project and the PEIR concluded that no impact would occur.

Impacts from the Proposed Project

No new or substantially more severe impact. Implementation of the proposed project would not require the construction of housing and, therefore, would not contribute to substantial unplanned population growth. The project would not displace people or housing, or require the construction of replacement housing. Therefore, no existing people or housing would be displaced by the proposed project. No impact would occur, as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project.

No new or substantially more severe impacts related to population and housing impact would occur compared to what was evaluated in the PEIR. No mitigation measures related to population and housing were included in the PEIR.

XV. PUBLIC SERVICES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact PS-1: Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks, or other public facilities?	LTS	Impact PS-1, pp. 4.15-18 – 4.15-20	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Public Service Impacts: Would the project result in other impacts to public services that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact PS-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks, or other public facilities?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the proposed El Dorado County Broadband Fiber Project would not generate an increased need for public services, such as fire or police protection, schools, or parks. In addition, construction of individual fiber projects would not physically alter existing government facilities such that service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities would be affected. Therefore, the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. All underground fiber optic lines would be new, proposed infrastructure. No aboveground broadband infrastructure is proposed under the project.

Fire Protection

The project area currently receives fire protection from the Georgetown Fire Protection District, the Foresthill Fire Protection District, and CAL FIRE. The closest fire stations to the project site include Georgetown Fire Department Station 61, Foresthill Fire Station 90, and CAL FIRE Garden Valley Fire Station 50. The proposed project would be required to comply with all applicable local, State, and federal regulations regarding emergency access and wildland fire protection. The potential for a minor increase in demand for fire services may occur during construction or maintenance of the project; however, these minor public service demands would not overburden the existing fire protection services. Additionally, operation of the proposed project may increase individuals' access to telehealth, which could reduce the need for medical emergency response vehicles and demand for emergency response services. Therefore, the proposed project would not result in a substantial increase in demand for fire protection services beyond what was evaluated in the PEIR.

Police Protection

The project area currently receives police protection from the El Dorado County Sheriff's Department. The potential for a minor increase in demand for services may occur for police protection if a crime or accident occurs during construction or maintenance of the project. However, these minor public service demands would not overburden the Sheriff's Department. Therefore, the proposed project would not result in a substantial increase in demand for police protection services beyond what was evaluated in the PEIR.

Schools

The proposed project is located within the Black Oak Mine Unified School District; the nearest school to the project site is Georgetown Elementary School. As discussed in Section 5.XIV, *Population and Housing*, it is reasonable to assume that implementation of the proposed project would contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. However, the potential for this growth would be limited and would not induce substantial population growth in the County. Therefore, the proposed project would not generate any additional residential population that would create demand for additional schools or increase attendance or enrollment at existing schools. Additionally, implementation of the proposed project could increase individuals' access to virtual learning opportunities. Therefore, the proposed project would not result in a substantial increase in demand on school services beyond what was evaluated in the PEIR.

Parks

Recreational facilities within the project area are overseen by the Georgetown Divide Recreation District (GDRD). The nearest neighborhood park to the proposed project is Georgetown Park. As discussed in

Section 5.XIV, *Population and Housing*, implementation of the proposed project would contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. However, the potential for this growth would be limited and would not substantially induce the County population. As such, the proposed project would not generate an increased use of neighborhood or regional parks or other recreational facilities. Additionally, implementation of the proposed project would not include or require the construction or expansion of recreational facilities. Therefore, the proposed project would not result in a substantial increase in demand on parks beyond what was evaluated in the PEIR.

Other Public Facilities

As demonstrated above, the proposed project would not generate an increased need for public services, such as fire or police protection, schools, or parks. In addition, construction of the project would not physically alter existing government facilities such that service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, or other public facilities would be affected. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to public services impact would occur compared to what was evaluated in the PEIR. No mitigation measures related to public services were included in the PEIR.

XVI. RECREATION

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact REC-1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	NI	Impact REC-1, pp. 4.16-12	Yes	N/A	NI	No
Impact REC-2: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	NI	Impact REC-2, pp. 4.16-12	Yes	N/A	NI	No

[1]NI = No impact.

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

New Recreation Impacts: Would the project result in other impacts to recreation that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact REC-2: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impacts from the El Dorado County Broadband Fiber Project PEIR

No impact. The PEIR concluded that implementation of the individual fiber projects under the El Dorado County Broadband Fiber Project would not include or require the construction or expansion of recreational facilities. Therefore, the PEIR determined that no impact on recreation would occur for Impact REC-1 and REC-2.

Impacts from the Proposed Project

No new or substantially more severe impact. Recreational facilities within the project area are overseen by the GDRD. The nearest neighborhood park to the proposed project is Georgetown Park located at 3000 Harkness Street, Georgetown. The proposed project would include the installation of

broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within previously disturbed ROW and corridors and within existing easements. As discussed in Section 5.XIV, *Population and Housing*, implementation of the proposed project would contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. However, the potential for this growth would be very limited and would not substantially induce the County population. As such, the proposed project would not generate an increased use of neighborhood or regional parks or other recreational facilities. Additionally, implementation of the proposed project would not include or require the construction or expansion of recreational facilities. Therefore, no impact would occur as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to recreation would occur compared to what was evaluated in the PEIR. No mitigation measures related to recreation were included in the PEIR.

XVII. TRANSPORTATION

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
TRA-1: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	LTSM	Impact TRA-1, pp. 4.17-17 – 4.17-19	Yes	MM TRA-1	LTSM	No
TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	LTS	Impact TRA-2, pp. 4.17-19 – 4.17-20	Yes	N/A	LTS	No
TRA-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTSM	Impact TRA-3, pp. 4.17-20 – 4.17-21	Yes	MM TRA-1	LTSM	No
TRA-4: Result in inadequate emergency access?	LTSM	Impact TRA-4, pp. 4.17-21 – 4.17-22	Yes	MM TRA-1	LTSM	No

[1]LTSM = Less than significant impact with mitigation. LTS = Less than significant impact.
[2]N/A = not applicable; there are no MMs identified in the PEIR for this impact. None = there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Transportation Impacts: Would the project result in other impacts to transportation that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact TRA-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, with implementation of Mitigation Measure TRA-1, which requires preparation of a Traffic Control and Detour Plan, construction impacts would be less than significant. The PEIR determined that operation of the El Dorado County Broadband Fiber Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact.

Construction

The proposed project would include the installation of broadband infrastructure in the community of Georgetown. The broadband infrastructure would include the installation of underground fiber optic lines within previously disturbed ROW and corridors and within existing easements. Staging areas would be located along roadway cross-sections; however, the exact locations of staging areas and equipment lay-down areas would be determined during the final construction plans. Staging areas would be used to mobilize crews, and refueling would not take place in the field.

The proposed broadband infrastructure would include the installation of underground fiber optic lines in buried conduits within approximately 27.87 miles of previously disturbed ROW and corridors and existing easements. Portions of the project alignment would be located along SR 193 within Caltrans ROW. Construction of the proposed project may require temporary lane closures along roadways in the project alignment, which may have the potential to impede or interfere with emergency access routes or services. Coordination with local agencies for any necessary and temporary road closures would be required. Due to the location of the proposed project, an Encroachment Permit application would be submitted to the County Department of Transportation and Caltrans District 3 for review and approval prior to the start of construction. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along County and Caltrans ROW. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, the project would be required to develop and implement a Traffic Control and Detour Plan as outlined in Mitigation Measure TRA-1.

Operation

Operational activities for the proposed project would be limited to routine maintenance and emergencies. Infrastructure such as circuit cabinets with cooling fans and/or stand-by generators associated with the project may be routinely checked, as needed. Therefore, operation of the project would not conflict with any program, plan, ordinance, or policy concerning traffic circulation systems.

Impact Conclusion

With implementation of Mitigation Measure TRA-1, the impact would be less than significant and there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact TRA-2: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that construction of individual fiber projects under the proposed El Dorado County Broadband Fiber Project would be temporary and intermittent in nature and, therefore, would not result in a long-term increase in vehicular trips. Operation and maintenance of individual fiber projects would generate minimal worker vehicle trips and would not lead to a

substantial increase in VMT per capita within the County. Therefore, the impact on VMT was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The unincorporated areas of the County are subject to El Dorado County's VMT thresholds. According to the County General Plan Policy TC-Xe, a project would worsen the level of service conditions if a project would result in: A) two percent increase in traffic during a.m., p.m. peak hour, or daily; B) the addition of 100 or more daily trips; or C) the addition of 10 or more trips during the a.m. or p.m. peak hour. On October 6, 2020, the County BOS adopted Resolution 141-2020, which established the County VMT thresholds of significance for the purpose of analyzing transportation impacts under CEQA for land use projects. To be consistent with the County's General Plan Policy TC-Xe, Resolution 141-2020 concluded that projects that generate or attract fewer than 100 trips per day would result in a less than significant impact on VMT. Additionally, the *2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA* screening guidelines recommend that projects attracting fewer than 110 trips per day should be assumed to cause a less than significant impact on VMT.

Construction of the proposed project would be temporary and intermittent in nature and therefore would not result in a long-term increase in vehicular trips. Operational activities for the proposed project would be limited to routine maintenance and emergencies. Infrastructure such as circuit cabinets with cooling fans and/or stand-by generators associated with the proposed project may be routinely checked, as needed. Operation and maintenance of the proposed project would generate minimal worker vehicle trips, assumed to be fewer than 100 trips per day, and would not lead to a substantial increase in VMT per capita within the County. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact TRA-3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that with implementation of Mitigation Measure TRA-1, which requires preparation of a Traffic Control and Detour Plan, individual fiber projects under the El Dorado County Broadband Fiber Project would not introduce or increase hazards due to a geometric design features or incompatible uses. The impacts were determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. 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. As noted under Impact TRA-1, construction activities may require temporary lane closures. Due to the location of the proposed project, an Encroachment Permit application would be submitted to the County Department of Transportation and Caltrans District 3 for review and approval prior to the start of construction. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along County and Caltrans ROW. Coordination with the County Department of Transportation and Caltrans for any

necessary and temporary road closures along ROW 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, the project would be required to develop and implement a Traffic Control and Detour Plan as outlined in Mitigation Measure TRA-1. 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 County Department of Transportation and Caltrans District 3.

Once construction activities have ceased, any roads impacted by construction would be restored to preconstruction conditions. With implementation of Mitigation Measure TRA-1, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact TRA-4: Would the project result in inadequate emergency access?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that, in order 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. With implementation of Mitigation Measure TRA-1, potential impacts during construction were determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Implementation of the proposed project would introduce a wider and more reliable network throughout the community of Georgetown. The proposed 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. The project may also increase individuals' access to telehealth throughout the community of Georgetown, which could reduce the need for medical emergency response vehicles and demand for emergency response services.

Due to the location of the proposed project, an Encroachment Permit application would be submitted to the County Department of Transportation and Caltrans District 3 for review and approval prior to the start of construction. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along County and Caltrans ROW. To minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, the project would be required to develop and implement a Traffic Control and Detour Plan as outlined in Mitigation Measure TRA-1. Operational activities for the proposed project would be limited to routine maintenance and emergencies. Infrastructure such as circuit cabinets with cooling fans and/or stand-by generators associated with the project may be routinely checked, as needed. Therefore, with implementation of Mitigation Measure TRA-1, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

With implementation of Mitigation Measure TRA-1 from the PEIR, no new or substantially more severe impacts related to transportation would occur compared to what was evaluated in the PEIR. The following transportation MM included in the PEIR is applicable to the proposed project.

TRA-1: 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.

XVIII. TRIBAL CULTURAL RESOURCES

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	LTSM	Impact TCR-1, pp. 4.18-12 – 4.18-13	Yes	TCR-2	LTSM	No
TCR-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe	LTSM	Impact TCR-2, pp. 4.18-13 – 4.18-14	Yes	TCR-2	LTSM	No
Impact TCR-3: Cause a substantial adverse change in the significance of a tribal cultural resource inadvertently discovered during construction?	LTSM	Impact TCR-3, pp. 4.11-10	Yes	TCR-2	LTSM	No

[1]LSM = Less than significant impact with mitigation.

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

New Tribal Cultural Resource Impacts: Would the project result in other impacts to tribal cultural resources that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion

Impact TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Impacts from the El Dorado County Broadband Fiber Project PEIR

The El Dorado County Broadband Fiber Project PEIR concluded that implementation of Mitigation Measure TCR-1 would address unanticipated discoveries of tribal cultural resources (TCRs), and the proposed El Dorado County Broadband Fiber 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 Assembly Bill (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.

Impacts from the Proposed Project

No new or substantially more severe impact. Formal invitations to participate in AB 52 consultation on the proposed project were sent by the County as the Lead Agency to eight tribal representatives on May 7, 2025. The tribal representatives included:

- Sara Dutschke, Chairperson; Ione Band of Miwok Indians
- Cosme Valdez, Chairperson; Nashville Enterprise Miwok-Maidu-Nishinam Tribe
- Regina Cuellar, Chairperson; Shingle Springs Band of Miwok Indians
- Ben Cunningham-Summerfield; Tsi Akim Maidu
- Gene Whitehouse, Chairperson; United Auburn Indian Community of the Auburn Rancheria (UAIC)
- Darrel Cruz; Washoe Tribe of Nevada and California
- Herbert Griffin; Wilton Rancheria
- Dahlton Brown, Director of Administration; Wilton Rancheria

Each tribe was provided with a brief description of the project and its location, the contact information for the County's authorized representative, and a notification that the tribe has 30 days to request consultation. The County received a response from the Wilton Rancheria Cultural Preservation Department on May 14, 2025 stating that although the project is within the ancestral territory of the Wilton Rancheria, they do not have any comments and do not wish to open consultation at this time. The County also received a response from UAIC on June 10, 2025 and a response from the Shingle Springs Band of Miwok Indians on June 17, 2025, both requesting to formally initiate consultation. The County met with UAIC on December 11, 2025, to discuss the proposed project and have had ongoing meetings with both the Shingle Springs Band of Miwok Indians and UAIC. The County sent the cultural fieldwork maps to Shingle Springs Band of Miwok Indians and UAIC for the Tribes to review and provide their input prior to initiation of the fieldwork to be conducted by the project archaeologists. The markup of these fieldwork maps are confidential and on file with the County. No further responses have been received to date and therefore, Mitigation Measure TCR-1 has been satisfied.

As with any ground disturbing activity, inadvertent discovery of cultural resources, including TCRs, is possible. Without mitigation, the impact is potentially significant. In the event that TCRs are exposed during ground disturbing activities, Mitigation Measure TCR-2 would be implemented. During the tribal consultation process, UAIC provided the County with language to further clarify the procedures if existing or previously undiscovered TCRs, archaeological, or cultural resources are discovered during any future ground disturbing activities. This language is included as part of Mitigation Measure TCR-2 as it further clarifies the procedures to be followed in the event of the inadvertent discovery of TCRs during ground disturbing construction activities, consistent with the intent of Mitigation Measure TCR-2. UAIC also provided the County with a tribal monitoring sensitivity map that identified segments in red that will be monitored by a tribal representative from the UAIC; this sensitivity map is confidential and on file with the County. A tribal representative from the Shingle Springs Bank of Miwok Indians will monitor the remaining segments of the project alignment that will not be monitored by UAIC. The entire project alignment will be monitored by a tribal representative of either UAIC or Shingle Springs Bank of Miwok Indians.

Therefore, with implementation of Mitigation Measure TCR-2, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact TCR-2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The El Dorado County Broadband Fiber Project PEIR concluded that implementation of Mitigation Measure TCR-1 would address an adverse change in the

significance of TCRs, and the proposed El Dorado County Broadband Fiber Project's potential impacts to unknown TCRs would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. As described under Impact TCR-1 above, formal invitations to participate in AB 52 consultation on the proposed project were sent by the County to eight tribal representatives on May 7, 2025. The County received a response from the Wilton Rancheria Cultural Preservation Department on May 14, 2025 stating that although the project is within the ancestral territory of the Wilton Rancheria, they do not have any comments and do not wish to open consultation at this time. The County also received a response from UAIC on June 10, 2025 and a response from the Shingle Springs Band of Miwok Indians on June 17, 2025, both requesting to formally initiate consultation. The County met with UAIC on December 11, 2025, to discuss the proposed project and have had ongoing meetings with both the Shingle Springs Band of Miwok Indians and UAIC. The County sent the cultural fieldwork maps to Shingle Springs Band of Miwok Indians and UAIC for the Tribes to review and provide their input prior to initiation of the fieldwork to be conducted by the project archaeologists. The markup of these fieldwork maps are confidential and on file with the County. No further responses have been received to date and therefore, Mitigation Measure TCR-1 has been satisfied.

As with any ground disturbing activity, inadvertent discovery of cultural resources, including TCRs, is possible. In the event that TCRs are exposed during ground disturbing activities, Mitigation Measure TCR-2 would be implemented. During the tribal consultation process, UAIC provided the County with language to further clarify the procedures if existing or previously undiscovered TCRs, archaeological, or cultural resources are discovered during any future ground disturbing activities. This language is included as part of Mitigation Measure TCR-2 as it further clarifies the procedures to be followed in the event of the inadvertent discovery of TCRs during ground disturbing construction activities, consistent with the intent of Mitigation Measure TCR-2. UAIC also provided the County with a tribal monitoring sensitivity map that identified segments in red that will be monitored by a tribal representative from the UAIC; this sensitivity map is confidential and on file with the County. A tribal representative from the Shingle Springs Bank of Miwok Indians will monitor the remaining segments of the project alignment that will not be monitored by UAIC. The entire project alignment will be monitored by a tribal representative of either UAIC or Shingle Springs Bank of Miwok Indians.

Therefore, with implementation of Mitigation Measure TCR-2, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact TCR-3: Would the project cause a substantial adverse change in the significance of a tribal cultural resource inadvertently discovered during construction?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The El Dorado County Broadband Fiber Project PEIR concluded that implementation of Mitigation Measure TCR-2 would address unanticipated discoveries of TCRs, and the El Dorado County Broadband Fiber 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.

Impacts from the Proposed Project

No new or substantially more severe impact. Ground disturbance associated with the proposed project could result in inadvertent discovery of cultural resources, including TCRs. In the event that TCRs are exposed during ground disturbing activities, Mitigation Measure TCR-2 requires coordination with the consulting tribe that is culturally and geographically affiliated with the area to evaluate if the resource is a TCR. If the discovery is a TCR, Mitigation Measure TCR-2 requires additional work and mitigation measures such as those listed in PRC Section 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. UAIC also provided the County with a tribal monitoring sensitivity map that identified segments in red that will be monitored by a tribal representative from the UAIC; this sensitivity map is confidential and on file with the County. A tribal representative from the Shingle Springs Bank of Miwok Indians will monitor the remaining segments of the project alignment that will not be monitored by UAIC. The entire project alignment will be monitored by a tribal representative of either UAIC or Shingle Springs Bank of Miwok Indians.

Thus, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource inadvertently discovered during construction. With implementation of Mitigation Measure TCR-2, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

With implementation of Mitigation Measure TCR-2 from the PEIR, no new or substantially more severe impacts related to tribal cultural resources would occur compared to what was evaluated in the PEIR.

The following mitigation measure from the PEIR has been satisfied in the analysis of the projects impacts on the project site:

MM TCR-1: 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.

The following mitigation measure from the PEIR is applicable to the proposed project and has been amended in underline to include clarifying inadvertent discovery language provided by UAIC during the tribal consultation process conducted in accordance with Mitigation Measure TCR-1:

MM TCR-2: 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 Section 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.

Per the request from UAIC during the tribal consultation process, the following language shall be implemented if TCRs are discovered during ground disturbing construction activities:

Unanticipated Discoveries

- If any suspected TCRs or resources of cultural significance to UAIC, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist.

- A Tribal Representative and the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC §21074) and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary.

- The culturally affiliated Tribe shall consult with the Lead Agency to (1) identify the boundaries of the new TCR and (2) if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or 3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of TCRs will not take place unless approved in writing by the culturally affiliated Tribe.

- The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure

(locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.

- The construction contractor(s) and Lead Agency shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request.

- Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner.

- Work at the TCR discovery location shall not resume until authorization is granted by the Lead Agency in coordination with the culturally affiliated Tribe.

- If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials.

Tribal Monitoring

The project proponent or their construction contractor shall comply with the following measure to assist with identification of TCRs at the earliest possible time during project-related earthmoving activities:

- The project proponent shall contact the UAIC THPO (thpo@auburnrancheria.com) at least 2 months, if feasible, prior to project ground-disturbing activities to retain the services of a UAIC Certified Tribal Monitor(s). The duration of the construction schedule and Tribal Monitoring shall be determined at this time.

- A contracted Tribal Monitor(s) shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground-disturbing activities in the areas identified as sensitive (shown in red) in the tribal monitoring sensitivity map provided by UAIC and on-file with the County. All ground-disturbing activities in the sensitivity areas, including rebuild or previously disturbed, shall be subject to Tribal Monitoring unless otherwise determined unnecessary by the UAIC.

- Tribal Monitors or Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall be of an adequate duration for the Tribal Representative to examine the resource.

- Appropriate treatment of TCRs may include but is not limited to:

a. Recordation of the resource(s)

b. Avoidance and preservation of the resource(s)

c. Recovery and reburial of the resource(s) onsite or in a feasible off-site location in a designated area subject to no future disturbance. The location of the reburial shall be acceptable to the UAIC.

- To track the implementation of this measure, the Tribal Monitor(s) shall document field monitoring activities on a Tribal Monitor log.
- The Tribal Monitor(s) shall wear the appropriate safety equipment while on the construction site.
- The Tribal Monitor, in consultation with the UAIC THPO and the project proponent shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting Tribal Cultural Resources.
- In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24 hour business day notice, construction activities may proceed without tribal monitoring. At no time, regardless of the presence or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.
- The CEQA lead shall assist with resolution of disagreements between the project proponent/contractor and the Tribe if such occurs on the project.

Workers Awareness Training

- The Lead Agency shall require the applicant/Contractor to provide a Tribal Cultural Awareness and Sensitivity Training (training) for all personnel involved in project construction, including field consultants and construction workers, at their own expense. The training shall be developed in coordination with interested Native American Tribes.
- The training shall be conducted before any project-related construction activities begin at the project site. The training will include relevant information regarding sensitive cultural resources and tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The training will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential cultural resources or tribal cultural resources are encountered. The training will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values. The training may be done in coordination with the project archaeologist.

- All ground-disturbing equipment operators shall be required to receive the training and sign a form that acknowledges receipt of the training.

XIX. UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
Impact UTL-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	LTS	Impact UTL-1, pp. 4.19-14 – 4.19-15	Yes	N/A	LTS	No
Impact UTL-2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	Impact UTL-2, pp. 4.19-15 – 4.19-16	Yes	N/A	LTS	No
UTL-3: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	Impact UTL-3, pp. 4.19-16	Yes	N/A	LTS	No
UTL-4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTS	Impact UTL-4, pp. 4.19-16 – 4.19-18	Yes	N/A	LTS	No
UTL-5: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	LTS	Impact UTL-5, pp. 4.19-16 – 4.19-18	Yes	N/A	LTS	No

[1]LTS = Less than significant impact.

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

New Utilities and Service System Impacts: Would the project result in other impacts to utilities and service systems that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact UTL-1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the El Dorado County Broadband Fiber Project would not require the relocation or construction of new or expanded facilities that would cause significant environmental effects, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. The proposed fiber optic conduit would not require potable water for construction or operation of the project that could subsequently result in wastewater generation. As no wastewater would be generated, the proposed project would not exceed wastewater treatment requirements of the CVRWQCB. No new wastewater treatment facilities, or expansion of such facilities, would be required. Construction of project could involve minimal use of water for dust control per the EDCAQMD Rule 223-2, which would be readily available from existing sources. Operation of the project would not require additional water supplies as the project would not use water, and no new population would be generated. Therefore, no new water treatment or supply facilities would be required.

Construction of the project could occur in areas with existing stormwater drainage facilities. Once the underground fiber optic conduits are installed, the ground surface along the fiber optic line alignments would be restored to its previous condition (paved or unpaved). Therefore, the amount of pervious and impervious surfaces would not be significantly altered upon completion of the proposed project. As such, the proposed project would not require new or expanded stormwater facilities.

Additionally, fiber optic lines do not carry an electrical charge, instead they utilize light to transmit signals (Fluke Networks 2022). As such, installation of the underground fiber optic lines would not require significant use of electricity or natural gas, and no new or expanded electric power or natural gas utilities would be required.

Therefore, the proposed project would not require the relocation or construction of new or expanded facilities that would cause significant environmental effects. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact UTL-2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that the proposed El Dorado County Broadband Fiber Project would not result in additional water demand and would have sufficient water supplies available to serve the El Dorado County Broadband Fiber Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Construction of the proposed project could involve minor use of water for dust control per EDCAQMD Rule 223-2, which would be readily available from existing sources within the County. As discussed in Section 5.XIV, *Population and Housing*, it is reasonable to assume that implementation of the proposed project would contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. However, the potential for this growth would be limited and would not substantially increase the County population. Therefore, the operation of the proposed project would not require additional water supplies as no significant population increase would be generated. Therefore, the proposed project would not result in additional water demand and would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. The impact would be less than significant as the proposed project would not result in a *new or substantially more severe impact* compared to what was evaluated in the El Dorado County Broadband Fiber Project PEIR.

Impact UTL-3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The El Dorado County Broadband Fiber Project PEIR concluded that during construction, it is anticipated that portable toilets and drinking water supplies could be provided for workers. The minimal wastewater generated would be hauled to an approved facility for treatment/disposal. As wastewater associated with portable toilets would be a temporary and minimal demand, the proposed El Dorado County Broadband Fiber Project would not exceed wastewater treatment requirements of the CVRWQCB or the Lahontan RWQCB, and no new wastewater treatment facilities, or expansion of such facilities would be required. Additionally, no wastewater would be generated during operation of individual fiber projects. Therefore, the impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Construction and operation of the proposed project would not require potable water such that substantial wastewater generation would occur. During construction, it is anticipated that portable toilets and drinking water supplies could be provided for workers. The minimal wastewater generated would be hauled to an approved facility for

treatment/disposal. As wastewater associated with portable toilets would be a temporary and minimal demand, the proposed project would not exceed wastewater treatment requirements of the CVRWQCB, and no new wastewater treatment facilities, or expansion of such facilities would be required. Additionally, no wastewater would be generated during operation of the proposed project. Therefore, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact UTL-4: Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact UTL-5: Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded that implementation of individual fiber projects under the El Dorado County Broadband Fiber Project would not exceed State or local solid waste standards or infrastructure capacity, nor would they fail to comply with solid waste reduction goals. The impact for Impact UTL-4 and UTL-5 was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. CALGreen mandates locally permitted construction and demolition projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous construction and demolition debris generated during construction activities (CALGreen Sections 4.408, 5.408, 301.1.1 and 301.3). The El Dorado County Solid Waste and Hazardous Materials Division is responsible for the comprehensive planning of solid waste reduction, recycling, and resource recovery in El Dorado County, and is responsible for ensuring that solid waste disposal services meet State and federal mandates for integrated waste management. El Dorado Disposal distributes municipal solid waste to Forward Landfill in Stockton and Kiefer Landfill in Sacramento. Pursuant to the El Dorado County Environmental Management Solid Waste Division staff, both facilities have sufficient capacity to serve the County.

Construction of the proposed project would generate minimal solid waste, which is expected to include the packaging of fiber optic lines, asphalt, vegetation and debris removal, etc. Operation of the proposed project would not generate solid waste. Due to the minimal amount of solid waste generated by construction of the proposed project, the project would not adversely affect the applicable jurisdiction's abilities to comply with the State waste diversion requirements. Therefore, the proposed project would not exceed State or local solid waste standards or infrastructure capacity, nor would it fail to comply with solid waste reduction goals. The impact for Impact UTL-4 and UTL-5 would be less than significant as the proposed project would not result in a *new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

No new or substantially more severe impacts related to utilities and service systems would occur compared to what was evaluated in the PEIR. No mitigation measures related to utilities and service systems were included in the PEIR.

XX. WILDFIRE

Impact in the PEIR						
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR[1]	Identify Location of Impact Analysis in the PEIR	Is this Impact Within the Scope of the PEIR?	List MMs Applicable to the Project[2]	Identify Impact Significance for Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?
Would the project:						
FIRE-1: Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTSM	Impact FIRE-1, pp. 4.20-17 – 4.20-18	Yes	MM TRA-1	LTSM	No
FIRE-2: Due to slope, prevailing winds, and other factors, the project would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LTS	Impact FIRE-2, pp. 4.20-19	Yes	N/A	LTS	No
FIRE-3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	LTS	Impact FIRE-3, pp. 4.20-19 – 4.20-20	Yes	N/A	LTS	No
FIRE-4: Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LTS	Impact FIRE-4, pp. 4.20-20	Yes	N/A	LTS	No

[1]LTSM = Less than significant impact with mitigation. LTS = Less than significant impact.
[2]N/A = not applicable; there are no MMs identified in the PEIR for this impact. None = there are MMs identified in the PEIR for this impact, but none are applicable to the project.

New Wildfire Impacts: Would the project result in other impacts related to wildfire that are not evaluated in the El Dorado County Broadband Fiber Project PEIR?	☐ Yes	☒ No

Discussion:

Impact FIRE-1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact with mitigation. The PEIR concluded that, with implementation of Mitigation Measure TRA-1, which requires preparation of a Traffic Control and Detour Plan, individual fiber projects implemented under the El Dorado County Broadband Fiber Project would not impair

implementation of or physically interfere with an adopted emergency response plan, and the impact was determined be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. Implementation of the proposed project would introduce a wider and more reliable network throughout the community of Georgetown. The proposed 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. The project may also increase individuals' access to telehealth throughout the community, which could reduce the need for medical emergency response vehicles and demand for emergency response services.

Construction

Construction of the proposed project may require temporary lane closures on roadways within the project alignment, which could have the potential to impede or interfere with emergency access routes or services. Due to the location of the proposed project, an Encroachment Permit application would be submitted to the County Department of Transportation and Caltrans District 3 for review and approval prior to the start of construction. Standard traffic control measures, specified in a Traffic Control and Detour Plan, would be required for all construction activities along County and Caltrans ROW. As discussed in Section 5.IX, *Hazards and Hazardous Materials*, and Section 5.XVII, *Transportation,* to minimize or avoid lane closures that could interfere with traffic circulation during emergencies and disrupt access to private properties and roadways, the project would be required to develop and implement a Traffic Control and Detour Plan, as outlined in Mitigation Measure TRA-1.

Operation

Operational activities for the proposed project would be limited to routine maintenance and emergencies. Infrastructure such as circuit cabinets with cooling fans and/or stand-by generators associated with the project may be routinely checked, as needed.

Impact Conclusion

With implementation of Mitigation Measure TRA-1, the impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact FIRE-2: Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The concluded that the proposed El Dorado County Broadband Fiber Project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors. The impact would be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. As underground fiber optic lines would be located within previously disturbed ROW and corridors and within existing easements, the risk of localized ground failure is assumed to have already been minimized through previous grading, compaction, and use of engineered fills. Design and construction of the proposed project would be conducted in accordance with the CBC and other applicable engineering specifications and grading regulations that would further reduce the potential landslide risk in post-fire conditions. Additionally, prior to construction, preparation of a preliminary soils/geotechnical report would be required as part of the grading permit application process. All grading activities would comply with the *El Dorado County Grading, Erosion, and Sediment Control Ordinance*.

Numerous ordinances are implemented by the County to decrease the wildfire hazards in El Dorado County. Adherence to the CBC Chapter 7A, *Materials and Construction Methods for Exterior Wildfire Exposure*, and PRC Section 4291, requires property owners to maintain clearance of flammable vegetation of 100 feet from structures in order to reduce the risk of fire. The County MJHMP also identifies 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. Therefore, the proposed project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors. The impact would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact FIRE-3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant. The PEIR concluded that underground, or aboveground fiber optic lines would not exacerbate fire risk. Impacts related to fire risks from construction and operational activities were determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone maps, the proposed project is primarily within a State Responsibility Area (SRA) in areas mapped as Very High Fire Hazard *Severity* Zones (FHSZs) (CAL FIRE 2025). A portion of the northeast portion of the alignment is located within a Federal Responsibility Area (FRA). The primary potential fire hazards from construction of the proposed project would involve construction vehicles and equipment that could ignite dry vegetation and cause a fire, particularly during the drier, warmer months from June to October.

Construction activities that could result in sparks, such as welding or grinding, have a greater likelihood of creating a source of ignition than other construction-related activities than other activities. Numerous ordinances are implemented by the County to decrease the wildfire hazards in El Dorado County. Adherence to the CBC Chapter 7A, *Materials and Construction Methods for Exterior Wildfire Exposure*, and PRC Section 4291, requires property owners to maintain clearance of flammable vegetation of 100 feet from structures in order to reduce the risk of fire. The County MJHMP also identifies 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, construction workers would be trained in basic firefighting, and the availability of tools and training would allow construction crews to help control or extinguish fires they may come upon.

Once operation, buried conduits would not exacerbate fire risk as all infrastructure would be located underground. Additionally, fiber optic lines do not carry an electrical charge and are therefore not a source of heat (Fluke Networks 2022). Therefore, construction and operation of the proposed project would not exacerbate fire risk. Therefore, impacts would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Impact FIRE-4: Would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impacts from the El Dorado County Broadband Fiber Project PEIR

Less than significant impact. The PEIR concluded individual fiber projects implemented under the El Dorado County Broadband Fiber Project would not have the potential to exacerbate the risk of downstream flooding or landslides, and the impact was determined to be less than significant.

Impacts from the Proposed Project

No new or substantially more severe impact. As discussed in Impact FIRE-2, the design and construction of the proposed project would be conducted in accordance with the CBC and other applicable engineering specifications and grading regulations that would further reduce the potential landslide risk in post-fire conditions. Additionally, prior to construction, preparation of a preliminary soils/geotechnical report would be required as part of the grading permit application process. All grading activities would comply with the *El Dorado County Grading, Erosion, and Sediment Control Ordinance*.

As outlined in Section 5.X, *Hydrology and Water Quality*, the proposed project would be required to implement a SWPPP and BMPs for erosion control, which would reduce the potential flooding risk in post-fire conditions. Therefore, the potential for the proposed project to exacerbate the risk of downstream flooding or landslides would be less than significant as there would be *no new or substantially more severe impact* compared to what was evaluated in the PEIR.

Mitigation Measures from the El Dorado County Broadband Fiber Project

With implementation of Mitigation Measure TRA-1 from the PEIR, no new or substantially more severe impacts related to wildfire would occur compared to what was evaluated in the PEIR. MMs from the PEIR that are applicable to the proposed project are provided below.

TRA-1: 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.

6.0 PREPARERS

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Appendix A

Applicable Mitigation Measures

APPLICABLE MITIGATION MEASURES

INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21081.6, requires that a Mitigation Monitoring and Reporting Program (MMRP) be established upon completing findings. CEQA stipulates that "the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

The County is the Lead Agency for the Georgetown Broadband Fiber Project (project or proposed project) under CEQA and shall administer and implement the MMRP. The County is responsible for reviewing all monitoring reports, enforcement actions, and document disposition. The County shall rely on information provided by the project site observers/monitors (e.g., construction manager, project manager, biologist, archaeologist, etc.) as accurate and up-to-date and shall provide personnel to field check mitigation measure status, as required.

MMRP FORMAT AND IMPLEMENTATION

Mitigation measures that would reduce or eliminate potential environmental impacts of the proposed El Dorado County Broadband Fiber Project were identified in the PEIR MMRP. The following is a comprehensive list of all the mitigation measures from the PEIR that are applicable to the proposed project. The County is required to verify that all adopted mitigation measures are implemented properly and to ensure compliance, this MMRP (including the checklist) has been formulated. The MMRP shall be adopted, along with CEQA Findings, by the County (Lead Agency) and must be administered by County personnel. Specific responsibilities are delineated for each measure in the attached checklist table and these responsibilities may be delegated to qualified County staff or consultants.

The checklist in the following table is intended to be used by the applicant, grading/construction contractors, and personnel from the County, as the appointed mitigation implementation and monitoring entities. Information contained within the checklist clearly identifies each mitigation measure, defines the conditions required to verify compliance, and delineates the monitoring schedule. Following is an explanation of the columns that constitute each MMRP checklist.

Column 1 — *Mitigation Measure*: An inventory of each mitigation measure is provided.

Column 2 — *Monitoring Responsibility*: Identifies who is responsible for determining compliance with each mitigation measure (e.g., El Dorado County, construction contractor, individual fiber project applicant, qualified biologist, archaeologist).

Column 3 — *Implementation Schedule*: As scheduling is dependent upon the progression of the overall program, specific dates are not used within the "Schedule" column. Instead, scheduling describes a logical succession of events (e.g., prior to ground-disturbing activities, etc.) and, if necessary, delineates a follow-up program.

Column 4 — *Monitoring Compliance Record Name/Date*: Column is left blank and is to be signed and dated when compliance with the mitigation measure has been met.

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MITIGATION MONITORING AND REPORTING PROGRAM
El Dorado County Broadband Fiber Project

Mitigation Measure	Monitoring / Mitigation Timing	Reporting / Responsible Party	Verification of Compliance	
			Initials	Date
AIR QUALITY				
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 FDCP.	Prior to initiation of construction activities	Air Pollution Control Officer of the El Dorado County Air Quality Management District; El Dorado County; Project Applicant		
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	Prior to and during construction of individual fiber projects	Professional Geologist or Air Pollution Control Officer of the El Dorado County Air Quality Management District; Project Owner/Operator		

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.				
BIOLOGICAL RESOURCES				
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	Prior to start of construction on individual fiber projects.	Qualified Biologist, El Dorado County, Project Applicant		

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.				
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	Prior to and during construction activities for individual fiber projects.	Qualified Biologist, California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service, El Dorado County, Project Applicant		

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.				
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	Prior to and during construction activities for individual fiber projects.	Qualified Biologist, El Dorado County, Project Applicant		

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.				
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	Prior to and during construction activities occurring during the breeding season (February 1 through August 31) for individual fiber projects.	Qualified Biologist, El Dorado County, Project Applicant		

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 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 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.				
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 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 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 area.	Within 7 days prior to and during construction activities for individual fiber projects.	Qualified Biologist, El Dorado County, Project Applicant		
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 applicant of an individual fiber project shall apply for any necessary permits from the United States	Prior to approval of individual fiber projects	United States Army Corps of Engineers, California Department of Fish and Wildlife and/or Regional Water Quality Control Board, Project Applicant		

Army Corps of Engineers (USACE), the California Department of Fish and Wildlife (CDFW), and the Regional Water Quality Control Board (RWQCB) (e.g., Section 401/404 permits, CDFW Lake or Streambed Alteration Agreement, etc.) prior to approval. If necessary, a formal delineation of wetlands and "other waters" of the U.S. shall be prepared in accordance with 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.				
BIO-10: Oak Resources Inventory If it is determined during the biological resources assessment that an individual fiber project will result in impacts to oak resources, depending on the location of an individual fiber project, the County, incorporated cities, or the Tahoe Regional Planning Agency (TRPA) may require mitigation for impacts to oak resources or regulated individual oak trees. Depending on the location of the individual fiber project, the County Community Planning and Building Department, City of Placerville Planning Division, City of South Lake Tahoe Planning Division, or TRPA may require an inventory of prematurely removed trees or canopy cover to determine the extent of the loss prior to approval of the individual fiber project. 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 County Community Planning and Building Department, City of Placerville Planning Division, City of South Lake Tahoe Planning Division, or TRPA. Resource professionals may include botanists, ecologists, wildlife biologists, and foresters.	Prior to approval of individual fiber projects	Qualified Botanists/ Ecologist/ Wildlife Biologist/ Forester, El Dorado County Community Planning and Building Department, City of Placerville Planning Division, City of South Lake Tahoe Planning Division, Tahoe Regional Planning Agency		
CULTURAL RESOURCES				
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	Immediately upon discovery of archaeological cultural resources	Qualified Archaeologist, El Dorado County		

during the remainder of construction, a consulting archaeologist who meets the Secretary of the Interior's *Professional Qualifications Standards* for archaeology shall collaborate with the Tribes and 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.				
NOISE				
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.	Prior to issuing individual project construction permits	Project Applicant, Construction Contractor, El Dorado County		
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 105 feet from any noise sensitive land use (NSLU; e.g., residences, schools, hospitals, convalescent homes, churches, libraries). If it is not feasible to locate emergency generators 105 feet or more from all NSLUs, the project proponent shall incorporate noise attenuating features (e.g., generator sound enclosures, noise barriers) into the equipment installation sufficient to reduce generator noise levels to 55 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.	Prior to approval of individual fiber projects	El Dorado County		
NOI-3: Vibratory Roller Use Prior to issuing individual fiber project construction approvals or permits,	Prior to issuing individual fiber project construction permits	El Dorado County		

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.				
TRANSPORTATION				
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.	Prior to issuing individual fiber project encroachment permit	El Dorado County, Caltrans		
TRIBAL CULTURAL RESOURCES				
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	Immediately upon discovery	Tribal Organization Consulting on the find		

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. Per the request from UAIC during the tribal consultation process, the following language shall be implemented if TCRs are discovered during ground disturbing construction activities: **Unanticipated Discoveries** • If any suspected TCRs or resources of cultural significance to UAIC, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. • A Tribal Representative and the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC §21074) and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary. • The culturally affiliated Tribe shall consult with the Lead Agency to (1) identify the boundaries of the new TCR and (2) if feasible,				

identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or 3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of TCRs will not take place unless approved in writing by the culturally affiliated Tribe. • The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored. • The construction contractor(s) and Lead Agency shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request. • Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner. • Work at the TCR discovery location shall not resume until authorization is granted by the Lead Agency in coordination with the culturally affiliated Tribe.				

• If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials. **Tribal Monitoring** The project proponent or their construction contractor shall comply with the following measure to assist with identification of TCRs at the earliest possible time during project-related earthmoving activities: • The project proponent shall contact the UAIC THPO (thpo@auburnrancheria.com) at least 2 months, if feasible, prior to project ground-disturbing activities to retain the services of a UAIC Certified Tribal Monitor(s). The duration of the construction schedule and Tribal Monitoring shall be determined at this time. • A contracted Tribal Monitor(s) shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground-disturbing activities in the areas identified as sensitive (shown in red) in the tribal monitoring sensitivity map provided by UAIC and on-file with the County. All ground-disturbing activities in the sensitivity areas, including rebuild or previously disturbed, shall be subject to Tribal Monitoring unless otherwise determined unnecessary by the UAIC. • Tribal Monitors or Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within				

100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall be of an adequate duration for the Tribal Representative to examine the resource. • Appropriate treatment of TCRs may include but is not limited to: a. Recordation of the resource(s) b. Avoidance and preservation of the resource(s) c. Recovery and reburial of the resource(s) onsite or in a feasible off-site location in a designated area subject to no future disturbance. The location of the reburial shall be acceptable to the UAIC. • To track the implementation of this measure, the Tribal Monitor(s) shall document field monitoring activities on a Tribal Monitor log. • The Tribal Monitor(s) shall wear the appropriate safety equipment while on the construction site. • The Tribal Monitor, in consultation with the UAIC THPO and the project proponent shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting Tribal Cultural Resources. • In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24 hour business day notice, construction activities may proceed without tribal monitoring. At no				

time, regardless of the presence or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected. • The CEQA lead shall assist with resolution of disagreements between the project proponent/contractor and the Tribe if such occurs on the project. **Workers Awareness Training** • The Lead Agency shall require the applicant/Contractor to provide a Tribal Cultural Awareness and Sensitivity Training (training) for all personnel involved in project construction, including field consultants and construction workers, at their own expense. The training shall be developed in coordination with interested Native American Tribes. • The training shall be conducted before any project-related construction activities begin at the project site. The training will include relevant information regarding sensitive cultural resources and tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The training will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential cultural resources or tribal cultural resources are encountered. The training will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values. The training may be done in coordination with the project archaeologist.				

• All ground-disturbing equipment operators shall be required to receive the training and sign a form that acknowledges receipt of the training.				

Appendix B

Database Queries

Selected Elements by Element Code

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Greenwood (3812088) OR Lake Combie (3912111) OR Auburn (3812181) OR Colfax (3912018) OR Foresthill (3912017) OR Georgetown (3812087) OR Pilot Hill (3812171) OR Coloma (3812078) OR Garden Valley (3812077))

Element Code	Species	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
AAABH01022	***Rana draytonii*** California red-legged frog	Threatened	None	G2G3	S2S3	SSC
AAABH01053	***Rana boylii pop. 3*** foothill yellow-legged frog - north Sierra DPS	None	Threatened	G3T2	S2	
AAABH01055	***Rana boylii pop. 5*** foothill yellow-legged frog - south Sierra DPS	Endangered	Endangered	G3T2	S2	
ABNKC10010	***Haliaeetus leucocephalus*** bald eagle	Delisted	Endangered	G5	S3	FP
ABNKC12061	***Astur atricapillus*** American goshawk	None	None	G5	S3	SSC
ABNKD06071	***Falco peregrinus anatum*** American peregrine falcon	Delisted	Delisted	G4T4	S3S4	
ABNUA01010	***Cypseloides niger*** black swift	None	None	G4	S3	SSC
ABPAU08010	***Riparia riparia*** bank swallow	None	Threatened	G5	S3	
ABPBXB0020	***Agelaius tricolor*** tricolored blackbird	None	Threatened	G1G2	S2	SSC
AFCHA0209K	***Oncorhynchus mykiss irideus pop. 11*** steelhead - Central Valley DPS	Threatened	None	G5T2Q	S2	SSC
AMACC01020	***Myotis yumanensis*** Yuma myotis	None	None	G5	S4	
AMACC02010	***Lasionycteris noctivagans*** silver-haired bat	None	None	G4	S3S4	
AMACC08010	***Corynorhinus townsendii*** Townsend's big-eared bat	None	None	G4	S2	SSC
AMACC10010	***Antrozous pallidus*** pallid bat	None	None	G4	S3	SSC
AMAFJ01010	***Erethizon dorsatum*** North American porcupine	None	None	G5	S3	
AMAJF01020	***Pekania pennanti*** Fisher	None	None	G5	S2S3	SSC
ARAAD02031	***Actinemys marmorata*** northwestern pond turtle	Proposed Threatened	None	G2	SNR	SSC
ARACF12100	***Phrynosoma blainvillii*** coast horned lizard	None	None	G4	S4	SSC
IICOL48011	***Desmocerus californicus dimorphus*** valley elderberry longhorn beetle	Threatened	None	G3T3	S3	

Element Code	Species	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
IICOL58010	***Atractelmis wawona*** Wawona riffle beetle	None	None	G3	S1S2	
IIHYM24252	***Bombus occidentalis*** western bumble bee	None	Candidate Endangered	G3	S1	
IIHYM24260	***Bombus pensylvanicus*** American bumble bee	None	None	G3G4	S2	
IIHYM24380	***Bombus caliginosus*** obscure bumble bee	None	None	G2G3	S1S2	
IIHYM24460	***Bombus morrisoni*** Morrison bumble bee	None	None	G3	S1S2	
IIHYM24480	***Bombus crotchii*** Crotch's bumble bee	None	Candidate Endangered	G2	S2	
IIHYM35210	***Andrena subapasta*** An andrenid bee	None	None	G1G2	S1S2	
IIMEC07010	***Orobittacus obscurus*** gold rush hanging scorpionfly	None	None	G1	S1	
IIPLE23020	***Cosumnoperla hypocrena*** Cosumnes stripetail	None	None	G2	S2	
IITRI19080	***Rhyacophila spinata*** spiny rhyacophilan caddisfly	None	None	G1G2	S3	
ILARA14020	***Banksula californica*** Alabaster Cave harvestman	None	None	GH	SH	
ILARA14040	***Banksula galilei*** Galile's cave harvestman	None	None	G1	S1	
IMBIV27020	***Margaritifera falcata*** western pearlshell	None	None	G3G4	S1S2	
IMGASB0010	***Ammonitella yatesii*** tight coin (=Yates' snail)	None	None	G1	S1	
PDAST11061	***Balsamorhiza macrolepis*** big-scale balsamroot	None	None	G2	S2	1B.2
PDAST8H1V0	***Packera layneae*** Layne's ragwort	Threatened	Rare	G2	S2	1B.2
PDAST9X0D0	***Wyethia reticulata*** El Dorado County mule ears	None	None	G2	S2	1B.2
PDCIS020F0	***Crocanthemum suffrutescens*** Bisbee Peak rush-rose	None	None	G2?Q	S2?	3.2
PDCON040H0	***Calystegia stebbinsii*** Stebbins' morning-glory	Endangered	Endangered	G1	S1	1B.1
PDCON040Q0	***Calystegia vanzuukiae*** Van Zuuk's morning-glory	None	None	G2Q	S2	1B.3
PDCPR07080	***Viburnum ellipticum*** oval-leaved viburnum	None	None	G4G5	S3	2B.3

Element Code	Species	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
PDERI040V0	***Arctostaphylos nissenana*** Nissenan manzanita	None	None	G1	S1	1B.2
PDFAB25101	***Lathyrus sulphureus var. argillaceus*** dubious pea	None	None	G5T1T2Q	S1S2	3
PDONA05053	***Clarkia biloba ssp. brandegeeae*** Brandegee's clarkia	None	None	G4G5T4	S4	4.2
PDRHA04190	***Ceanothus roderickii*** Pine Hill ceanothus	Endangered	Rare	G1	S1	1B.1
PDROS0W0C0	***Horkelia parryi*** Parry's horkelia	None	None	G2	S2	1B.2
PDRUB0N0E7	***Galium californicum ssp. sierrae*** El Dorado bedstraw	Endangered	Rare	G5T1	S1	1B.2
PMCYP03M00	***Carex cyrtostachya*** Sierra arching sedge	None	None	G2	S2	1B.2
PMCYP03M60	***Carex xerophila*** chaparral sedge	None	None	G2	S2	1B.2
PMCYP0N080	***Rhynchospora capitellata*** brownish beaked-rush	None	None	G5	S2	2B.2
PMLIL022V0	***Allium jepsonii*** Jepson's onion	None	None	G2	S2	1B.2
PMLIL0G020	***Chlorogalum grandiflorum*** Red Hills soaproot	None	None	G3	S3	4.2
PMLIL0V060	***Fritillaria eastwoodiae*** Butte County fritillary	None	None	G3Q	S3	3.2
PMPOA4Z310	***Poa sierrae*** Sierra blue grass	None	None	G3	S3	1B.3

Record Count: 53

CALIFORNIA NATIVE PLANT SOCIETY

CNPS Rare Plant Inventory

Search Results

18 matches found. Click on scientific name for details

Search Criteria: , CRPR is one of [**1A:1B:2A:2B:3**] , Fed List is one of [**FE:FT:FC:None**] **or** State List is one of [**CE:CT:CR:CC:None**] , 9-Quad include [**3912017:3912018:3812077:3812078:3812088:3812087:3812181:3912111:3812171**]

▲ SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFEFORM	BLOOMING PERIOD	FED LIST	STATE LIST	GLOBAL RANK	STATE RANK	CA RARE PLANT RANK	CA ENDEMIC	DATE ADDED	PHOTO
Allium jepsonii	Jepson's onion	Alliaceae	perennial bulbiferous herb	Apr-Aug	None	None	G2	S2	1B.2	Yes	1994-01-01	 © 2019 Steven Perry
Arctostaphylos nissenana	Nissenan manzanita	Ericaceae	perennial evergreen shrub	Feb-Mar	None	None	G1	S1	1B.2	Yes	1974-01-01	 David Graber
Balsamorhiza macrolepis	big-scale balsamroot	Asteraceae	perennial herb	Mar-Jun	None	None	G2	S2	1B.2	Yes	1974-01-01	 ©1998 Dean Wm. Taylor
Calystegia stebbinsii	Stebbins' morning-glory	Convolvulaceae	perennial rhizomatous herb	Apr-Jul	FE	CE	G1	S1	1B.1	Yes	1980-01-01	 Steven Perry
Calystegia vanzuukiae	Van Zuuk's morning-glory	Convolvulaceae	perennial rhizomatous herb	May-Aug	None	None	G2Q	S2	1B.3	Yes	2014-07-16	No Photo Available
Carex cyrtostachya	Sierra arching sedge	Cyperaceae	perennial herb	May-Aug	None	None	G2	S2	1B.2	Yes	2015-08-18	No Photo Available

Carex xerophila	chaparral sedge	Cyperaceae	perennial herb	Mar-Jun	None	None	G2	S2	1B.2	Yes	2016-06-06	 © 2023 Steven Perry
Ceanothus roderickii	Pine Hill ceanothus	Rhamnaceae	perennial evergreen shrub	Apr-Jun	FE	CR	G1	S1	1B.1	Yes	1974-01-01	 © 2018 Steven Perry
Crocanthemum suffrutescens	Bisbee Peak rush-rose	Cistaceae	perennial evergreen shrub	Apr-Aug	None	None	G2?Q	S2?	3.2	Yes	1974-01-01	No Photo Available
Fritillaria eastwoodiae	Butte County fritillary	Liliaceae	perennial bulbiferous herb	Mar-Jun	None	None	G3Q	S3	3.2		1974-01-01	 ©2009 Sierra Pacific Industries
Galium californicum ssp. *sierrae*	El Dorado bedstraw	Rubiaceae	perennial herb	May-Jun	FE	CR	G5T1	S1	1B.2	Yes	1974-01-01	 © 2019 John Doyen
Horkelia parryi	Parry's horkelia	Rosaceae	perennial herb	Apr-Sep	None	None	G2	S2	1B.2	Yes	1974-01-01	 © 2009 Barry Breckling
Lathyrus sulphureus var. *argillaceus*	dubious pea	Fabaceae	perennial herb	Apr-May	None	None	G5T1T2Q	S1S2	3	Yes	1994-01-01	No Photo Available
Packera layneae	Layne's ragwort	Asteraceae	perennial herb	Apr-Aug	FT	CR	G2	S2	1B.2	Yes	1974-01-01	 Steve Tyron
Poa sierrae	Sierra blue grass	Poaceae	perennial rhizomatous herb	Apr-Jul	None	None	G3	S3	1B.3	Yes	2010-06-10	 © 2012 Belinda Lo

Rhynchospora capitellata	brownish beaked-rush	Cyperaceae	perennial herb	Jul-Aug	None	None	G5	S2	2B.2		1974-01-01	 ©2004 Dean Wm. Taylor
Viburnum ellipticum	oval-leaved viburnum	Viburnaceae	perennial deciduous shrub	May-Jun	None	None	G4G5	S3	2B.3		1974-01-01	 © 2006 Tom Engstrom
Wyethia reticulata	El Dorado County mule ears	Asteraceae	perennial herb	Apr-Aug	None	None	G2	S2	1B.2	Yes	1974-01-01	 Steven Perry

Showing 1 to 18 of 18 entries

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To: 10/21/2025 21:58:13 UTC
Project Code: 2026-0007078
Project Name: Georgetown Broadband Fiber Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
(916) 414-6600

PROJECT SUMMARY

Project Code: 2026-0007078
Project Name: Georgetown Broadband Fiber Project
Project Type: New Constr - Below Ground
Project Description: Broadband Fiber
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@38.919504450000005,-120.87031083515836,14z



Counties: El Dorado County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Gray Wolf *Canis lupus* Population: U.S.A.: All of AL, AR, CA, CO, CT, DE, FL, GA, IA, IN, IL, KS, KY, LA, MA, MD, ME, MI, MO, MS, NC, ND, NE, NH, NJ, NV, NY, OH, OK, PA, RI, SC, SD, TN, TX, VA, VT, WI, and WV; and portions of AZ, NM, OR, UT, and WA. Mexico. There is **final** critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/4488	Endangered

BIRDS

NAME	STATUS
California Spotted Owl *Strix occidentalis occidentalis* Population: Sierra Nevada No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/7266	Proposed Threatened

REPTILES

NAME	STATUS
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
California Red-legged Frog *Rana draytonii* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2891	Threatened
Foothill Yellow-legged Frog *Rana boylii* Population: South Sierra Distinct Population Segment (South Sierra DPS) There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5133	Endangered

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Layne's Butterweed *Senecio layneae*	Threatened

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/4062

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

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State: CA
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