Print Form

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: 2019049174

Project Title: Olinda Last Mile Underserved Broadband Project

Lead Agency: California Public Utilities Commission

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Project Location: Igo, CA (*City*) Shasta County (*County*)

Project Decription (Proposed actions, location, and/or consequences).

The proposed project involves the construction of a second-generation, very-high-bit-rate digital subscriber line (VDSL2) fiber-optic network capable of 25 Mps/5 Mps (megabit-per-second download/upload) speed. Approximately 24.6 km (15.3 miles) of new fiber-optic cable would be buried within protective conduit along existing roads in southwestern Shasta County.

The proposed project is partly funded by the California Advance Services Fund (CASF). On December 20, 2007, in CPUC Decision 07-12-054, the CASF program to provide grants that support projects that will

a) Provide broadband services to areas currently without broadband access, and

b) Build out facilities in underserved areas, if funds are still available.

CPUC Resolution T-17411 approved funding in the amount of $1,833,689 from the CASF for the proposed project. Additional funding of $399,853.20 or $469,978 to complete the proposed project was approved in CPUC Resolution T-17517.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

There are no Significant and Unavoidable impacts associated with the project. The project may, however, cause potentially significant impacts that may be reduced through Applicant Proposed Measures (APMs) and Mitigation Measures (MMs). A list of project-specific APMs and MMs associated with the potentially significant impacts to the following resource area topics is included in Summary Form Attachment 1.

Biological Resources
Cultural Resources
Geology and Soils
Hazards and Hazardous Materials
Hydrology and Water Quality
Noise and Vibration
Transportation and Traffic
Tribal Cultural Resources

Revised September 2011

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Cultural Resources and Tribal Cultural Resources

Provide a list of the responsible or trustee agencies for the project.

California Public Utilities Commission
Shasta County Department of Public Works
Shasta County Department of Resource Management, Planning Division
Air Quality Management District, Shasta County
Shasta Mosquito and Vector Control District
Northeast Center of the California Historical Resources Information Center
Shasta County Fire Department, Shasta-Trinity Unit

Summary Form
Attachment 1

Introduction

The proposed TDS Telecom Olinda Last Mile Underserved Broadband Project is located approximately 11 miles south of the City of Redding in Shasta County, California, and includes components spanning 24.6 km (15.3 miles) throughout the unincorporated communities of Olinda, Igo, and Happy Valley, all located west of the City of Anderson and the Sacramento River. The proposed project involves the construction of a second-generation fiber-optic network capable of 25 Mps/5 Mps (megabit-per-second download/upload) speed. The network would be comprised of new fiber-optic cables that would be buried within protective conduit along existing County roads, and would provide high-speed broadband internet service to currently underserved areas in Shasta County to help meet customer demands. The proposed project would be completed with the financial assistance of a California Advanced Services Fund (CASF) grant.

As part of the project description, the applicant (TDS Telecom) has proposed Applicant Proposed Measures (APMs) that would be implemented as part of project construction and operations, and that are intended to reduce potential project-related impacts. In cases in which the proposed APM does not fully reduce the potential for a significant impact to a resource, supplemental Mitigation Measures (MMs) have been developed. Following a CEQA review of the proposed project and APMs, it has been determined that incorporation of the APMs and supplemental MMs would reduce all potential project-related impacts to less than significant levels. The APMs and MMs that would reduce these impacts from potentially significant to less than significant levels for the resource areas listed on Page 1 of the Summary Form are briefly summarized in Table 1 below. For a list of all complete Draft IS/MND APM and MM language, including APMs and MMs not summarized in Table 1, please refer to Chapter 6.0 MMRP of the Draft IS/MND.

The ensure that the applicant complies with all proposed APMs described in Table 1 and the MMRP, **MM GEN-1**, as defined below, would apply broadly across all resource areas and project phases:

> ***MM GEN-1: Implementation of All APMs.*** *The applicant shall implement all APMs as stated in this environmental document, except in cases where they are superseded by mitigation measures. The APMs shall be incorporated into the Mitigation, Monitoring, and Reporting Plan.*

Table 1: Summary of APMs and MMs Described in the Summary Form[1]

IS/MND Section	Measure	Summary of Measure (refer to MMRP for full measure language)
Air Quality	APM AQ-1	To minimize fugitive PM10 emissions during project construction, the applicant shall stabilize stored materials, suppress dust by spraying water or chemical stabilizers, promptly clean track-outs if they occur, and restrict construction vehicle speed to no more than 15 miles per hour on unpaved surfaces.
Biological Resources	APM BIO-1	All waterways and wetlands in the project area will be bored beneath and avoided during construction.
	APM BIO-2	Bore pits will be placed a minimum distance of 5 m (16 feet) beyond either the top of waterway banks or the maximum extent of any vegetation present along the waterways' margins.
	APM BIO-3	Bore pits will be placed a minimum distance of 76 m (250 feet) beyond either the edge of seasonal wetlands or the maximum extent of any vegetation present along the wetlands' margins.
	APM BIO-4	The applicant will develop and incorporate a comprehensive Stormwater Pollution Prevention Plan (SWPPP), including appropriate Best Management Practices (BMPs) to prevent sediment transport resulting from ground disturbance.
	APM BIO-5	All orchards will be avoided during construction.
	APM BIO-6	No trees will be removed during project construction, and vegetation trimming, if required, will be minimized.
	MM BIO-1	Construction activities that would occur during Nesting Bird Season (February 1-August 31) must implement appropriate monitoring strategies, buffer limits, surveys, and other appropriate avoidance strategies to eliminate the potential for impacts to bird nests.
Cultural Resources	APM CR-1	Happy Valley Ditch will be avoided via subsurface boring.
	APM CR-2	Cloverdale Cemetery and the Igo Inn will be avoided by rerouting the fiber-optic lines to the opposite side of the road.
	APM CR-3	In the event that undiscovered historical or archaeological resources are encountered by construction personnel, all ground-disturbing activities within 30.5 m (100.0 feet) of the find in non-urban areas and 15.2 m (50.0 feet) in urban areas will be temporarily halted or diverted and a qualified archaeologist will be contacted to assess the discovery.
	APM CR-4	If human remains are discovered or recognized in any location, construction personnel will suspend further excavation or disturbance of the site and any nearby areas reasonably suspected to overlie adjacent human remains until the County coroner has been informed and has determined that no investigation of the cause of death is required.
	APM CR-5	In the event that fossil remains are encountered by construction personnel, qualified paleontological specialists will be contacted. Construction within 30.5 m (100.0 feet) of the find in non-urban areas and 15.2 m (50.0 feet) in urban areas will be temporarily halted or diverted until a qualified vertebrate paleontologist examines the discovery.
	MM CUL-1	The applicant will design and implement a Worker Education Program that requires training for all project personnel. The Worker Education Program would give all project personnel an overview of the following: prehistoric and historic architectural and archaeological artifacts in the proposed project area, discussions of procedures to be followed in the event that unanticipated cultural resources or human remain are discovered, and discussions of disciplinary actions that could be taken against personnel violating historic preservation laws and TDS policies.
	MM CUL-2	A CPUC-approved archaeologist shall monitor the effects of all construction-related work conducted within locations with the potential to contain previously unidentified cultural resources and within 200 feet of the known archaeological resources.
	MM CUL-3	TDS shall immediately halt and exclude construction work within 100 feet of the discovery of an unanticipated cultural resource, and the CPUC-approved archaeologist shall inspect the unanticipated resource. At the request of the CPUC-

		approved archaeologist, TDS shall install protective barriers with signage identifying the exclusion area as an "environmentally sensitive area."
	MM CUL-4	Prior to construction, TDS shall compare the limits of the proposed areas of disturbance to the portion of the proposed project area for which a Class III Cultural Resources Survey has been prepared. TDS then shall verify that all proposed areas of disturbance for the proposed project have been surveyed at the Class III Cultural Resources Survey level. TDS shall provide this verification, consisting of a written statement and accompanying project maps, to the CPUC for review and approval. Notification also will be sent as a courtesy to the Wintu.
	MM CUL-5	In the event of the discovery or recognition of human remains during construction, TDS shall ensure there is no further excavation or disturbance of the site or any nearby area. TDS shall follow procedures pursuant to California PRC Section 5097.98(b) and the CPUC shall be notified within 24 hours of receiving notification of the landowner's, or the person responsible for the excavation work's, decision for the final treatment or disposition of the human remains and associated grave goods.
Geology and Soils	APM GEO-1	Contractors will manage construction-induced sediment and excavated spoils in accordance with applicable State Water Resources Control Board (SWRCB), U.S. Environmental Protection Agency (EPA), and National Pollutant Discharge Elimination System (NPDES) permits.
	APM GEO-2	Prior to the onset of construction, TDS or its authorized contractor will complete a SWPPP that outlines BMPs to control discharges from construction areas.
	APM GEO-3	No construction-related materials, wastes, spills, or residues will be discharged from the project.
	APM GEO-4	The staging of construction materials, equipment, and excavation spoils will be performed outside of drainages.
	APM GEO-5	Excavated or disturbed soil will be stored and contained in a controlled area. Containment BMPs map include silt fence, hay bales, straw wattles, or similarly effective erosion control techniques.
	APM GEO-6	All stockpiled material will be covered or contained in such a way that off-site runoff is eliminated.
Hazards and Hazardous Materials	APM HAZ-1	All hazardous materials will be labelled, stored, and handled in accordance with BMPs and OSHA requirements.
	APM HAZ-2	All employees shall be properly trained in the use and handling of hazardous materials.
	APM HAZ-3	Any small quantities of hazardous materials stored temporarily in staging areas will be stored on pallets within fenced and secured areas and protected from exposure to weather.
	APM HAZ-4	All hazardous waste materials removed during construction will be handled and disposed of by a licensed waste disposal contractor and transported by a licensed hauler to an appropriately licensed and permitted disposal or recycling facility.
	APM HAZ-5	Spill clean-up kits will be on-site during construction, and equipment would remain in good working order to prevent spills. Hazardous spills will be reported to the appropriate agencies.
	APM HAZ-6	Workers shall be trained in the danger of wildland fires. Training will include prevention strategies, such as parking equipment in areas without dry, brushy vegetation. All work vehicles shall be equipped with working a fire extinguisher. All cigarettes and trash shall be disposed of in proper containers and taken off site at the end the day.
Noise and Vibration	APM NOI-1	All construction equipment operation shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Friday.
	MM NOI-1	The applicant shall provide written notice to residences and landowners located within 50 feet of proposed project alignment at least within five days of commencement of construction activities at the street where works will occur. The notice shall state the date of planned construction activity in proximity to that landowner's property and the range of hours during which maximum noise levels may be anticipated.
	APM TRA-1	The project contractor to obtain all necessary local road encroachment permits prior to construction.

Transportation and Traffic	APM TRA-2	If necessary to comply with encroachment permit requirements, the applicant may prepare a traffic control plan.
	APM TRA-3	The applicant shall develop circulation/detour plans (signing flagging, etc.) to minimize local street circulation impacts.
	APM TRA-5	The applicant will limit lane closures during peak hours to the extent possible.
	APM TRA-7	Installed traffic control devices will comply with the requirements specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance
	MM TRA-1	The applicant shall take photos to document roadway conditions along the project alignment before and after project construction. The applicant shall repair any roads damaged by project vehicle traffic to pre-project conditions.
	MM TRA-2	The applicant shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of lane closures at least one week prior to the closure. Notification shall include the location, date, time, and duration of the lane closure. The applicant shall make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers.
Tribal Cultural Resources	MM TCR-1	One Native American monitor from the Wintu Tribe shall be retained, at the Tribe's option, to observe ground-disturbing activities and all work within 200 feet of the Cloverdale Cemetery, subject to the conditions outlined in this mitigation measure.
	MM TCR-2	In the event a resource is discovered that, in the opinion of the CPUC-approved archaeologist, may be considered a tribal cultural resource or a resource of importance to the Wintu Tribe, TDS shall notify the CPUC Project Manager (PM) and Wintu Tribe (Wintu AB 52 or cultural representative) within 24 hours of its discovery. As part of the notification, the resource will be described with sufficient detail to allow the CPUC PM/Wintu AB 52 or cultural representative an understanding of the resource. If the find is potentially significant, the procedures outlined in this mitigation measure will be implemented.

Notes:

[1]For a list of all APMs and MMs, as well as the complete Draft IS/MND language for all APMs and MMs above and additional APMs and MMs not listed above, please refer to Chapter 6.0 *MMRP* of the Draft IS/MND.

Resource Areas

Biological Resources

During the construction phase, the project may result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. While surveys did not identify any special status plants in the proposed project area, red bluff dwarf rush, silky cryptantha, slender Orcutt grass, and Nuttall's ribbon-leaved pondweed all have a potential to occur within wetlands along the proposed project route. Furthermore, protected wildlife such as the foothill yellow-legged frog and the western spadefoot, as well as any nesting birds, could be disturbed by project activities. These impacts would be significant.

However, APM BIO-1 would require the applicant to bore beneath waterways and wetlands in the project area that could support sensitive biological resources, such as special-status species and their habitats. APM BIO-2 and APM BIO-3 establish minimum buffer distance between bore pits and sensitive wetland/aquatic resources (including wetland vegetation) to further help protect these resources. APM BIO-4 requires that the applicant develop a SWPPP to ensure that construction activities do not cause erosion or runoff into sensitive biological resources, such as wetland features. MM BIO-5 requires that the applicant avoid orchards during construction, as orchards can contain suitable habitat for certain species. APM BIO-6 prohibits tree removal and requires that the applicant minimize tree and vegetation trimming; this protects not only the tree and vegetation, but also ensures that wildlife species relying on the vegetation as habitat or for another purpose, such as a nesting site, are not disturbed. Finally MM BIO-1 requires that construction activities that would occur during Nesting Bird Season (February 1-August 31) implement appropriate strategies that eliminate the potential for bird nest disturbance. Through implementation of the measures described above, the potential for substantial adverse effects to special status species would be reduced to Less than Significant levels.

Cultural Resources/ Tribal Cultural Resources

During the construction phase, the project could result in cultural or tribal cultural resource impacts. The new high-speed internet broadband fiber optic transmission cable component of the proposed project would be installed underground within 50 feet of the eastern side of the Cloverdale Cemetery. The proposed project alignment would avoid any direct impact within the cemetery. Therefore, the proposed project is unlikely to uncover human remains associated within the cemetery. Nonetheless, unknown human remains could be encountered during construction of the proposed project. Disturbance to human remains, including those interred outside of formal cemeteries could result in a significant impact.

However, in the event that unknown human remains are encountered during construction of the proposed project, APM CR-4 would require construction activities to halt and the County Coroner to be contacted. MM CUL-1 requires workers to be given an overview of the potential for encountering human remains during construction of the proposed project, including any that may be located in the vicinity of the Cloverdale Cemetery. MM CUL-2 requires monitoring for cultural resources by a CPUC-approved archaeologist with experience in identifying human remains in the vicinity of the Cloverdale Cemetery. MM CUL-5 also supplements APM CR-4 by providing further details outlining the procedures that TDS would follow for treatment of any human remains discovered or recognized during construction of the proposed project. Through

implementation of the measures described above, the potential for disturbance of human remains would be reduced to Less than Significant Levels.

Several known historical resources were identified within the general vicinity of the proposed project area; however, one historical resource (Igo Inn) was assumed to be eligible for the California Register of Historic Resources in this environmental document, but is not within the area of direct impact. In addition, consultation with California Native American tribes in accordance with Assembly Bill 52 resulted in the identification of the Cloverdale Cemetery as an area of concern for the Wintu Tribe of Northern California & Toyon-Wintu Center. Furthermore, the Wintu Tribe of Northern California & Toyon-Wintu Center noted that waterways were an important resource that needed consideration with regard to the potential impacts of the proposed project. A substantial adverse change in the significance of a tribal cultural resource could result in a significant impact.

However the applicant has proposed APMs that would help to reduce the potential for impacts to the Cloverdale Cemetery. These include APM CR-2 (which has been implemented and incorporated into the project design) and APM CR-4. In addition, MM CUL 1, MM CUL-2, MM CUL-3, MM CUL-5 will be implemented. Further MM TCR-1 requires a Native American monitor from the Wintu Tribe to observe ground-disturbing activities and all work within 200 feet of the Cloverdale Cemetery, subject to conditions outlined in this mitigation measure. MM TCR-2 outlines procedures that TDS will implement in the event a resource is discovered that, in the opinion of the CPUC-approved archaeologist, may be considered a tribal cultural resource or a resource of importance to the Wintu Tribe. In addition, the applicant has identified the following APMs that collectively would help to avoid physical impacts on waterbody and wetland crossings, including areas adjacent to these features: APM BIO-1, APM BIO-2, APM BIO-3, APM CR-1, APM CR-3, APM CR-4, APM GEO-4, and APM GEO-7. In particular, APM CR-3 and APM CR-4 would assist in the avoidance of potential archaeologically sensitive areas adjacent to waterbodies and wetland crossings. Through implementation of the measures described above, the potential for substantial adverse change in the significance of a tribal cultural resource would be reduced to Less than Significant Levels.

Geology and Soils

During the construction phase, the project may result in substantial erosion or the loss of topsoil. While soils in the proposed project area have a low susceptibility to erosion by water, they have a moderate susceptibility to wind erosion. When bare soils are exposed during construction activities, soils in the excavated areas may experience erosion. Eroded soils and sediments could run offsite, entering sensitive aquatic resources and features. This impact would be significant.

However, implementation of APM GEO-1 requires that the applicant incorporate proper sediment and excavated spoils management practices, and APM GEO-2 requires the applicant to develop a SWPPP, which would contain additional BMPs that would help further minimize erosion and contain sediment onsite. APM GEO-3 requires that construction-related materials be properly contained on site to prevent eroded sediments from discharging offsite. APM GEO-4 prohibits staging of construction materials, including excavation spoils, in drainage areas. Finally, APM GEO-5 and APM GEO-6 require that disturbed soils be store, contained, and covered in a controlled area to prevent offsite runoff. Through implementation of the measures described above, the potential for substantial erosion would be reduced to Less than Significant levels.

Hazards and Hazardous Materials

The proposed project could result in numerous impacts relating to hazards and hazardous materials during the project construction phase. Project construction activities would involve the use of common hazardous materials, such as gasoline, diesel fuel, antifreeze, and other materials. If any of these materials were to leak or spill, including due to accidental circumstances, they could present a hazard to the public. Because there are two schools within 0.25 miles of the proposed project alignment, these schools could be at risk of exposure to these hazards. Finally, because the project is located within a "Very High" Fire Hazard Severity Zone, the use of flammable materials such as gas and oil, which could be accidentally spilled during project construction and unintentionally ignited by a spark, does slightly elevate the risk of exposing people or structures to wildland fire hazards. These impacts would be significant.

However, implementation of APM HAZ-1 and APM HAZ-3 require proper labelling, storage, staging, and handling of hazardous materials to ensure that they are safely contained onsite. APM HAZ-2 and APM HAZ-6 require worker safety training in both hazardous materials use and handling, as well as in the risks associated in wildland fires and strategies to prevent wildland fires. APM HAZ-4 requires that hazardous waste materials removed during construction be properly handled and disposed of licensed professionals. Finally, APM HAZ-5 requires that crews keep clean-up kits on-site during construction, and requires that hazardous spills be reported to the appropriate agencies. Combined, these measures significantly reduce the potential for hazardous materials such a fuels, oil, and gasoline from spilling offsite and presenting a public hazard. Additionally, the measures help establish a construction site that minimizes the risk of wildland fire events. Through implementation of the measures described above, the potential for hazards such as public exposure to hazardous materials, accidental spills, and wildland fires would be reduced to Less than Significant levels.

Hydrology and Water Quality

During the construction phase, project activities could potentially lead to water quality standard or waste discharge requirement violations. Such violations could occur if project-related materials (eroded sediments, excavation spoils, equipment fuels, etc.) enter waterways or other aquatic features crossed by the project. This impact would be significant.

However, implementation of APM GEO-1 requires that the applicant incorporate proper sediment and excavated spoils management practices, and APM GEO-2 requires the applicant to develop a SWPPP, which would contain additional BMPs that would help further minimize erosion and contain sediment onsite. Additionally, APM BIO-2 and APM BIO-3 establish minimum buffer distance between bore pits and sensitive wetland/aquatic resources, to help protect these resources from project-related runoff. Finally, APM HAZ-5 requires that the applicant keep spill clean-up kits on-site during construction, that all equipment be in good working order, and that hazardous spills be promptly reported to the appropriate agencies. Through implementation of the measures described above, the potential for water quality standard or waste discharge requirement violations would be reduced to Less than Significant levels.

Noise and Vibration

During the construction phase, project activities (such as temporary directional boring operations) may result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, when compared to pre-project levels. This impact would be significant.

However, through implementation of APM NOI-1, construction activities are limited to between the hours of 7 a.m. through 7 p.m., Monday through Friday. Additionally, MM NOI-1, the applicant must notify residences and landowners proximal to the proposed project alignment at least five days before construction activities commence on that street. Through implementation of the measures described above, the potential for long-term excessive noise emissions beyond permitted levels and existing conditions would be reduced to a Less than Significant level.

Transportation and Traffic

During the construction phase, project activities could potentially result in transit-related hazards, such as construction equipment and activities in public roadways, which could subsequently interfere with emergency access routes. Additionally, project construction would temporarily interfere with bicycle access in bike lanes or along road shoulders where the proposed project would be installed in the existing roadway right-of-way. These impacts would be significant.

However, through implementation of APM TRA-1, APM TRA-2, APM TRA-3, APM TRA-5, and APM TRA-7, the applicant would be required to obtain all necessary road encroachment permits prior to beginning construction. In addition to full permit condition compliance, the applicant would be required to limit lane closures during peak travel hours, develop a traffic control plan and circulation and/or detour plan as needed, and ensure that all traffic control devices utilized as part of plan conditions comply with the requirements specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance. Furthermore, to ensure that project-related construction activities do not result in permanent roadway damage, APM TRA-1 would require the applicant to photographically document roadway conditions prior to and after construction, and repair any roadways that were damaged by project activities. Finally, MM TRA-2 requires that the applicant provide advanced notification to emergency service providers or the location, date, time, and duration of lane closures at least one week prior to the closure. Through implementation of the measures described above, the potential for transportation- and traffic-related impacts such as transit-related hazards or interference, and the potential for emergency access route interference, would be reduced to Less than Significant levels.

Wildfire

During the construction phase, project activities could potentially exacerbate wildfire risks, such as the use of flammable or combustible liquids (i.e., gasoline, diesel, fuel, motor oil, antifreeze, transmission fluids, and hydraulic fluids) to operate construction equipment. Flammable or combustible liquids spilled during construction could contribute to an increased risk of fire if ignited by an open flame or spark. Accidental releases or spills of the aforementioned flammable or combustible liquids could occur. In the event of a wildfire emergency, either within or outside of the proposed project area, project-related equipment staged or operating within public ROW could impede emergency wildfire responder access. These impacts would be significant.

However, through implementation of APM HAZ-1, APM HAZ-2 and APM HAZ-5, the applicant would ensure that flammable materials are labeled, stored, and used appropriately; ensuring that contractors are properly trained in handling flammable materials, and requiring that spill clean-up kits be provided and kept on site during construction to clean up any spilled flammable liquids. Furthermore, APM HAZ-6 would be implemented to reduce the potential for wildland fires caused by the proposed project by requiring workers to be instructed regarding the danger of

wildland fire and carefully parking equipment in areas without dry, brushy vegetation. In addition, all work vehicle shall be equipped with a fire extinguisher and cigarettes and trash shall be disposed of in proper containers and taken off site at the end of the day. Implementation of MM TRA-2 would require the applicant to perform construction activities in a manner that maintains emergency access on roadways at all times. Through implementation of the measures described above, the potential for wildfire impacts such as exacerbating wildfire risks would be reduced to Less than Significant levels.