

# Appendix A

## **NOP/Comments**



# Notice of Preparation for an Environmental Impact Report

## Santa Barbara County Last-Mile Broadband Program

Notice is hereby given that the Santa Barbara County Association of Governments (SBCAG) will be the lead agency for the preparation of an Environmental Impact Report (EIR) for Santa Barbara County Last-Mile Broadband Program (“Broadband Program” or “Project”). Pursuant to section 15082 of the California Environmental Quality Act (CEQA), SBCAG is soliciting comments from all interested persons, responsible and trustee agencies and organizations concerned with the project as to the scope and content of the of the EIR and the environmental information to be analyzed in connection with the Project. The project description, location, environmental review requirements, and probable environmental issues to be addressed in the EIR are attached. An Initial Study has been prepared for the Project in accordance with State CEQA Guidelines Section 15063(a) and is included as an attachment to this Notice of Preparation (NOP), which is available at the following link: <https://www.sbcag.org/wp-content/uploads/2024/05/Broadband-Program-EIR-Initial-Study.pdf>.

**SBCAG will host a virtual EIR Scoping Meeting/Public Workshop.** The purpose of the meeting is to solicit input on the scope and content of the environmental analysis that will be included in the EIR, as well as to inform the public about the Project itself. The date, time and virtual location of the meeting is:

- Thursday, June 6, 2024 from noon to 1:00 p.m. (public can log in starting at 11:45 a.m.)
- Register to attend for Zoom meeting information: <https://bit.ly/BroadbandEIR>
- For accommodations and Spanish-language interpretation, contact SBCAG 48 hours in advance at (805) 961-8900 or [info@sbacg.org](mailto:info@sbacg.org).

Mail comments to Fred Luna at SBCAG, 260 North San Antonio Road, Suite B, Santa Barbara, CA 93110, or e-mail comments to [info@sbacg.org](mailto:info@sbacg.org) no later than thirty days after receipt of this notice or by **5:00 p.m. on July 1, 2024**. For more information, please call 805-961-8900.

## PROJECT DESCRIPTION AND SCOPE OF ENVIRONMENTAL ANALYSIS

### Project Title

Santa Barbara County Last-Mile Broadband Program (“Project”)

### Project Location

The area subject to future broadband facility installations under the proposed Project includes the entire County of Santa Barbara, since, with a few exceptions discussed below, the specific locations of future broadband facility installations are currently not known (see **Figure 1, Regional Location**, below). Such future installations would be proposed and implemented as part of the Broadband Program, where appropriate, in order to provide adequate high-speed broadband internet services to underserved and unserved communities as priority communities and funding sources are identified. A total of nine communities in the County have already been identified as “Priority Areas” under the Broadband Program. **Figure 2, Broadband Facility Locations**, below, provides a County-wide view of the Project Area, including the location of existing and/or approved middle-mile broadband facilities in the County, as well as the locations of all nine identified Priority Areas.

### Project Description

The Project will include the installation of fiber optic cable in various locations throughout the County. High-level network designs for last-mile connections have been prepared for four Priority Areas. Funding for implementation, low-level design and construction, has been applied for but as of this NOP release, not yet been awarded. If awarded, SBCAG would have the Golden State Connect Authority (GSCA) undertake the work as they prepared the application and are a full-service

broadband infrastructure provider, that would design, permit, construct, operate, and maintain all proposed broadband network facilities in perpetuity within the four Priority Areas. An additional five Priority Area locations are looking to be advanced for high-level network design through SBCAG's agreement with GSCA.

In general, the new fiber optic lines would be installed underground following public or private roadways with the intention to minimize or avoid disturbance of roadway surfaces wherever feasible. However, it is possible some fiber optic lines could be installed directly under roadways in areas with limited shoulder space or where existing conduit under the road may be used, thus avoiding new surface disturbance. The Project also includes installation and construction activities within those areas where lateral lines are installed between public or private roadways and individual businesses or residences. Individual residence or business connections typically would be installed within previously disturbed and/or developed areas (e.g., adjacent to driveways or in landscaped areas), and generally would avoid drainages and sensitive habitats. Lateral alignments would typically follow other utility installations. Although not anticipated, where subsurface installation of fiber optic cable is infeasible, aerial installation along existing utility poles will be undertaken. GSCA's methods of aerial installation will follow General Order 95 pole safety and loading requirements.

Components to be installed/constructed within the four Priority Areas include the following: broadband conduit (i.e., rigid casing to protect fiber optic cables from physical damage and the elements) with diameters between 3/4-inch and 2 inches to be installed within road rights-of-way (ROWs); aboveground, prefabricated walk-in hut/shelters made of aggregate wall materials; small aboveground steel distribution cabinets/enclosures; distribution fiber, splice points, and drops; drop hubs; and small underground structures such as hand holes. Additional Project components that may be necessary to connect end-users to the middle-mile broadband network may include: utility poles with aerial fiber and connection points; underground fiber markers; and signage.

Once constructed, the broadband network components would generally operate passively, with only incidental maintenance typically consisting of weed abatement and periodic accessing of hand holes and splice cases from the ground surface along a given alignment.

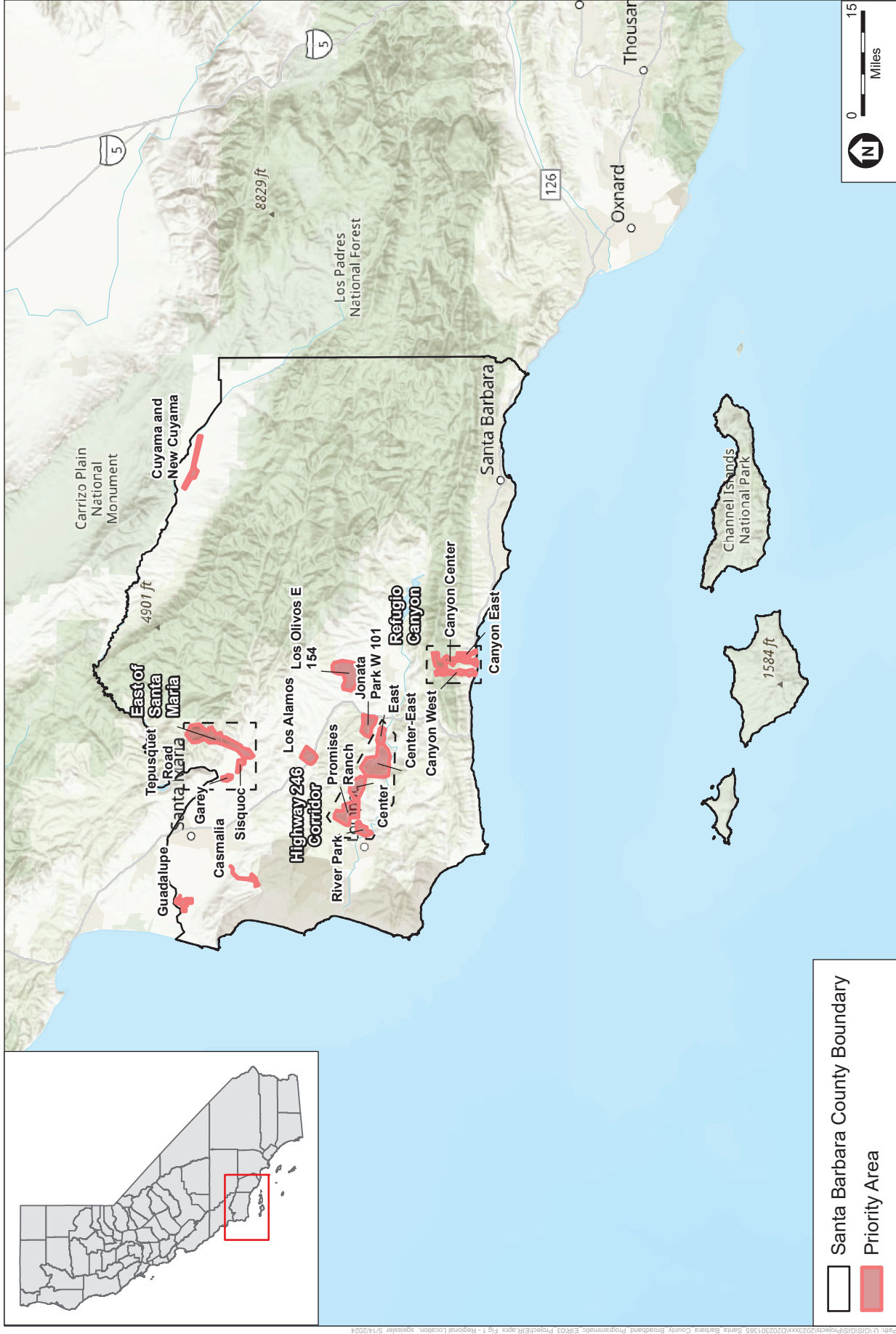
### **Issues to Be Addressed in the EIR**

The impact categories listed below have been preliminarily identified as anticipated issues to be addressed in the Program EIR.

- Air Quality
- Biological Resources
- Cultural Resources (including Paleontological Resources)
- Energy
- Greenhouse Gas Emissions/Climate Change
- Noise
- Tribal Cultural Resources
- Utilities and Service Systems (Electrical and Telecommunications Facilities)

As a Program EIR, the EIR will have three primary purposes: (1) to provide a broad overview of the potential environmental consequences of the implementation of the Project on a County-wide basis; (2) to serve as a mid-tier environmental document that will focus and streamline the subsequent project-level review of individual future projects that will be undertaken and in aggregate are referred to as the Project; and (3) to provide detailed project-level analysis of the nine Priority Area project locations that will be evaluated in the PEIR.

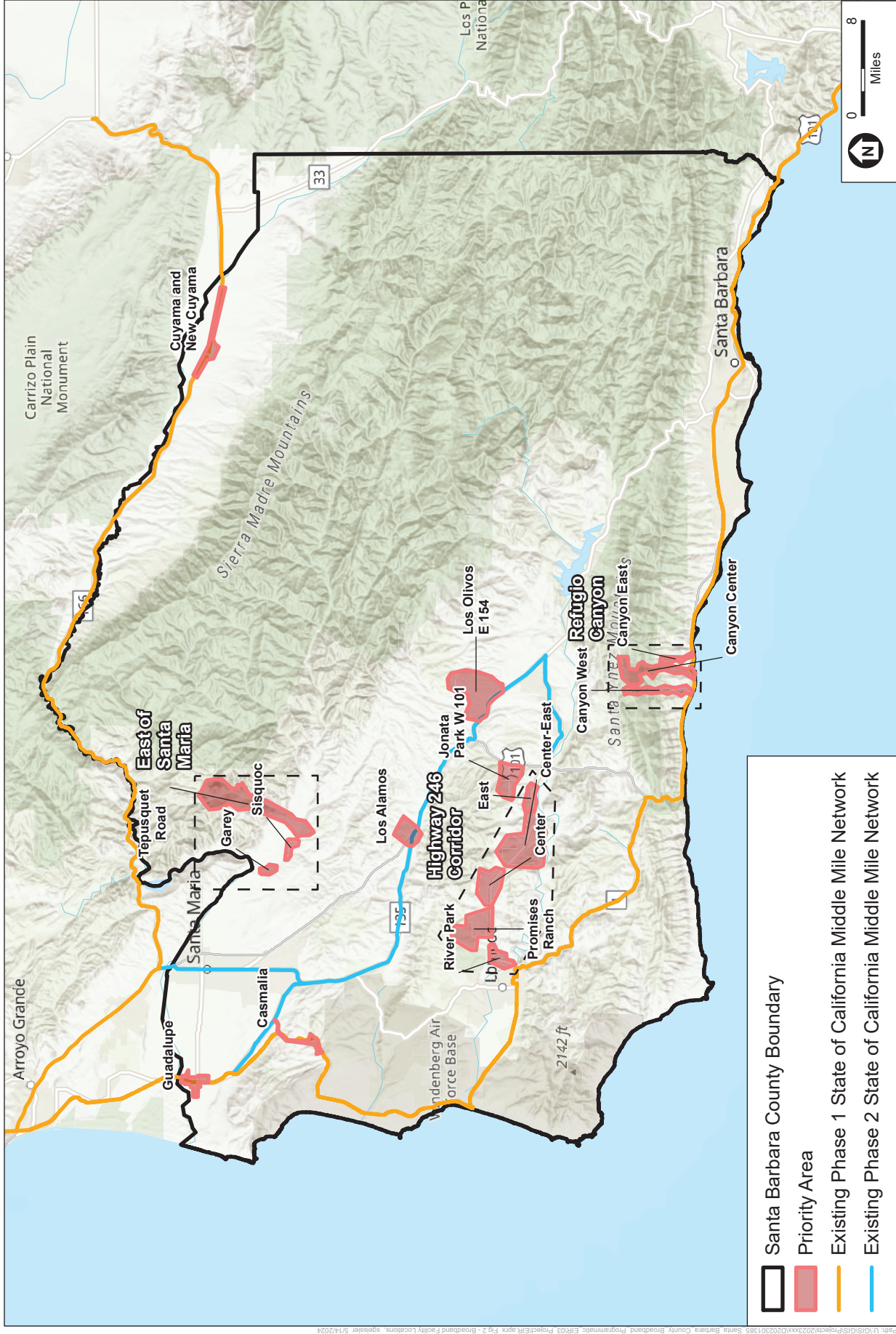




SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

**Figure 1**  
Regional Location



SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

**Figure 2**  
Broadband Facility Locations

# SANTA BARBARA COUNTY LAST-MILE BROADBAND PROGRAM

Initial Study/Notice of Preparation

Prepared for  
Santa Barbara County Association of Governments

May 2024





# SANTA BARBARA COUNTY LAST-MILE BROADBAND PROGRAM

Initial Study/Notice of Preparation

Prepared for  
Santa Barbara County Association of Governments

May 2024

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# INITIAL STUDY

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## Environmental Checklist

### Project Details

1. **Project Title:** Santa Barbara County Last-Mile Broadband Program
2. **Lead Agency Name and Address:** Santa Barbara County Association of Governments,  
260 North San Antonio Road, Suite B, Santa Barbara,  
CA 93101
3. **Contact Person and Phone Number:** Fred Luna, (805) 961-8926
4. **Project Location:** Throughout County of Santa Barbara
5. **Project Sponsor's Name and Address:** Santa Barbara County Association of Governments,  
260 North San Antonio Road, Suite B, Santa Barbara,  
CA 93101
6. **General Plan Designation(s):** Several
7. **Zoning:** Several
8. **Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)**

See Project Description section below.

#### 9. **Surrounding Land Uses and Setting. (Briefly describe the project's surroundings.)**

The area subject to future broadband facility installations under the proposed Project includes the entire County of Santa Barbara, both incorporated cities and unincorporated areas, since, with a few exceptions discussed below, the specific locations of future broadband facility installations are currently not known. The currently identified locations for near-term last-mile broadband installations includes the City of Guadalupe and portions of several unincorporated communities within the County including Cuyama/New Cuyama, Casmalia, Los Alamos, Los Olivos, Jonata Park, Refugio Canyon, Highway 246 Corridor (five neighborhoods between Lompoc and Buellton), and East of Santa Maria (including the Garey, Sisquoc, and Tepusquet Road communities). See Project Description below for more detailed information. While land uses throughout the Project Area vary depending by community and specific location therein, typical land uses within and around the identified nine Priority Areas mainly include residential, commercial, agricultural, open space, and industrial uses.

#### 10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)**

The following agencies have potential authority over permits and/or other approvals necessary to implement the Project: County of Santa Barbara, City of Guadalupe, City of Santa Maria, City of Lompoc, City of Buellton, City of Solvang, City of Goleta, City of Santa Barbara, City of Carpinteria, California Department of Transportation, California Department of Fish and Wildlife, California Coastal Commission, Central Coast Regional Water Quality Control Board, Santa Barbara County Air Pollution Control District, United States Army Corps of Engineers, United States Fish and Wildlife Service, United States Forest Service, or other affected agencies.

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

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.*

SBCAG will solicit government-to-government consultation with affected tribal organizations in the County in accordance with Assembly Bill (AB) 52 to determine the potential for tribal cultural resources to be affected by Project activities. A summary of SBCAG's AB 52 tribal consultation efforts will be provided in the Tribal Cultural Resources section of the Program Environmental Impact Report (PEIR). See further discussion in Section XVIII, *Tribal Cultural Resources*, of this Initial Study, below.

# Project Description

## Introduction

The Santa Barbara County Association of Governments (“SBCAG”), in partnership with the County of Santa Barbara (“County”) is proposing to facilitate the future expansion of the County’s high-speed broadband internet network, referred to herein as the Santa Barbara County Last-Mile Broadband Program (“Broadband Program” or “Project”). The Project would facilitate implementation of future broadband infrastructure installations in various communities across Santa Barbara County that are currently underserved or unserved by high-speed broadband internet services. These broadband facility installations could include both underground and aerial fiberoptic cable as part of proposed “last-mile” broadband facilities, which are intended to reach end users in these affected communities. These last-mile facilities would provide connections to end users in communities across the County, and connect from the State of California’s “middle-mile” broadband network (“Statewide Middle Mile Network”) currently being implemented by the California Department of Technology.

## Project Location

The area subject to future broadband facility installations under the proposed Broadband Program (i.e., the “Project Area”) includes the entire County of Santa Barbara, since, with a few exceptions discussed below, the specific locations of future broadband facility installations are currently not known (see **Figure 1, Regional Location**). This includes both incorporated cities and unincorporated areas. Such future installations would be proposed and implemented as part of the Broadband Program, where appropriate, in order to provide adequate high-speed broadband internet services to underserved and unserved communities as priority communities and funding sources are identified. As discussed in greater detail below, a total of nine communities in the County have already been identified as “Priority Areas” under the Broadband Program. Four of these communities were initially identified in the Santa Barbara County Broadband Strategic Plan (BSP, see further discussion below) and thus have already been the subject of high-level engineering design, while the design of the proposed networks to serve the remaining five communities is currently in progress. **Figure 2, Broadband Facility Locations**, provides a County-wide view of the Project Area, including the location of existing and/or approved middle-mile broadband facilities in the County, as well as the locations of all nine identified Priority Areas.

## Background

The State of California has undertaken a significant initiative to build a critical fast-speed internet network and create an equitable, high-speed, open access system. Senate Bill (SB) 156, signed by Governor Gavin Newsom in July 2021, established government pathways and funding mechanisms to acquire, build, maintain, and operate accessible broadband networks. “Middle-mile” broadband network provides that connection from large core internet pipelines (termed the “first-mile” broadband network) to homes and communities (termed the “last-mile” broadband infrastructure). The last mile work looks to provide connections to unserved and underserved communities. Last-mile infrastructure relies on the middle-mile facilities to provide service to broadband customers including residents, large and small businesses, schools, government offices, public safety agencies, and libraries, among others. Therefore, one result of SB 156 was the establishment of the Local Agency Technical Assistance (LATA) grants,

which are available to local jurisdictions to build these last-mile network connections to serve end users within unserved and underserved communities.

The COVID-19 pandemic highlighted stark inequities in internet access across Santa Barbara County. Some rural schools returned to physical workbooks and printed pages for at-home instruction during school shutdowns, due to a lack of reliable, affordable internet access in their communities.

Approximately 25 percent of households with incomes less than \$20,000 per year do not have internet access, and on the whole, approximately nine percent of all households in the County do not have access. Therefore, SBCAG and the County of Santa Barbara, both being partners in the Broadband Alliance of Santa Barbara County (Alliance), collaborated with local agencies, tribal organizations, the Broadband Consortium of the Pacific Coast, and regional economic development organizations to develop the Santa Barbara County Broadband Strategic Plan (BSP) in 2022. Following the strategic planning effort, SBCAG partnered with the County on a LATA grant to facilitate extension of broadband service within the County, and in 2023 the California Public Utilities Commission (CPUC) awarded a LATA grant to the County of Santa Barbara for broadband planning and implementation. The grant funds the creation of a countywide Joint Powers Authority (JPA) to formalize the Alliance, preparation of the necessary California Environmental Quality Act (CEQA) documentation, and completion of high-level design engineering to facilitate and streamline implementation of local broadband projects. In these ways, the LATA grant funds are assisting the County in securing funding to build a last-mile “fiber-to-the-home” network to connect underserved and unserved locations within the County.

High-level network designs for last mile connections have been prepared for four Priority Areas. Funding for implementation, low-level design, and construction of the fiber optic facilities in these areas has been applied for but has not yet been awarded. If awarded, SBCAG would have the Golden State Connect Authority (GSCA) undertake the work, as they prepared the application and are a full-service broadband infrastructure provider, that would design, permit, construct, operate, and maintain all proposed broadband network facilities in perpetuity within the four Priority Areas. An additional five Priority Area locations are looking to be advanced for high-level network design through SBCAG’s agreement with GSCA. As shown in Figure 2, these nine Priority Areas include: the City of Guadalupe and unincorporated communities including portions of Cuyama/New Cuyama, Casmalia, Los Alamos, Los Olivos, Jonata Park, Refugio Canyon, Highway 246 Corridor (five neighborhoods between Lompoc and Buellton), and East of Santa Maria (including the Garey, Sisquoc, and Tepusquet Road communities). In addition, these unincorporated communities are some of the County’s identified Environmental Justice Communities currently being considered in the Environmental Justice Element of the County’s Comprehensive Plan.

## Broadband Strategic Plan

The BSP, as mentioned above, was prepared by the Alliance, which was completed in 2022 and is comprised of SBCAG, the County of Santa Barbara, the cities of Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria, Solvang, and the Santa Ynez Band of Chumash Indians, Broadband Consortium of the Pacific Coast (BCPC), and regional economic development organizations.

The BSP was intended to identify broadband internet infrastructure and affordability needs in the County. The Alliance intends to continue to leverage the BSP to seek funding opportunities for projects to

improve County-wide affordable access to high-speed broadband in homes, schools, businesses, healthcare, and to connect community anchor institutions

The BSP was created to respond to the regional need for high-speed internet access, which was intensified during the COVID-19 pandemic when schools, businesses, public services, and health care support moved online, and many individuals began working from home. Gaps in access to reliable, affordable high-speed internet disenfranchise households by limiting their access to education, the workforce, health care, and democratic processes. The digital divide defines the gap between those with the capacity to use technology and those left out of opportunities provided by digital access. While residents throughout the County have access to moderate levels of connectivity, all households, businesses, and public institutions would benefit from the faster and more reliable internet access that broadband connections deliver.

The purpose of the BSP is to address the planning needs of the region, encourage infrastructure investments in the County, and present models for investment opportunities made by internet service providers (ISPs), public sector investment, and a combination of public-private investment. The BSP utilized a regional context, aligning with the California State Broadband Action Plan (CBAP) and focused on identifying a middle-mile approach, last-mile priorities, policies and resources for broadband readiness, and future feasibility studies for the County and incorporated cities.

The BSP found, through a comprehensive needs assessment, that approximately 7.9 percent of the County's population does not have access to adequate (25 megabits per second [Mbps] download speed and 3 Mbps upload speed, indicated as "25/3 Mbps") internet services, which corresponds with the population within unserved and priority unserved areas. The analysis initially identified priority unserved areas in remote communities including the Priority Areas of Casmalia, Los Alamos, and Cuyama/New Cuyama, as noted above, but also found various other areas that would become important for last-mile infrastructure development including the remaining five unincorporated Priority Areas noted above (also see Figure 2).

After analysis of the existing infrastructure and needs, the BSP identified a path for moving forward including developing local strategies, attracting collaborative funding, and conducting community actions that support ongoing connectivity and adoption. Another step is conducting a last-mile pilot in order to develop processes for applying technical support at the neighborhood level to achieve access and adoption.

The BSP outlined the roles and responsibilities for the main activities associated with implementation of the BSP, including ensuring funding for the detailed network design, constructing the passive infrastructure, deployment of the active infrastructure, network operations and maintenance (O&M) activities, field maintenance activities, subscriber installation, subscriber management, and customer support. The priorities for middle-mile deployment include ensuring funding for the high-level design of the network in conjunction with stakeholders, coordinating with the work performed by the Santa Ynez Band of Chumash Indians and Econ Alliance for the North County middle-mile analysis and design, and continue coordinating with the State of California as relates to the Statewide Middle-Mile Broadband Network. The last-mile deployment priorities include areas that lack access to 25/3 MBps service based on the data collected; and these areas include portions of the eight unincorporated Priority Area communities of Cuyama/New Cuyama, Casmalia, Los Alamos, Los Olivos, Jonata Park, and Refugio

Canyon, Highway 246 Corridor, and East of Santa Maria (Garey, Sisquoc, and Tepusquet Road communities).

As the California Department of Technology (CDT) continues to build out the Statewide Middle Mile Network in Santa Barbara County, SBCAG and the County have initiated last-mile design efforts as part of the BSP implementation efforts. Those efforts include entering into an agreement with GSCA to prepare last-mile design for all priority areas identified to date, and perhaps other future areas as additional priorities are identified. GSCA has submitted applications to implement the first four areas, which are included as components of the Project. As required, the implementation will involve the use of fiber optics and an open-access model, which will allow GSCA to provide residences and businesses with future-proof broadband technology, and the choice of providers and packages that an open-access system provides, thus offering access to competitive speed offerings and pricing. Internet service offerings are anticipated to include minimum speeds of 100 Mbps symmetrical and maximum speeds, which are only limited by the electronics on either end of the fiber connection, but initially will be offered at up to 10 gigabits per second (Gbps)<sup>1</sup> symmetrical for households and up to 100 Gbps symmetrical for businesses. GSCA's service offerings will not have data caps (i.e., no limits on how much data may be transferred by any given network end user).

## Proposed Project Components

The Project will include the installation of fiber optic cable in various locations throughout the County, including within the four Priority Area communities. For the four near-term Priority Areas, GSCA has prepared high-level engineering designs that indicate the location of new broadband lines within each community. **Figure 3**, *Priority Area – Guadalupe*, **Figure 4**, *Priority Area – Casmalia*, **Figure 5**, *Priority Area – Los Alamos*, and **Figure 6**, *Priority Area – Cuyama and New Cuyama*, illustrate the proposed extent and locations for last-mile network installations within each of these communities. It should be noted that GSCA, as a full-service broadband infrastructure provider, would design, permit, construct, operate, and maintain all proposed broadband network facilities in perpetuity within the four Priority Areas.

In general, the new fiber optic lines would be installed underground following public or private roadways with the intention to minimize or avoid disturbance of roadway surfaces wherever feasible. However, it is possible some fiber optic lines could be installed directly under roadways in areas with limited shoulder space or where existing conduit under the road may be used, thus avoiding new surface disturbance.

The Project also includes installation and construction activities within those areas where lateral lines are installed between public or private roadways and individual businesses or residences. Individual residence or business connections typically would be installed within previously disturbed and/or developed areas (e.g., adjacent to driveways or in landscaped areas), and generally would avoid drainages and sensitive habitats. Lateral alignments would typically follow other utility installations.

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<sup>1</sup> One gigabit is equal to 1,000 megabits.



Although not anticipated, where subsurface installation of fiber optic cable is infeasible, aerial installation along existing utility poles will be undertaken. GSCA's methods of aerial installation will follow General Order 95 pole safety and loading requirements.

Components to be installed/constructed within the four Priority Areas include the following: broadband conduit (i.e., rigid casing to protect fiber optic cables from physical damage and the elements) with diameters between 3/4-inch and 2 inches to be installed within road rights-of-way (ROWs); aboveground, prefabricated walk-in hut/shelters made of aggregate wall materials and measuring 12 feet long by 10 feet wide with a height of up to 10 feet above grade (placed on a poured concrete pad); aboveground steel distribution cabinets/enclosures ranging in size between 28 by 39 inches and 47 by 128 inches; distribution fiber, splice points, and drops; drop hubs; and small underground structures such as hand holes measuring between less than 12 inches by 12 inches (less than one foot depth below grade) and 45 inches by 32 inches (27-inch depth below grade). Additional Project components that may be necessary to connect end-users to the middle-mile broadband network may include: utility poles with aerial fiber and connection points; underground fiber markers; and signage.

Once constructed, the broadband network components would generally operate passively, with only incidental maintenance typically consisting of weed abatement and periodic accessing of hand holes and splice cases from the ground surface along a given alignment.

## Construction Schedule and Assumptions

The proposed Broadband Program would involve the construction of new last-mile broadband facilities within communities in greatest need for adequate broadband services. While the specific size and location of all potential future broadband projects under the Broadband Program have not yet been identified, it is assumed that the nature and intensity of such future installation projects would be similar in scope and scale to those identified for the first four Priority Area projects. As such, for the purposes of analysis in this CEQA document, construction activities and methods employed for the initial four Priority Area projects would be comparable to those necessary for the installation of future broadband facilities in other portions of the County consistent with the BSP, including the additional Priority Area projects located in Los Olivos, Jonata Park, and Refugio Canyon, Highway 246 Corridor, and East of Santa Maria (Garey, Sisquoc, and Tepusquet Road communities).

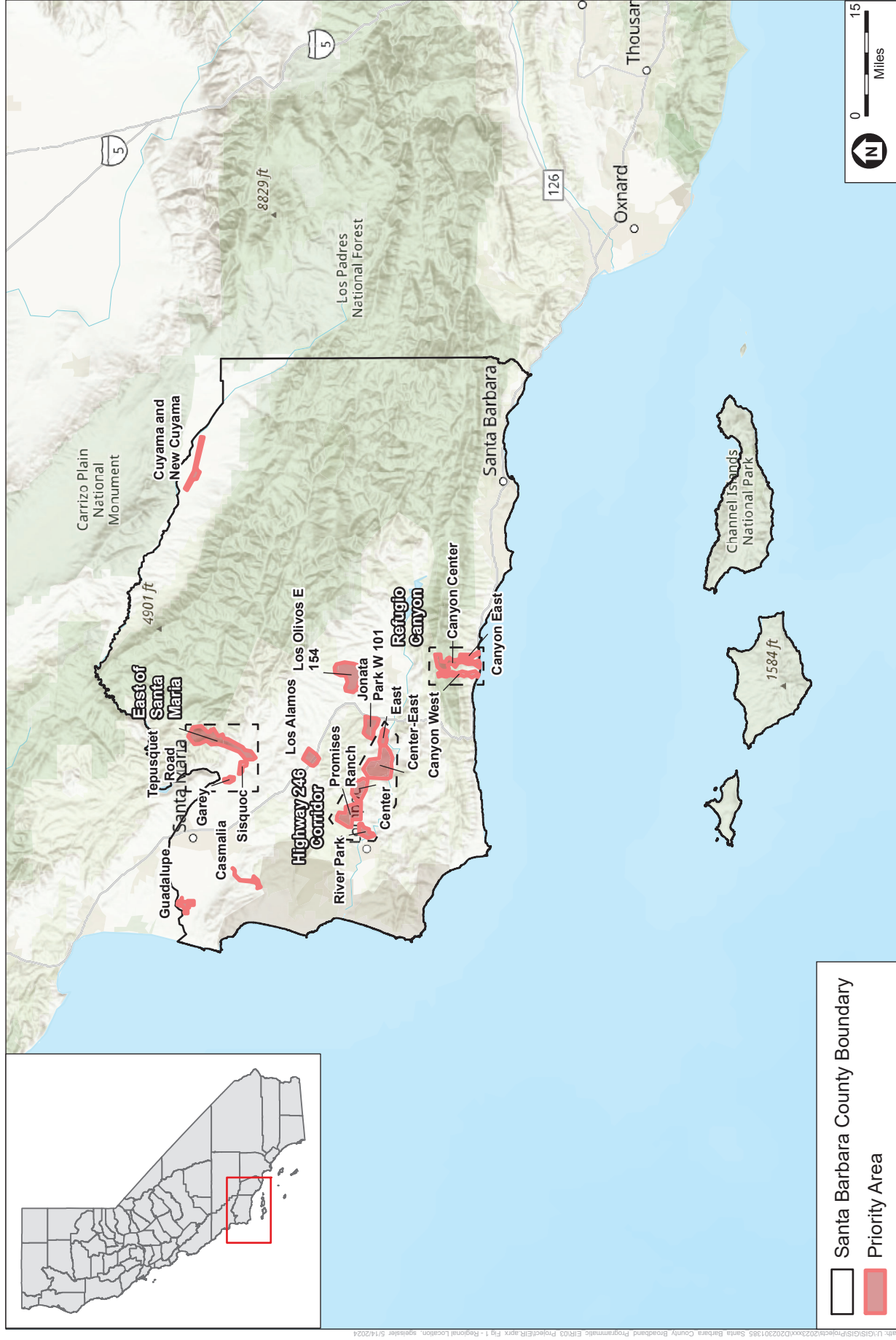
The initial four Priority Area installations would involve installing a total of approximately 52.57 miles of underground conduit/fiber. Construction methods would primarily include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but potentially up to two feet by six feet) and would be temporary in nature, with the ground surface and any paving or landscaping restored to pre-project conditions once construction is complete. Where appropriate, surface trenching (or micro-trenching) excavation widths would typically be limited to between 9 inches and 18 inches, which would result in a very limited construction footprint along the proposed cable alignments.

Construction worker parking, material stockpiling, and equipment staging and storage would occur within appropriate locations for each future broadband installation project, subject to review and approval by the respective local jurisdiction(s) and/or CEQA Lead Agency. It is anticipated that such temporary construction parking, stockpiling, and staging areas would be selected in consideration of a number of

factors including the size and configuration of the property, proximity to active or planned construction areas, sensitivity of resources on or near the site, safety or security concerns, and accessibility by construction workers and equipment, among others.

The four Priority Area projects would be constructed in four phases (i.e., each Priority Area project representing a single phase) over a period of approximately 24 months beginning in Spring 2025, which includes any necessary permitting and construction of the new facilities. Phases of construction may overlap, with work on one or more of the Priority Area projects potentially occurring concurrently. It is anticipated that future broadband projects of similar size and scale located in other areas of the County would require a comparable construction effort in terms of overall intensity, would employ a similar mix of construction methods and equipment, and would result in similar construction durations as those assumed for the four Priority Area projects.

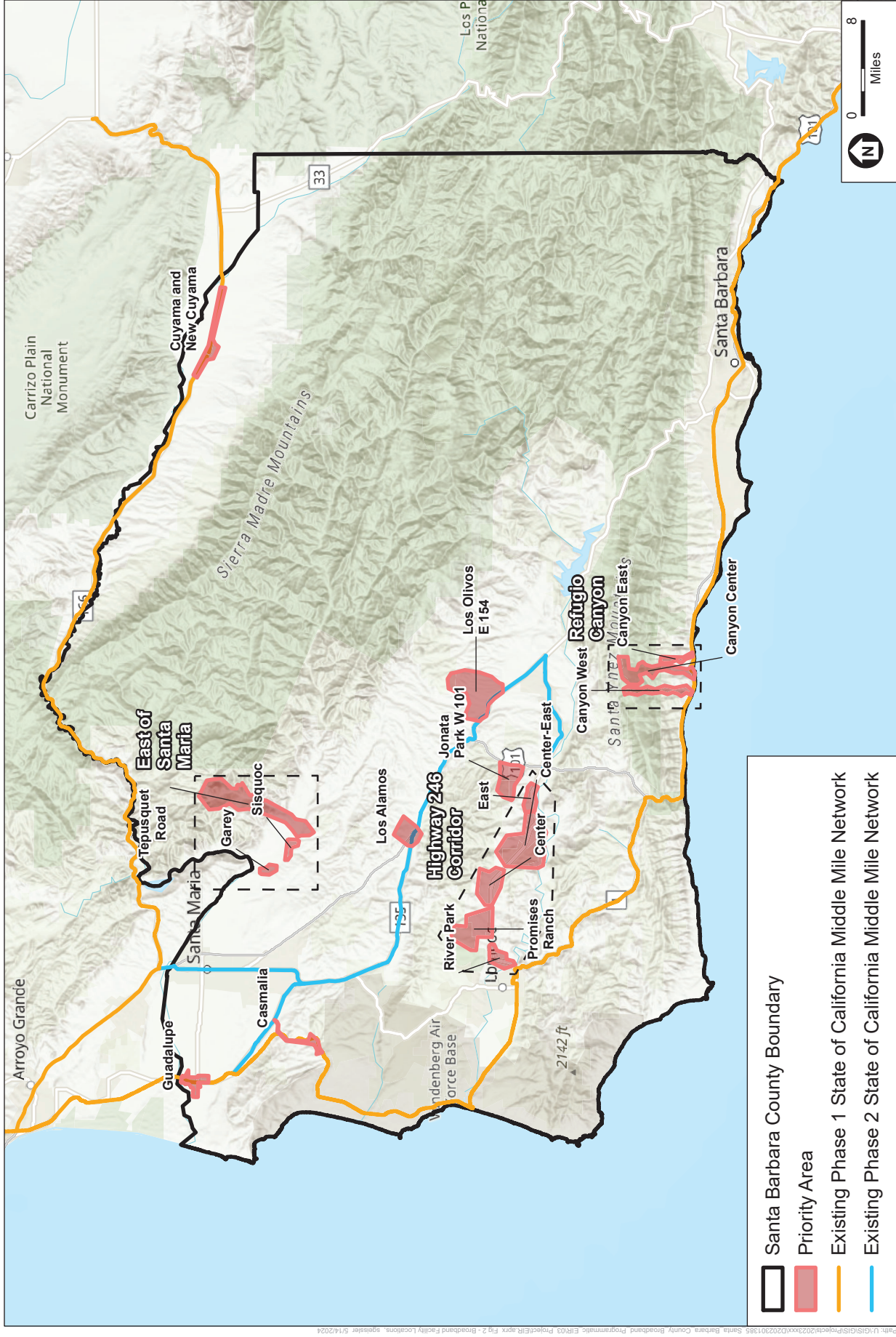




SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

## Figure 1 Regional Location

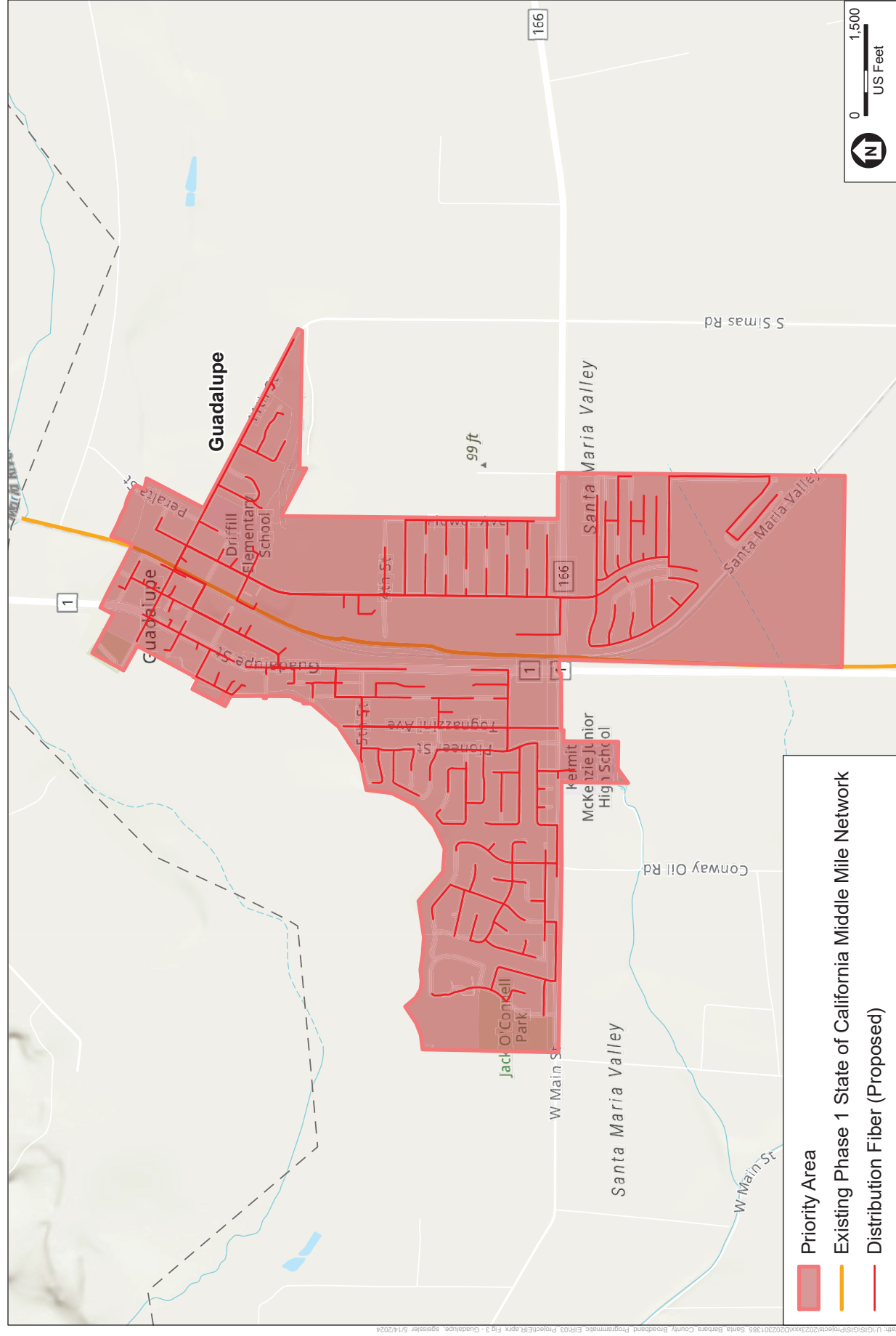


SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

**Figure 2**  
Broadband Facility Locations

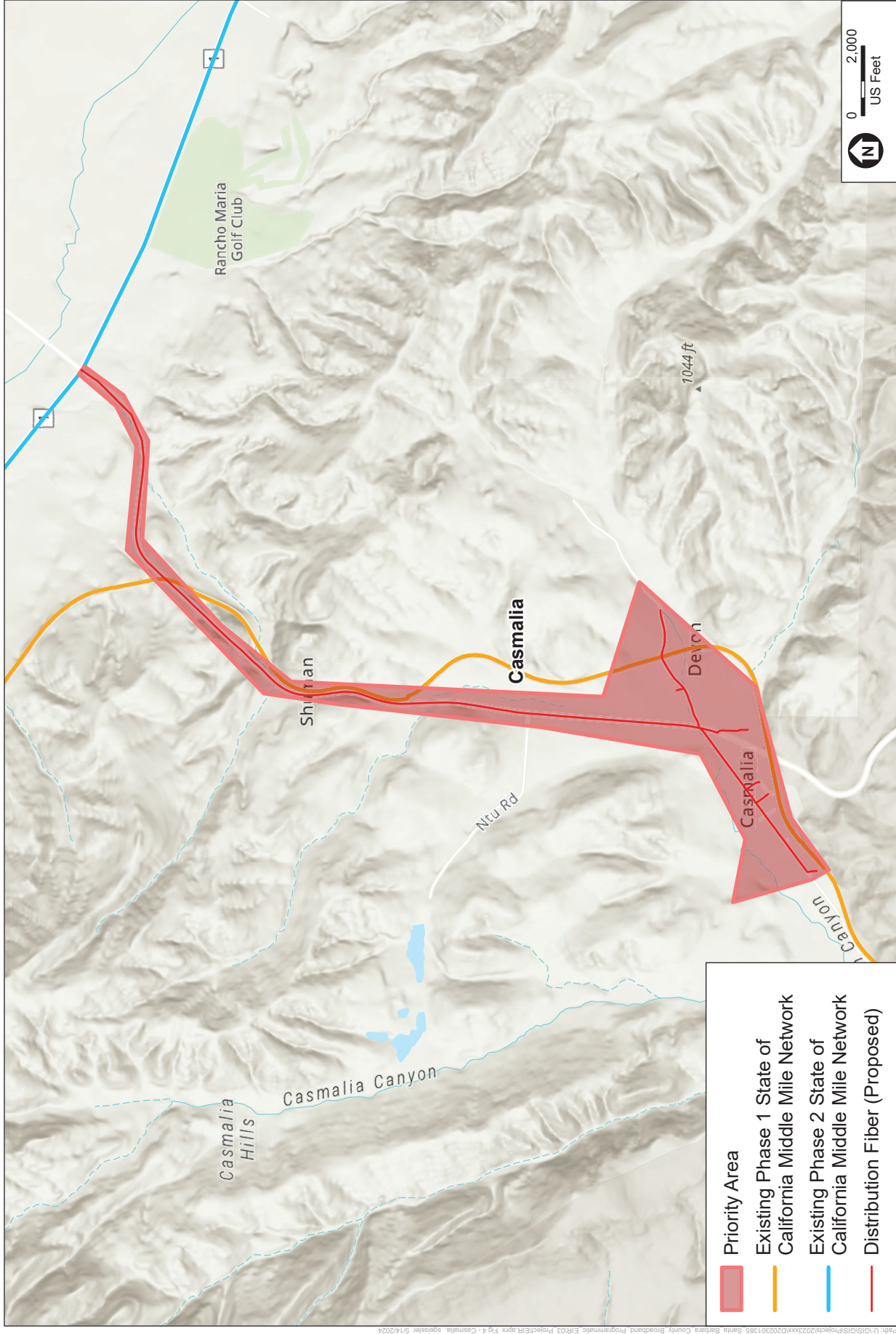




SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

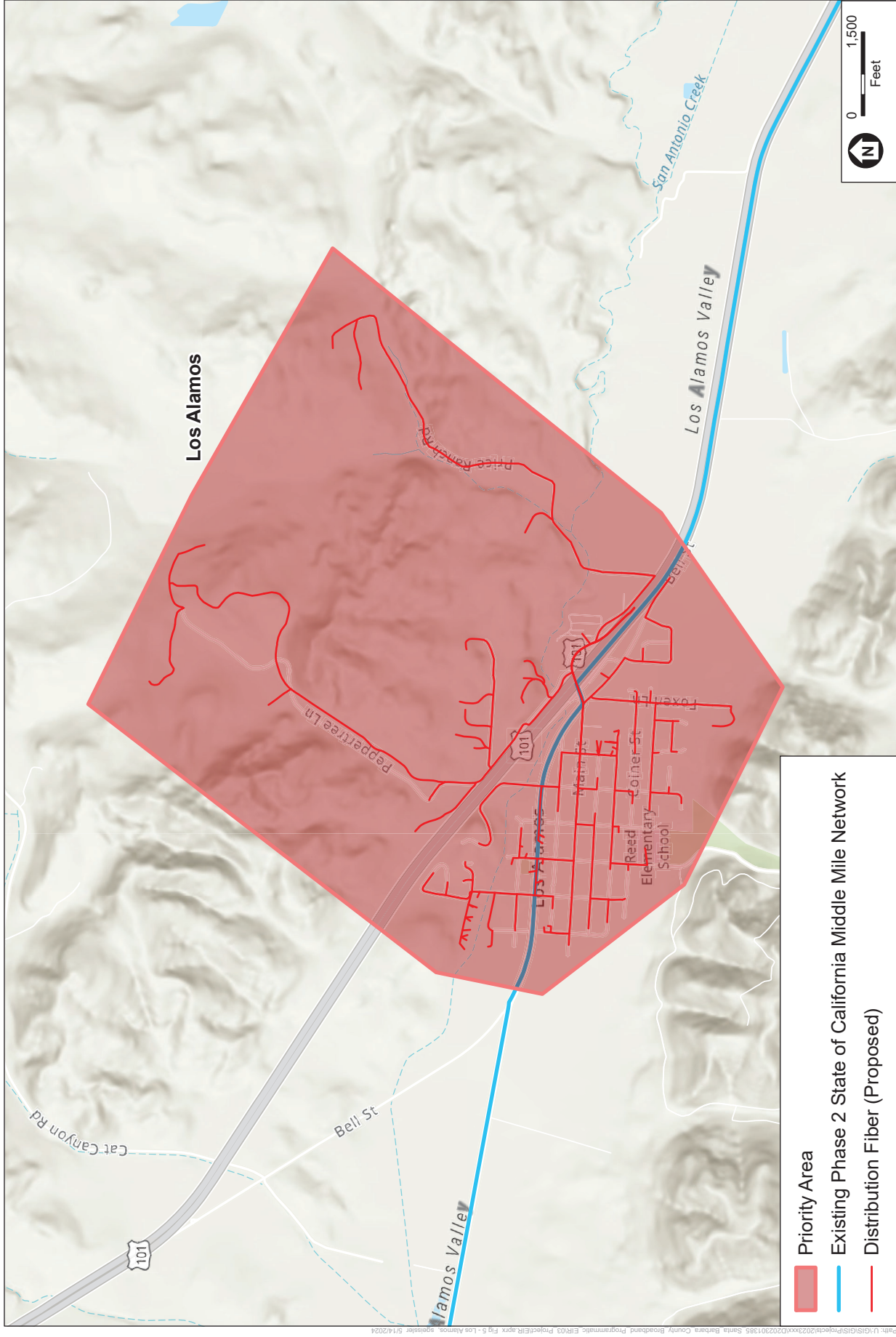
**Figure 3**  
Priority Area – Guadalupe



SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

**Figure 4**  
Priority Area – Casmalia

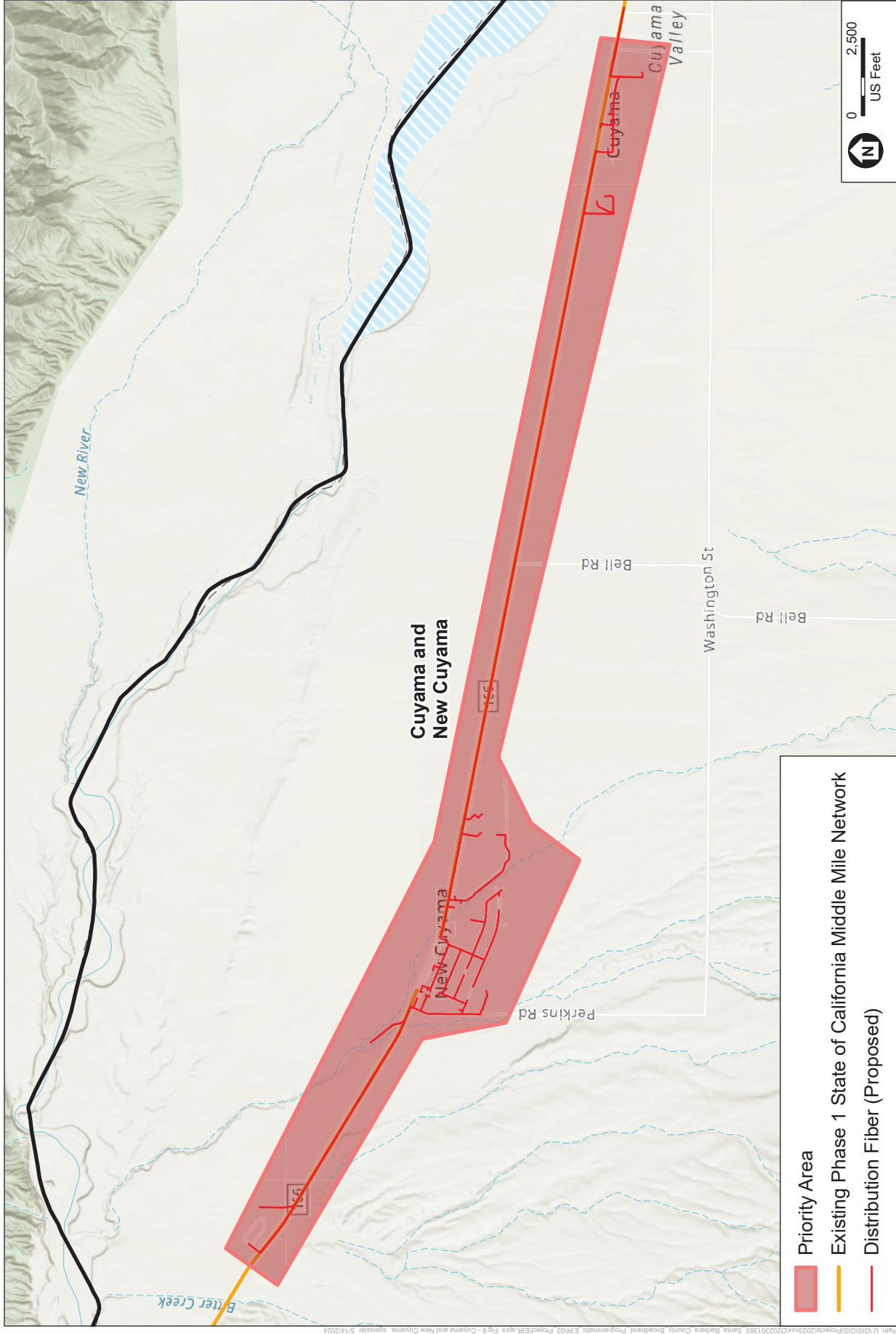


SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

**Figure 5**  
Priority Area – Los Alamos





SOURCE: ESA, 2024

Santa Barbara County Last-Mile Broadband Program

**Figure 6**  
Priority Area – Cuyama and New Cuyama

## Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics                           | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources      | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils                        | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials                 |
| <input type="checkbox"/> Hydrology/Water Quality              | <input type="checkbox"/> Land Use/Planning                   | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                  | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                           | <input type="checkbox"/> Transportation                      | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Fred Luna*

Signature

May 21, 2024

Date

# Environmental Checklist

## Aesthetics

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>I. AESTHETICS</b> — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

The County's Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as "especially important" visual resources. A project may have the potential to create a significantly adverse aesthetic impact if it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private, views.

- a) **Less Than Significant Impact.** Although the specific site locations of and engineering designs for future broadband installations have not yet been determined with the exception of the initial four Priority Areas, it is anticipated that the proposed new fiber optic lines and appurtenances would be predominantly installed underground typically adjacent to public or private roadways to the extent feasible (i.e., within previously disturbed shoulder areas or parallel utility easements, where available), with the intention being to minimize or avoid disturbance of paved roadway surfaces wherever practicable, or along existing utility poles where feasible and appropriate. Related above-ground features including equipment boxes and small isolated modular buildings would be limited in number and proposed structures would not exceed 12 feet in height. The buildings would be designed in accordance with applicable development standards and design guidelines including landscaping and lighting requirements, in order to minimize the visual effects of these features. While many public locations within the County offer views of scenic resources, including views from public roads and trails or other accessible public property both County-wide and specifically within the nine Priority Areas, given the nature of the proposed improvements, which consist of buried and pole-mounted fiber optic cable and associated appurtenances including above-ground equipment boxes and limited small modular structures, the overall visual effects of construction and operation of the Project would not be substantial. It



should be noted that one of the Refugio Canyon Priority Area intersects with the County's Critical Viewshed Corridor (CVC) Overlay zone, which traverses the three project footprints in this Priority Area in an east-west direction along Highway 101. However, the installation of broadband facilities within the Refugio Canyon Priority Area would not result in adverse impacts to views of the Pacific Ocean, Channel Islands, Santa Ynez Mountains, or other scenic resources from within the CVC Overlay zone since the proposed improvements would not obstruct or detract from views of scenic resources given their limited footprint and chiefly underground installation methods. Similarly, the Santa Barbara County Environmental Resource Management Element (ERME) summarizes various environmental factors analyzed in the Seismic Safety, Conservation, and Open Space Elements, and relates these factors to proposals on County open space preservation (County of Santa Barbara, 2009). According to the Santa Barbara County Land Use and Zoning Map, portions of the Los Alamos, Jonata Park, Los Olivos, Refugio Canyon, Highway 246 Corridor, East of Santa Maria, and New Cuyama and Cuyama Priority Areas are located within the ERME Scenic Corridor (County of Santa Barbara, 2024a). These scenic corridors are classified as having the highest scenic values and urbanization could be permitted only in appropriate instances, subject to project plan review and imposition of specific conditions to protect against hazards and preserve the integrity of the land and environment (County of Santa Barbara, 2009). As discussed above, the Project consists of future broadband infrastructure installations including utility poles, which mainly consist of underground infrastructure, with very little, if any, above-ground improvements such that adverse visual effects within the ERME Scenic Corridor would occur.

While construction activities (construction vehicles, workers, equipment storage and staging areas, signage, fencing, parking areas, etc.) would likely affect localized views in any given area for a limited period of time, such adverse effects on any visible resources would cease upon completion of construction activities. Long-term operational visual effects of the proposed broadband installations would be limited to those associated with the visible above-ground features, which would consist of narrow-gauge cable and limited small equipment boxes and structures, none of which would have the potential to obstruct or substantially detract from the available views of scenic resources in the affected portions of the County. As such, the Project would not have a substantial effect on a scenic vista, nor would it change the visual character of an area that may have scenic views. Therefore, no further analysis is warranted in the EIR.

- b) **Less Than Significant Impact.** Various state scenic highways are located throughout Santa Barbara County including U.S. 101 (Eligible and Officially Designated), State Route (SR) 150 (Eligible), SR 154 (Officially Designated), SR-1 (Eligible), and SR-166 (Eligible) (Caltrans 2024). As noted in Response I. a), above, Project components would include installation of fiber optic cable predominantly located underground in buried conduits and would require only limited above-ground structures. However, when underground installation is determined to not be feasible for specific locations, pole-mounting of cable would also be implemented either on existing utility poles or on newly installed poles. Although the future broadband installations could occur in the vicinity of both eligible and officially designated scenic highways, the Project is not expected to substantially damage any scenic resources. This is due to the fact that, as noted above, construction is anticipated to occur predominantly adjacent to existing public or private roadways, and thus the proposed alignments would generally avoid sensitive habitats or specimen

trees, outcroppings, and historic buildings. Given the relatively small construction footprint of broadband facility installations, as well as the limited visual effect of proposed facilities once constructed, substantial adverse impacts to scenic resources within a state scenic highway are not anticipated to occur, and no further analysis will be included in the EIR.

- c) **Less Than Significant Impact.** Broadband installation could occur in both urbanized and non-urbanized areas; however, the nine Priority Areas that have been identified are primarily within non-urbanized areas. As noted in Response I. a), above, the Project would primarily include installation of underground infrastructure in buried conduits, with installation via pole mounting utilized to a lesser extent where feasible, and limited construction of small above-ground structures where necessary. The presence of construction equipment, workers, and materials could temporarily impact views in discrete locations during construction activities; however, construction worker parking, material stockpiling, and equipment staging and storage would occur within appropriate locations for each future broadband installation project, and would be temporary in nature such that any adverse visual effects would only occur for a limited period of time in any given location within the County. As also discussed in Response I.a., above, operational impacts of the Project with regard to scenic vistas and views of identified scenic resources would be less than significant. The Project is not anticipated to substantially degrade the existing visual character or quality of public views and is also not anticipated to include visually incompatible structures, as any necessary above-grade structures that could potentially affect the visual character or quality of views of the area would be limited in size and scale and would be designed and constructed in accordance with applicable development standards and design guidelines. This issue will not be analyzed further in the EIR.
- d) **Less Than Significant Impact.** Substantial daytime or nighttime glare-producing surfaces or night lighting are not proposed given that the majority of the proposed installations would consist of buried cable and associated appurtenances, or pole-mounted relatively narrow-gauge fiber optic cable. In addition, any above-ground permanent structures anticipated to be constructed would not include notable expanses of windows or other reflective surfaces (as these buildings only house computer network equipment with no human occupancy), and as noted previously would be limited in size and scale and designed and constructed in accordance with applicable development standards and design guidelines, including applicable lighting standards. Therefore, no substantial adverse visual impacts associated with Project-related changes in glare or night lighting would occur, and no further analysis is warranted in the EIR.

## References

- Caltrans Scenic Highway Map System. Accessed online April 18, 2024 via <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>
- County of Santa Barbara, 2009. Environmental Resource Management Element (ERME). Available at: <https://www.countyofsb.org/966/Environmental-Resource-Management>. Accessed April 2024.

## Agriculture and Forestry Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>II. AGRICULTURE AND FORESTRY RESOURCES —</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** Areas subject to future broadband facility installations include the entire County of Santa Barbara, and the Priority Areas generally consist of various communities across the County that are currently underserved or unserved by high-speed broadband internet services. Many of the Priority Areas are located adjacent or in proximity to active agricultural land or grazing land. According to the California Department of Conservation (DOC)'s Farmland Mapping and Monitoring Program, while the majority land within the nine Priority Areas is designated as Urban and Built-Up Land or Other Land, and thus is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, some portions of the affected communities contain land engaged in agricultural operations or designated as farmland as defined by the DOC (DOC 2022). While some areas that could be physically affected by future projects that will be implemented as part of the Broadband Program contain designated farmland and agricultural operations, it is not anticipated that implementation of broadband installations would result in the conversion of notable amounts of farmland in the County. This is because, as noted previously, the majority of the broadband infrastructure to be constructed would be installed underground following public and private roadways, which would limit the construction footprint to previously disturbed areas or would be mounted to existing or newly installed utility poles where necessary. Other appurtenances such as above- and below-grade vaults and equipment boxes and small modular structures would be very limited in terms of

disturbance footprint. As such, construction of future broadband facilities, including the installations within the nine Priority Areas, would not result in the conversion of measurable amounts of farmland to non-agricultural use. Once constructed, the Project would not impair agricultural land productivity, as broadband facilities would have little to no potential to result in other physical effects on agricultural land or operations. Therefore, implementation of the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, to non-agricultural use; impacts would be less than significant, and no further analysis is warranted in the EIR.

- b) **No Impact.** The Project area is characterized by a wide range of land use and zoning designations across the various jurisdictions, including zoning for agricultural activities such as crop production, grazing, and wine production. Within the nine Priority Areas the land use pattern is predominantly single-family residential (County of Santa Barbara 2024). The Project would not result in the need to modify land use plans or rezone any land within the Project Area, since the proposed broadband installations are very limited in scale and physical footprint and are considered utility improvements that serve all urban land use types and thus are permitted in nearly all land use and zoning designations.

As discussed above in Response II.a), while numerous agricultural uses occur within or adjacent to future broadband sites including the nine Priority Areas, future projects are anticipated to be constructed primarily along roadways and within other public rights-of-way such as utility easements or other appropriate alignments such that conflicts with agricultural zoning or activities does not occur. Similarly, although portions of the Project Area may be enrolled in a Williamson Act contract, the proposed installations would have little potential to result in changes to such contracts or associated agricultural operations on affected parcels. Therefore, implementation of the Project would not conflict with an existing zoning for agricultural use, or a Williamson Act contract, and no further analysis is warranted in the EIR.

- c) **No Impact.** As discussed in Response II.b) above, the Project would result in the future installation of broadband infrastructure to serve unserved and underserved populations, many of which are located in more rural portions of the County where such infrastructure has not yet been constructed. Such rural areas may intersect with land located within the Los Padres National Forest. Of the nine Priority Areas, only one (Refugio Canyon) intersects with National Forest land. No portion of the County is designated as timberland or zoned Timberland Production. Although limited portions of the County where future projects that will be implemented as part of the Broadband Program would occur are located within or proximate to designated forest land, the Project would not result in any land use or zoning changes, and the majority of facilities to be constructed would be installed underground following public and private roadways. Accordingly, the Project would not result in the potential to affect forest land zoning and is not anticipated to impact forest land or timberland. Therefore, implementation of the Project would not cause rezoning of forest land, timberland, or timberland zoned Timberland Production, and no further analysis is warranted in the EIR.

- d) **Less Than Significant Impact.** As discussed above, the affected area for potential future broadband facility installations under the proposed Broadband Program includes the entire County, which includes forest land within the Los Padres National Forest. The nine Priority Areas are located within less populated but generally urbanized portions of the County, with the northern portion of the Refugio Canyon Priority Area located within the Forest itself. . However, since the majority of proposed broadband facilities would be installed underground along roadways or within previously disturbed or developed areas (including small above- or below-ground appurtenances), or alternatively installed along existing or proposed utility poles, the potential to substantially affect forest land is considered minimal. . Therefore, implementation of the Project would not result in the substantial loss of forest land or conversion of forest land to non-forest use, and no further analysis is warranted in the EIR.
- e) **No Impact.** See Responses II.a) and II.b), above. The Project Area, including the nine Priority Areas are located in a generally urbanized setting but adjacent or proximate to agricultural and forest land. However, since the proposed future broadband installations are anticipated to predominantly be constructed along public or private roadways, or within other previously disturbed or developed areas, with a minimal construction footprint, implementation of the Project is not expected to result in the conversion of agricultural land or forest land to non-agricultural and non-forest use. Therefore, implementation of the Project would not result in the conversion of Farmland to non-agricultural use or the conversion of forest to non-forest use, and no further analysis is warranted in the EIR.

## References

County of Santa Barbara, 2024. Santa Barbara County Land Use and Zoning Map. Available at: <https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=0f24610ca52d4e28b12e2d76bf61d5ec>. Accessed April 2024.

Department of Conservation (DOC), 2022. California Impact Farmland Finder. Available: <https://maps.conservation.ca.gov/dlrp/ciff/>. Accessed April 2024.

## Air Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>III. AIR QUALITY —</b>				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Air pollution control is administered on three governmental levels. The U.S. Environmental Protection Agency (USEPA) has jurisdiction under the Clean Air Act, the California Air Resources Board (CARB) has jurisdiction under the California Health and Safety Code and the California Clean Air Act, and local districts (Santa Barbara County Air Pollution Control District [APCD]) share responsibility with the CARB for ensuring that all State and Federal ambient air quality standards are attained.

The Project is situated in the South Central Coast Air Basin, which encompasses the counties of Ventura, Santa Barbara and San Luis Obispo. Santa Barbara County has been designated as unclassifiable/attainment for all California and Federal ambient air quality standards except the California standards for ozone and particulate matter (PM10).

The 2022 Ozone Plan (2022 Plan) was adopted by the APCD's Board of Directors in December 2022 and is the tenth triennial update to the initial state Air Quality Attainment Plan (other updates were done in 1994, 1998, 2001, 2004, 2007, 2010, 2013, 2016, and 2019). Each of the plan updates have implemented an "every feasible measure" strategy to ensure continued progress toward attainment of the state ozone standards. Since 1992, Santa Barbara County has adopted or amended more than 30 control measures aimed at reducing emissions from stationary sources of air pollution. These measures have substantially reduced ozone precursor pollutants, which includes NO<sub>x</sub> and ROC.

The 2022 Plan growth forecasts are generally based on SBCAG's growth forecasts, and since SBCAG's regional growth forecasts are based on, among other things, land uses designated in general plans and specific plans, a project that is consistent with the land uses designated in a general plan would also be consistent with the 2022 Plan growth projections. The Project includes installation of broadband facilities in order to provide better internet access throughout the County and would not be anticipated to increase population beyond that projected in the County's Comprehensive Plan. Therefore, the Project would not result in population growth that would



exceed the regional forecast and would not conflict with the 2022 Plan, so impacts would be less than significant.

The Air Quality Supplement to the Land Use Element of the Santa Barbara County Comprehensive Plan, republished in 2009, provides land use control measures and policies related to air quality. The main goal that is applicable to the Project includes the following (County 2009).

Goal: Significant increases in the use of bicycles, walking, and transit; and reduced use of the automobile.

The Air Quality Supplement notes that “any action that can be taken to reduce automobile use and hence vehicular miles traveled (VMT) will aid in reducing the pollutants contributed by the automobile” (County 2009, page 20). Although many of the policies and actions are more related to the jobs-housing balance within communities, or the availability of bike lanes and transit, the availability of broadband within more rural communities also has the potential to reduce VMT through providing remote work opportunities.

Project construction is not anticipated to generate significant environmental impacts associated with air quality compliance, and the Project would comply with the Comprehensive Plan policies. However, this issue will be analyzed further in the EIR to ensure that the Project complies with all General Plan and Comprehensive Plan policies throughout the County and its individual jurisdictions.

b) **Potentially Significant Impact.** The Santa Barbara County APCD has established Environmental Review Guidelines for the implementation of CEQA (County APCD 2015). The Environmental Review Guidelines provide specific thresholds for air quality emissions as well as greenhouse gas emissions, related to the operation of a Project. The thresholds state that a project would not have a significant impact if it would:

- emit (from all project sources, mobile and stationary) less than the daily trigger for offsets set in the APCD New Source Review Rule for any pollutant and
- emit less than 25 pounds per day of oxides of nitrogen (NOx) or reactive organic compounds (ROC) from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state Air Quality Plans.

The maximum daily emissions of air pollutants during construction of the Project will be calculated in the EIR. The operational emissions from the Project including maintenance trips will also be analyzed in the EIR, to compare to thresholds for the County.

As discussed earlier, the Santa Barbara County APCD has developed a comprehensive plan, the 2022 Plan, which addresses the region’s cumulative air quality condition. CEQA Guidelines

Section 15064(h)(3) also provides guidance in determining the significance of cumulative impacts. The EIR will include analysis of potentially cumulative impacts from any related projects near the Project site.

- c) **Potentially Significant Impact.** Sensitive receptors are individuals who are considered more sensitive to air pollutants than others. The reasons for greater than average sensitivity may include pre-existing health problems, proximity to emissions sources, or duration of exposure to air pollutants. Schools, hospitals, and convalescent homes are considered as relatively sensitive to poor air quality because children, elderly people, and the infirm are more susceptible to respiratory distress and other air quality-related health problems than the general public. Residential areas are considered sensitive to poor air quality because people usually stay home for extended periods of time, with associated greater exposure to ambient air quality.

Since the Project will be occurring throughout the County, there is potential for various sensitive receptors to be located close to future Project sites. However, since air emissions disperse rapidly in the environment and decrease with distance from the source, exposure associated with emissions from construction activities would be limited and temporary in nature. Potential impacts to sensitive receptors, including impacts associated with excessive dust, will be further analyzed in the EIR.

### ***CO Hotspots***

Emissions of CO are generated in greatest quantities from motor vehicle combustion of fossil fuels and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Impacts related to CO hotspots will be further analyzed in the EIR.

### ***Localized Air Quality Impacts – Toxic Air Contaminants***

Toxic air contaminants (TACs) are generally defined as those contaminants that are known or suspected to cause serious health problems, but which do not have a corresponding ambient air quality standard. TACs are also defined as air pollutants that may increase a person's risk of developing cancer and/or serious health effects; however, the emission of a toxic chemical does not automatically create a health hazard. Potential impacts regarding TACs will be analyzed in the EIR.

- d) **Less Than Significant Impact.** During the construction of the Project, diesel trucks and off-road construction equipment may emit odors such as that of diesel exhaust. Such odors would be a temporary source of nuisance to adjacent uses but would not affect a substantial number of people. As odors associated with construction would be temporary and intermittent in nature, the odors would be considered a less-than-significant impact.

uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.



The Project would not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. In addition, the Project would not result in the creation of smoke or ash, or excessive dust generation. Therefore, objectionable odors would not be emitted by the proposed uses.

## References

Santa Barbara County Comprehensive Plan, Air Quality Supplement to the Land Use Element. Republished in 2009. Accessed online April 19, 2024 via <https://cosantabarbara.app.box.com/s/mp4ztmr4r9dda9il22fk93nl>.

Santa Barbara County Air Pollution Control District. 2022 Ozone Plan. Accessed online April 18, 2024 via <https://www.ourair.org/wp-content/uploads/2022-Ozone-Plan.pdf>.

Santa Barbara County Air Pollution Control District. Environmental Review Guidelines. Revised April 30, 2015. Accessed online April 19, 2024 via <https://www.ourair.org/wp-content/uploads/APCDCEQAGuidelinesApr2015-1.pdf>.

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## Biological Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IV. BIOLOGICAL RESOURCES — Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Impact Discussion

- a) **Potentially Significant Impact.** The Project proposes future broadband infrastructure installations in various communities across the County. These installations would include mostly underground fiberoptic cable facilities which are intended to reach end users in underserved or unserved communities, with a possibility for some limited above-ground fiber optic cable installations. Since underground installation are anticipated to occur along existing roadways, or within previously disturbed areas, the Project would have limited potential to impact habitat including critical habitat for special-status wildlife and sensitive plant communities, or unique or threatened plant communities, throughout the County. During construction, potential removal of vegetation and habitat, including non-native vegetation, as well as use of heavy equipment within the Priority Areas and future areas throughout the County, could result in impacts to biological resources, including special status, sensitive plant communities, and migratory birds protected under the Federal Migratory Bird Treaty Act of 1918 and Section 3513 of the California Fish and Game Code. Operation and maintenance activities, including vegetation removal, and erosion repair in some areas, could have the potential to affect special-status plants, wildlife species, and sensitive plant communities due to the extent and type of work associated with the Project. In addition, unique, threatened, or rare plant communities could be impacted during construction and vegetation maintenance related to operation, if necessary. Therefore, Project implementation

would have a potentially significant impact to special-status species and further analysis of this issue is warranted in the EIR.

- b) **Potentially Significant Impact.** As discussed in the Project Description, the Project proposes future broadband infrastructure installations in various communities throughout the County, including the nine Priority Areas, as well as future projects throughout the County whose locations have yet to be determined. The four near-term Priority Areas would be constructed in four phases (each Priority Area project representing a single phase) over a period of 24 months. In Santa Barbara County, riparian habitat occurs in and along the County's four major rivers (Santa Ynez, Santa Maria, Cuyama, and Sisquoc) and in and along the County's many creeks and streams. However, the Project would not involve pesticides, animal life, human life, or non-native plants that would interfere with existing habitat. According to the National Wetlands Inventory Mapper, all nine of the Priority Areas are located within areas that contain one or more protected wetland resources (USFW 2023). Accordingly, the Project could have the potential to affect nearby creeks and streams which support riparian habitat and sensitive natural communities. Additionally, according to the Santa Barbara County Land Use and Zoning Map, the Priority Areas do not traverse through the Environmental Sensitive Habitat (ESH) and Riparian Corridor (RC) Overlays in the County (County of Santa Barbara 2024). Construction of the future broadband infrastructure installations could require removal of vegetation and could potentially impact riparian habitat. Operation and maintenance of the broadband infrastructure installations could require brush and weed removal which could affect riparian habitat. Therefore, implementation of the Project could have a potentially significant impact to riparian habitat, or other sensitive natural communities and further analysis of this issue is warranted in the EIR.
- c) **Potentially Significant Impact.** According to the National Wetlands Inventory Mapper, the nine Priority Areas contain protected wetlands, mainly consisting of natural creek drainages and small wetlands and freshwater ponds (USFW 2023). Additionally, the Project would potentially affect other areas throughout the County beyond the nine noted Priority Areas, which could have the potential to affect nearby creeks and streams that support riparian habitat and sensitive natural communities. As such, the Project could have potential impacts to riparian habitat or other sensitive natural community during construction and operation activities. Therefore, implementation of the Project would have potentially significant impacts and further analysis of this issue is warranted in the EIR.
- d) **Potentially Significant Impact.** Wildlife corridors are features that exist as topographical or structural pinch points that, among other purposes, are utilized by wildlife for travel between one geographical area to the next. While these resources may support limited biological function and are perhaps utilized strictly for travel purposes, for example, a dry culvert under a roadway or bridge; more often, they contain natural vegetation and habitats that support foraging, roosting, and breeding activities, as well. Very often, particularly in the case of riparian corridors, aquatic species depend entirely on these features to persist. Wildlife corridors and designated essential connectivity areas are present throughout Santa Barbara County. None of the Priority Areas are located within a designated wildlife corridor (CDFW 2023a); however, future projects could occur throughout the County, but would be primarily located along public and private roadways. Since Project components would almost entirely be located underground with limited above-

ground improvements proposed, and thus no substantial barriers to wildlife movement are anticipated to result from Project implementation. However, given other factors that could reduce wildlife movement including fencing, noise, or lighting, which would potentially occur during construction activities for broadband installation, impacts are considered potentially significant.

Additionally, construction activities could require tree removal within each of the nine Priority Areas and may also require tree removal in other future project areas. However, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Additionally, California Department of Fish and Game Code 3513 provides protection to the birds listed under the MBTA, essentially all native birds. Other Fish and Game Codes provide further protection to certain types of birds, such as raptors. While these regulations are generally protective of nesting and migratory birds, there is the potential given the unknowns regarding the nature and location of future construction work that impacts to migratory species could occur. Therefore, implementation of the Project could have a potentially significant impact on wildlife corridors and further analysis of this issue is warranted in the EIR.

- e) **Potentially Significant Impact.** Implementation of the Project could require the removal and encroachment of protected trees, although the exact number is unknown since future projects could occur throughout the County. At the time of this Initial Study, Project plans are in a preliminary stage and full impacts to protected and native specimen trees are unknown. However, as construction activities could require vegetation and tree removal, the Project would have the potential to impact biological resources. Therefore, implementation of the Project would have a potentially significant impact on local policies or ordinances protecting biological resources and further analysis of this issue is warranted in the EIR.
- f) **Potentially Significant Impact.** The nine identified Priority areas do not have any adopted local, regional, or state Natural Community Conservation Plans that are applicable, as none are adopted for Santa Barbara County (CDFW 2023b). However, there are several other conservation plans and programs intended to address habitat conservation for various threatened and endangered species. Therefore, implementation of the Project would have the potential to conflict with adopted conservation plans and further analysis of this issue is warranted in the EIR.

## References

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County of Santa Barbara, 2024. Santa Barbara County Land Use and Zoning Map. Available at: <https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=0f24610ca52d4e28b12e2d76fb1d5ec>. Accessed April 2024.

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## Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>V. CULTURAL RESOURCES —</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** Under CEQA, a project may have a significant effect on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (Public Resources Code Section 21084.1; 14 California Code of Regulations (CCR; henceforth referenced as CEQA Guidelines) 15064.5(b)). If a site is listed or eligible for listing in the California Register of Historical Resources (CRHR), or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of Public Resources Code Section 5024.1(q)), it is a historical resource and is presumed to be historically or culturally significant for the purposes of CEQA (CEQA Guidelines Section 15064.5(a)).

As discussed, the Project proposes future broadband infrastructure installations in order to provide adequate high-speed broadband internet services to the Priority Areas and other areas throughout the County. A Cultural Report is being prepared, which will include analysis of any potential historic resources within the Priority Areas, and other potential future project areas in the County. Due to the nature and extent of the Project, construction and regular maintenance activities for the broadband infrastructure could have a potential to impact cultural resources within the Priority Areas and in future project areas throughout the County. Therefore, implementation of the Project could have potentially significant impact to historical resources and further analysis of this issue is warranted in the EIR.

- b) **Potentially Significant Impact.** Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project proposes future broadband infrastructure installations within the Priority Areas, which have been identified as underserved or unserved communities. Construction activities would include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but could be up to two feet by six feet) and would be temporary in nature, with the ground surface and any paving or landscaping restored to pre-project conditions once construction is complete. Although the maximum depth of excavation is likely to be to a depth of only four feet, the construction of the future installations could cause inadvertent discovery of archaeological resources beneath the potential project areas. Therefore, implementation of the

Project would have potentially significant impact to an archaeological resource and further analysis of this issue is warranted in the EIR.

- c) **Less Than Significant Impact.** As previously indicated, the Project proposes future installations countywide, initially within the four identified Priority Areas. Nevertheless, the Project would require excavation that could extend into native soils, with the potential to encounter previously unknown human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of unrecorded human remains during construction, excavations shall be halted, and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission (NAHC) would be notified within 24 hours and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with these regulatory protocols would ensure that impacts on human remains would be less than significant and therefore this issue is not warranted in the EIR.

## References

N/A

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## Energy

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VI. ENERGY —</b> Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The Project would result in energy demand from the use of construction equipment for a temporary period, which for the initial four Priority Areas would occur over a duration of approximately 24 months (with comparable durations of construction assumed for future projects elsewhere in the County). Energy demand from the use of transportation fuels from construction activities would be generated by the operation of vehicles and equipment used for various construction activities, such as excavation and grading. Electricity would be consumed to power the construction sites, conveyance of water for dust control, and any electrically driven construction equipment. Construction-related energy and transportation fuel demand from construction equipment would vary depending on factors such as the type and number of equipment and the time duration that each equipment is powered on and used. Electricity would only be used for necessary construction-related activities and would be limited to working hours. Natural gas would not be consumed during construction of the future installations of the Project. Construction equipment and trucks would be required to comply with applicable provisions of regulations to improve fuel efficiency. Furthermore, trucks would need to comply with the 2004 CARB Airborne Toxic Control Measure (ATCM) (CARB 2004a) to limit heavy-duty diesel motor vehicle idling to 5 minutes or less at any given location. However, due to the nature and extent of the future installations, construction of the Project could result in potentially significant impacts pertaining to the wasteful, inefficient, or unnecessary consumption of transportation fuel resources and further analysis of this issue is warranted in the EIR. In addition, the EIR will analyze whether construction of the Project will create an increase in energy demand, especially during peak hour periods, and whether the Project would create a need to expand new sources of energy.

Operation of the Project would generate periodic trips from maintenance workers traveling to and from the potential project areas. Given the nature of the Project, additional trips would result in an increase in vehicle fuel usage by construction workers. During operation of the Project, electricity would be consumed during routine maintenance, but such electricity usage would be minimal. No natural gas would be used during operational activities. Given the energy consumption of the Project, operation and routine maintenance trips from maintenance workers would result in an increase in energy consumption and could result in the wasteful, inefficient, or unnecessary consumption of electricity resources. Therefore, implementation of the Project would result in potentially significant impacts and further analysis of this issue is warranted in the EIR.

- b) **Potentially Significant Impact.** During construction, the Project would include energy consumption sources that are directly subject to state or local energy efficiency plans. On-road and off-road vehicles used during construction would be required to meet the ongoing federal and state fuel efficiency requirements. Additionally, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes per occurrence. These limitations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy. As previously discussed, the Project proposes future broadband infrastructure installations in various communities throughout the County and construction of such installations would require energy consumption initially over a period of approximately 24 months for the first four Priority Areas. Due to the extent and nature of the Project, it is unknown at the time of this Initial Study the amount of energy consumption generated by the Project. Thus, implementation of the Project could conflict with or obstruct a state or local plan for renewable energy or energy efficiency and further analysis of this issue is warranted in the EIR.

## References

N/A

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## Geology and Soils

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VII. GEOLOGY AND SOILS —</b> Would the project:				
a) 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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a.i) **Less Than Significant Impact.** Fault rupture is a plane or surface in the earth where failure has occurred and materials on opposite sides have moved relative to one another in response to the accumulation and release of stress. The U.S. Geological Survey defines active faults as those that have had surface displacements within the Holocene epoch (about the last 11,000 years). Potentially active faults are those that have had surface displacement during the Quaternary period, within the last 1.6 million years. The Project areas are located within an area of the Central Coast Region with numerous active and potentially active faults of the north-northwest trending San Andreas Fault system and the east-west trending Transverse Ranges Fault System.

As mentioned above, the Project proposes future broadband infrastructure installations in various communities throughout the County, however, the specific locations of future broadband facility installations are currently not known, with the exception of the nine identified Priority Areas. Based on the Alquist-Priolo Earthquake Fault Zones Map, the Priority Areas are not located within an Alquist-Priolo Special Study Zone (CGS, 2024a). However, the Los Alamos Priority Area is in proximity to the Zaca Creek Alquist-Priolo Earthquake Fault, located east of the

community, and the East of Santa Maria Priority Area intersects with segments of the Bradley Canyon Fault, Garey Fault, and Foxen Canyon Fault (CGS, 2024a).

In Casmalia, the major fault strands bordering the community are the Casmalia Fault to the north and northwest and Lions Head Fault (Late Quaternary) to the east and south (CGS, 2024a). There are no major fault strands bordering or within proximity to the City of Guadalupe and New Cuyama/Cuyama (CGS, 2024a). The Project consists of the installation of broadband infrastructure throughout various communities within the County and would not include development of any habitable structures or any development that would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death. In addition, the Project does not include substantial soil disturbance beyond trenching; and extensive grading, removal of topsoil, extraction of mineral ore, creation of excessive spoils, and permanent changes to topography would not occur. In addition, all proposed improvements would be carried out in accordance with applicable regulations and design standards to address seismic safety for infrastructure installations. Therefore, implementation of the Project would cause less than significant impacts. No further analysis of this issue is warranted in the EIR.

- a.ii) **Less Than Significant Impact.** The Project areas are located in Central Coast Region of California, an area that is subject to seismic ground shaking. Seismically induced ground acceleration is the shaking motion that is produced by an earthquake. As noted in Response VII.a.i) above, based on the Alquist-Priolo Earthquake Fault Zones Map, the identified Priority Areas are not within an Alquist-Priolo Special Study Zone (CGS, 2024a). While some of the Priority Areas are located near or intersect with known active faults in the region, the Project consists of the installation of broadband infrastructure throughout various communities within the County and would not include construction of any habitable structures or any development beyond installation of cables underground or on above-ground utility poles and associated appurtenances including utility vaults and boxes and limited modular equipment structures. The proposed Project would largely operate passively once constructed and operation of the proposed broadband facilities would have little potential to result in substantial adverse effects, including the risk of loss, injury, or death involving seismic ground shaking. As such, implementation of the Project would result in less than significant impacts related to strong seismic shaking. No further analysis is warranted in the EIR.
- a.iii) **Less Than Significant Impact.** Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced strong ground shaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of the granular sediments, and the magnitude and frequencies of earthquakes in the surrounding region. Saturated, unconsolidated silts, sands, and silty sands within 50 feet of the ground surface are most susceptible to liquefaction. Liquefaction-related phenomena include lateral spreading, ground oscillation, flow failures, loss of bearing strength, subsidence, and buoyancy effects. In addition, densification of the soil resulting in vertical settlement of the ground can also occur. This phenomenon can result in damage to infrastructure, including foundations.

The four Priority Areas are not located in a Seismic Hazard Area for liquefaction according to the California Earthquake Zones of Required Investigation Map (CGS, 2024b). Furthermore, the Project proposes future broadband infrastructure installations within various communities throughout the County, with no planned development of habitable structures. Therefore, implementation of the Project would not result in substantial adverse impacts as the Project does not propose construction of any habitable structures that can be affected by liquefaction and result in potential loss, injury, or death. No further analysis is warranted in the EIR.

- a.iv) **Less Than Significant Impact.** The geologic and topographic characteristics of an area often determine the potential for landslides. Landslides (or slope failures) are the dislodging and failing of a mass of soil or rocks along a sloped surface. Generally, small-scale slope failure typically occurs along stream banks, margins of drainage channels, and similar settings where steep banks or slopes occur, the relatively flat terrain of the Project areas minimizes this potential geologic hazard. The identified Priority Areas are not located in a Seismic Hazard Area for Landslide potential according to the California Earthquake Zones of Required Investigation Map (CGS, 2024b). Furthermore, the Project proposes future broadband infrastructure installations within various communities throughout the County, with limited, if any, above-ground structural development, and no habitable structures involved. The Project construction and grading activities would include open-trench construction and horizontal point-to-point underground boring and could include micro-trenching and/or aerial stringing from utility poles and excavations for boring pits, limited to a maximum of up to two feet by six feet. Given the topography of the known Priority Areas, the absence of proposed habitable or sizeable structural development, and the maximum excavation depths proposed, seismically induced landslides would not pose a danger to people or structures on-site or in the vicinity of future Priority Area projects. Therefore, implementation of the Project would result in less than significant impacts from landslides. No further analysis is warranted in the EIR.
- b) **Less Than Significant Impact.** The Project proposes future broadband infrastructure installations within various communities throughout the County, with no planned development beyond the installation of underground infrastructure and limited above-ground appurtenances and modular support structures to house network computer equipment. The Project construction and grading activities would include open-trench construction and horizontal point-to-point underground boring and may also include micro-trenching and/or aerial stringing from utility poles and excavations for boring pits, limited to a maximum of up to two feet by six feet. Ground disturbance for the installation of the utility poles would excavate a minimal amount of soil within each Priority Area as well as future project areas and would generally be located along public and private roadways. There is no planned development which would lead to soil erosion or the loss of topsoil. During construction, however, construction activities would be required to implement various requirements including those of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, Caltrans Stormwater Permit, or NPDES Municipal Separate Storm Sewer System (MS4) Permit including implementation of best management practices (BMPs), which would be utilized to reduce any potential erosion or loss of topsoil due to proposed construction activities or long-term maintenance activities associated with future projects. Therefore, implementation of the Project is not anticipated to result in substantial soil erosion or the loss of topsoil. No further analysis is warranted in the EIR.

- c) **Less Than Significant Impact.** Unstable geologic units or soils commonly occur when there is the potential for landslides, lateral spreading, subsidence/collapse, or liquefaction to occur in a given location.

### ***Landslides***

See Response VII.a.iv), above. The geologic and topographic characteristics of an area often determine the potential for landslides. Landslides (or slope failures) are the dislodging and failing of a mass of soil or rocks along a sloped surface. Generally, small-scale slope failure typically occurs along stream banks, margins of drainage channels, and similar settings where steep banks or slopes occur, the relatively flat terrain of the identified Priority Areas would generally minimize this potential geologic hazard. The identified Priority Areas are not located in a Seismic Hazard Area for Landslide potential according to the California Earthquake Zones of Required Investigation Map (CGS, 2024b). Furthermore, the Project proposes future broadband infrastructure installations within various communities throughout the County, with no planned development beyond the installation of buried broadband cables, pole-mounted cables, and limited below- and above-grade appurtenances including limited modular equipment structures. The Project construction and grading activities would include open-trench construction, horizontal point-to-point underground boring, and may also include micro-trenching and/or aerial stringing from utility poles and excavations for boring pits, limited to a maximum of up to two feet by six feet. Given the Project Area's general topography, absence of notable structural development, and the maximum excavation depths proposed, seismically induced landslides would not pose a danger to people or structures on-site or in the vicinity of future broadband installation projects. Therefore, implementation of the Project would result in less than significant impacts from landslides. No further analysis is warranted in the EIR.

### ***Lateral Spreading***

See Response VII.a.iii) above. Lateral spreading movement occurs when a soil mass slides laterally on liquefied soil layers, moving downslope or towards a free face. The identified Priority Areas are not located within a liquefaction hazard zone (CGS, 2024b). Additionally, the Project proposes future broadband infrastructure installations within various communities throughout the County, with no notable structural development and no habitable structures proposed. Given the Project nature and absence of proposed habitable structural development within the Priority Areas or elsewhere within the County, the Project would not result in substantial adverse impacts relating to lateral spreading. No further analysis is warranted in the EIR.

### ***Subsidence/Collapse***

Subsidence or collapse is the sinking of the ground surface caused by the compression of earth materials resulting from man-made activities such as groundwater or oil and gas withdrawal. The resulting compression typically occurs only once within affected soils and cannot be reversed or repeated due to fluctuations of the groundwater level. The National Earthquake Hazards Reduction Program (NEHRP) rates soils from hard to soft and gives the soils ratings from Type A through Type E, with the hardest soils being Type A, and the softest soils rated at Type E (Santa Barbara County 2017). According to the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, the soils in the County are type A-C, with some areas having type D (Santa



Barbara County 2017). Additionally, there is no evidence of significant subsidence or problems related to subsidence in the County; however, due to the limited information available, subsidence could be occurring in these areas but if so, it is not significant since no problems have been reported (Santa Barbara County 2023). As mentioned above, the Project proposes future broadband installations in various communities throughout the County, with very limited, if any, planned structural development, and no habitable structures proposed. However, the specific locations of the installations are currently not known beyond the nine Priority Area projects currently proposed. The Project construction and grading activities would include open-trench construction and horizontal point-to-point underground boring and may also include micro-trenching and/or aerial stringing from utility poles and excavations for boring pits, limited to a maximum of up to two feet by six feet. As such, the Project does not propose construction of any habitable structures that could be affected by subsidence and/or collapse. Therefore, implementation of the Project would result in less than significant impacts relating to subsidence/collapse. No further analysis is warranted in the EIR.

### ***Liquefaction***

As discussed above, liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition due to the effects of increased pore-water pressure. There is no historical evidence of liquefaction in the County, most of the low coastal plain and valley bottoms underlain by alluvium were given a moderate (2) rating with respect to liquefaction potential (Santa Barbara County 2023). As mentioned in Response VII.a.iii), above, none of the nine identified Priority Areas are located in a Seismic Hazard Area for liquefaction according to the California Earthquake Zones of Required Investigation Map (CGS 2024b). The Project proposes future broadband installations in various communities throughout the County, with no planned habitable structural development. However, the specific locations of the installations are currently not known aside from those within the nine Priority Areas. Nonetheless, compliance with applicable grading and engineering design requirements, which include remediation of liquefiable soils and other hazardous soil conditions, as recommended by requisite geotechnical investigations for future projects would preclude the potential for adverse physical effects associated with liquefaction. There is no presence of liquefaction hazards within the nine Priority Areas, and while future broadband installation projects may be located in areas susceptible to liquefaction, given the nature of Project-related improvements and construction methods employed (consistent with geotechnical investigation recommendations, where applicable), the Project is anticipated to result in less than significant impacts associated with liquefaction at future project sites. No further analysis is warranted in the EIR.

- d) **Less Than Significant Impact.** Expansive soil is characterized by a clay composition whereby clay particles expand dramatically upon wetting. Structures constructed on expansive soils require special design considerations that are identified within the California Building Code. According to the Seismic Safety and Safety Element, expansive soils are fairly common in the County and are present in areas of current development such as the foothills of the South Coast (Summerland to Gaviota) and the Santa Ynez Valley (vicinity of Los Olivos, Ballard, Santa Ynez) (County of Santa Barbara 2023). Portions of the nine Priority Areas, as well as potential future broadband installation project sites, may be located within areas susceptible to expansive soils. However, as



mentioned in Response VII.c), above, the Project proposes future broadband installations in various communities throughout the County, with no planned habitable structural development, and predominantly involving the installation of relatively small underground fiber optic cable in conduit with limited above-ground improvements and small modular equipment structures where necessary. All engineering design and construction methods for each project would be based on the results of soil investigations and geotechnical evaluation by licensed professionals and would include recommendations for soil remediation where necessary including removal of expansive soils. Therefore, given the limited nature and intensity of the proposed broadband installations and compliance with accepted grading and engineering design requirements, implementation of the Project would result in less than significant impacts associated with expansive soil materials. No further analysis is warranted in the EIR.

- e) **No Impact.** As noted above, the Project proposes future broadband installations in various communities throughout the County, with no planned habitable structural development that would necessitate the provision of sewer connections or on-site wastewater treatment systems. The Project does not involve the installation of any septic tanks or alternative wastewater disposal systems. Therefore, implementation of the Project would result in no impact related to soils incapable of adequately supporting the use of septic tanks or wastewater disposal systems. No further analysis is warranted in the EIR.
- f) **Potentially Significant Impact.** As discussed previously, the Project proposes future broadband installations in various communities throughout the County involving the installation of fiber optic cable in underground conduit or along existing or proposed utility poles, as well as associated below- and above-grade appurtenances and minor modular structures. Aside from the nine Priority Areas, the specific locations of future broadband installations are currently not known and thus, at the time of this Initial Study, a paleontological resources database search was not conducted.

However, based on the Seismic Safety and Safety Element, the County is underlain by up to 35,000 feet of marine sedimentary rocks of late Mesozoic and Cenozoic ages. The sedimentary rocks are diverse but are dominated by great thickness of sandstone and shale with lesser amounts of conglomerate, alluvial fan deposits, dune sand, and diatomite (Santa Barbara County 2023). Additionally, based on the Society of Vertebrate Paleontology, the geologic types in the County could have the potential for paleontological resources (SVP 2024).

The Project proposes future broadband installations in various communities throughout the County, with no limited structural development. However, the specific locations of the installations are currently not known, other than for the four near-term Priority Area projects, though for all future projects in the County the likely general location of broadband installations being along existing public and private roadways. Should paleontological resources be encountered during construction activities, the Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Given the widespread potential for Project-related excavations to encounter geologic formations with high sensitivity for fossil resources, the Project could result in potentially significant adverse impacts to paleontological resources and thus this issue will be further analyzed in the Cultural Resources section of the EIR.

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## Greenhouse Gas Emissions

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>VIII. GREENHOUSE GAS EMISSIONS</b> — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The Project proposes future broadband infrastructure installations in communities throughout the County. The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. During construction, the Project would generate greenhouse gas (GHG) emissions through the use of construction vehicles and equipment, haul trips, and transport of workers and materials to and from the construction sites. During operation, the Project would not be expected to substantially increase GHG emissions as only minimal routine maintenance would be required. Due to the limited information pertaining to GHG emissions analysis available at the time of this Initial Study, construction and operation GHG emissions generated by the Project could either directly or indirectly have a significant impact on the environment. Therefore, implementation of the Project would have potentially significant impacts and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** As previously discussed, due to the limited information available pertaining to GHG emissions at the time of this Initial Study, the Project could conflict with an applicable plan, policy or regulation of an agency adopted for the purposes of reducing GHG emissions. The Project proposes future broadband infrastructure installations in various communities throughout the County, which would generate GHG emissions over the length of the respective construction period for each project. However, due to the nature of the Project, such GHG emissions could conflict with applicable plans, policies, or regulations adopted for the purpose of reducing emissions GHGs. During operation, the Project would generate a minimal increase in GHG emissions as routine maintenance would be provided as necessary. Therefore, implementation of the Project would have potentially significant impacts on GHG emissions and further analysis of this issue is warranted in an EIR.

## References

N/A

## Hazards and Hazardous Materials

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>IX. HAZARDS AND HAZARDOUS MATERIALS —</b> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors. As mentioned above, the Project proposes future broadband installations in various communities throughout the County, with minimal, if any, structural development required for each project. However, the specific locations of the installations are currently not known beyond those of the four near-term Priority Area projects.

The Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, and transmission fluid), and/or import/export of soils. However, these activities would be short-term, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act (RCRA),

Hazardous Materials Transportation Act (HMTA), California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts, and permits and associated conditions issued by Santa Barbara County and the City of Guadalupe. Therefore, the Project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials/waste, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. The Project is not anticipated to create a potential public health hazard, cause exposure to oil or gas pipelines or oil well facilities or contaminate public water supply.

Operation of the Project would involve the routine maintenance of vegetation removal, as needed. As such, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials. In addition, all hazardous materials used on the Project during operation would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements. Compliance with applicable regulations would ensure that operational impacts are less than significant.

Therefore, implementation of the Project would result in less than significant impacts through the routine transport, use, or disposal of due to the Project nature. No further analysis is warranted in the EIR.

- b) **Less Than Significant Impact.** At the time this Initial Study was prepared a Phase I Environmental Site Assessment was not conducted. However, a review of the California Environmental Protection Agency (CalEPA) Department of Toxic Substances Control (DTSC)'s Envirostor Database indicates that none of the nine identified Priority Areas are located in proximity to known hazardous materials sites with the potential to result in adverse effects associated with hazardous materials releases (DTSC 2024). During excavation and broadband installation, hazardous materials such as fuel and oils associated with construction equipment could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of construction workers and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during broadband infrastructure installation be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. Based on the above, compliance with existing regulations would ensure the Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation of the Project would involve the routine maintenance of vegetation removal and potentially utility pole maintenance, as needed. As stated previously, activities involving the handling and disposal of hazardous waste would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. With

applicable regulations and requirements compliance, operational activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, implementation of the Project would result in less than significant impacts related to the release of hazardous materials into the environment. No further analysis is warranted in the EIR.

- c) **Less Than Significant Impact.** Some populations (e.g., children, elderly, sick or disabled persons) are more susceptible to health effects of hazardous materials than the general population. Hazardous materials used near schools, day care centers, senior living communities, hospitals, etc., must consider potential health effects to these populations, often referred to as “sensitive receptors.” Construction or redevelopment on contaminated properties that could potentially generate vapors or fugitive dust containing contaminants may potentially pose a health risk to these populations. In addition, commercial businesses in proximity to sensitive receptors may have hazardous emissions or handle hazardous or acutely hazardous materials or wastes that could pose a health risk to these sensitive receptors.

There are numerous schools located within a 0.25-mile radius of the four identified near-term Priority Areas. In Los Alamos, the nearest existing school within the Priority Area is Olga Reed Elementary, located at 480 Centennial Street (Orcutt Union School District, 2024). In Casmalia, the nearest existing school within the Priority Area is Pine Grove Elementary, located at 1050 E Rive Ranch Road (OUSD, 2024). In the City of Guadalupe, the nearest existing schools within the Priority Area are the Mary Buren Elementary School, located at 1050 Peralta Street, and Kermit McKenzie Intermediate School, located at 4710 W. Main Street (GUSD, 2024). Additionally, in New Cuyama/Cuyama, the nearest existing schools within the Priority Area are Cuyama Valley High School, located at 7670 Cuyama Hwy; Cuyama Elementary School, located at 2300 CA-166; and Cuyama Headstart Preschool, located at CA-166.

The on-site use of hazardous materials at the Project installation sites would be limited to typical construction fuels and materials. The materials used by construction crews would be in small quantities and stored in compliance with state and federal requirements. Therefore, implementation of the Project would result in less than significant impacts as no substantial amounts of hazardous materials would be used or stored onsite. No further analysis of this issue is warranted in the EIR.

- d) **Less Than Significant Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies, such as DTSC the State Water Board, and CalEPA. As noted above, DTSC maintains the EnviroStor database (DTSC 2024), which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites (National Priorities List); State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control



Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup (USTs, Department of Defense, Site Cleanup Program) as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders or Cleanup and Abatement Orders from the State water board.

The Project proposes future broadband installations in various communities throughout the County. However, aside from the four near-term Priority Area projects, the specific locations of the installations are currently not known, although all broadband installations under the Project are anticipated to generally occur predominantly along public and private roadways. At the time of this Initial Study, a Phase I Environmental Site Assessment was not conducted; however, as noted above, a review of the DTSC Envirostor Database indicated that no significant hazardous materials sites are located in the vicinity of any of the nine identified Priority Areas. Construction methods would primarily include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavation for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet ) and would be temporary in nature over a period of several months depending on the number of properties being served. Thus, based on the anticipated nature and extent of Project construction activities, it is unlikely that the Project would be located on a site which is included on a list of hazardous material sites that could create a significant hazard to the public or the environment from the release of hazardous materials. Therefore, implementation of the Project would result in less than significant impacts. No further analysis of this issue is warranted in the EIR.

- e) **No Impact.** The Project proposes future broadband infrastructure installations in various communities throughout the County. The Priority Areas identified are not within the vicinity of a private airstrip, heliport, or helistop or within an airport land use plan or within two miles of a public or private airport (County of Santa Barbara 2024). Furthermore, the proposed broadband improvements would not place additional habitable structures or population in proximity to any airports, airstrips, or aircraft operations such that adverse effects could occur. Therefore, implementation of the Project would result in no impacts to airport-related safety hazards or excessive noise for people residing or working in the Project area. No further analysis of this issue is warranted in the EIR.
- f) **Less Than Significant Impact.** The Project proposes future broadband installations in various communities throughout the County. However, while nine Priority Areas have been identified for broadband installations in the near future, the specific locations of additional future installations are currently not known. Irrespective of the timing and location of these future projects, construction activities would typically take place outside of, but parallel and adjacent to, existing public and private roadways. While temporary construction activities within or adjacent to public ROW could result in short-term decreases in traffic flow, such effects would be necessarily localized and would be at least partially addressed by adherence to standard construction practices for traffic control and safety (e.g., Greenbook: Standard Specifications for Public Works Construction or similar guidance). As such, construction activities associated with future broadband installations would not be expected to result in temporary blockage or closure of local



access routes within the Priority Areas such that adverse impacts to an adopted emergency response plan or emergency evacuation plan would result. In fact, given the relatively rural nature of many of the Priority Areas and other future areas that are unserved or underserved by broadband service in the County, the potential for significant traffic congestion to result from Project-related construction activities that could in turn affect implementation of an adopted emergency response plan or emergency evacuation plan is considered low. Therefore, implementation of the Project would result in less than significant impacts with an adopted emergency response plan or emergency evacuation plan. No further analysis is warranted in the EIR.

- g) **Less Than Significant Impact.** The majority of the identified Priority Areas are located in urbanized settings but within a relatively rural context with sparse development density and extensive open space areas in the surrounding vicinity. According to CAL FIRE, several of the nine Priority Areas are located within a designated Fire Hazard Severity Zone (FHSZ). Portions of the nine Priority Areas are located in moderate, high, and very high FHSZs within State Responsibility Areas (SRAs) served by CAL FIRE, as well as within Local Responsibility Areas (LRAs) served by County or local fire departments, and within Federal Responsibility Areas (FRAs) such as Vandenburg Space Force Base and the Los Padres National Forest (CalFire 2024). As such, elevated fire risks are present throughout the Project Area where future broadband installations would occur.

The Project proposes future broadband infrastructure installations in various communities within the County and does not propose any other associated development. The Project broadband infrastructure would consist of new fiber-optic lines installed underground following public or private roadways and would not involve installation of high-voltage power lines or other facilities that could result in ignition of urban structure fires or wildfires. The Project would also include construction activities within those areas where lateral lines are installed between public or private roadways and individual businesses or residences. The broadband installations would avoid sensitive habitats, including areas of thick vegetation or trees (i.e., potential wildfire fuel sources) wherever feasible. Construction and operation activities would require regular vegetation removal and maintenance, minimizing wildland fire risks. Additionally, the Project would be required to comply with all applicable fire codes and other safety requirements in the design, construction, and operation of proposed facilities. Thus, as no permanent population or habitable structures are proposed, the Project would have less than significant impacts regarding the significant risk of loss, injury, or death involving wildland fires. No further analysis is warranted in the EIR.

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## Hydrology and Water Quality

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>X. HYDROLOGY AND WATER QUALITY —</b> Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** The Project proposes future broadband infrastructure installation in various communities throughout the County. Construction activities would include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet) and would be temporary in nature, with the ground surface and any paving or landscaping restored to pre-project conditions once construction is complete. During excavation, exposed and stockpiled soils could be subject to wind and water conveyance into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading, as a result of runoff from the site. The County would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit, including the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) to minimize soil erosion/sedimentation and other runoff from the Project areas from entering the storm drains during the construction period. Compliance with all applicable federal, State, and local requirements would reduce the potential for Project construction to result in the release of contaminants into the storm drain system or groundwater, which would preclude the

Project from causing a violation of any adopted water quality standards or waste discharge or treatment requirements during construction activities. Therefore, the Project would not violate water quality standards and discharge requirements or otherwise substantially degrade water quality. Operational impacts would be less than significant as there is no planned development, and operation would only require periodic maintenance. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality and impacts regarding water quality and discharge requirements would be less than significant. No further analysis of this issue is warranted in the EIR.

- b) **Less Than Significant Impact.** The County has nine groundwater basins that are utilized to provide a portion of the domestic water supply for its residents, with the main groundwater units underlying the nine Priority Areas being the San Antonio Creek Valley Basin, Santa Ynez River Valley Basin, Santa Maria River Valley Basin, and Cuyama Valley Basin (SBCWA 2019). Construction activities would include open-trench construction and horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet) and would be temporary in nature. The Project would not result in the introduction of notable impervious surface area to the future project sites given the limited footprint of proposed broadband facilities to be installed and associated construction footprint and lack of substantial paving or structural improvements. Therefore, implementation of future broadband installations is not expected to measurably reduce groundwater recharge associated with introduction of impervious surfaces.

If groundwater is encountered during Project excavation, temporary dewatering would be required, and the construction contractor would be expected to manage the groundwater/dewatering process, including any disposal of wastewater in accordance with the NPDES Construction General Permit, Caltrans Stormwater Permit, and other requirements, as applicable. Any dewatering would be temporary and cease when excavation is complete. Thus, dewatering during excavation would not affect groundwater recharge as there would be a minimal net deficit in groundwater volume or lowering of the local groundwater table level based on the nature of the Project. Thus, excavation impacts would be less than significant. Therefore, implementation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge due to the nature of the Project improvements and facilities to be constructed. No further analysis of this issue is warranted in the EIR.

- c. i) **Less Than Significant Impact.** See Response VII.b), above. The Project does not propose any alteration to a stream or river course. Soil disturbance would temporarily occur during excavation activities. Disturbed soils may be susceptible to erosion from wind and rain, however, compliance with the NPDES Construction General Permit, which requires the preparation and implementation of a project-specific SWPPP, which would prescribe BMPs to prevent sediment and other pollutants from leaving the site and entering waterways. As noted previously, the Project proposes future broadband installations consisting of underground cable and conduit construction and mounting of cables from utility poles in various communities throughout the County, with only very limited above-ground improvements and small modular equipment structures proposed. The Project would not substantially alter the existing drainage pattern of the

site or area given compliance with NPDES Construction General Permit and MS4 Permit requirements, as well as any applicable Low Impact Development (LID) requirements. Although the specific locations for all future broadband installations are not known at this time, it is unlikely that the Project would have the potential to generate substantial amounts of sediment and stormwater runoff based on the limited construction footprints associated with broadband facilities and assuming compliance with applicable stormwater regulations and associated requirements discussed above. Therefore, implementation of the Project would not alter the course of a stream or river, in a manner which would result in on- or off- site flooding or would exceed the capacity of existing or planned stormwater drainage systems, and impacts would be less than significant. No further analysis of this issue is warranted in the EIR.

- c. ii) **Less Than Significant Impact.** See Response X.b), above. The Project proposes future broadband infrastructure installation in various communities throughout the County. Construction activities would include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet) and would be temporary in nature. The Project would not notably alter the existing topography or drainage patterns on- or off-site due to the nature of proposed construction activities associated with the Project, which would result in relatively low amounts of disturbed surface area and would be restored to pre-project conditions upon completion of construction activities. Additionally, according to the Santa Barbara County Safety Element Map, the portions of the identified Priority Areas are located within a Flood Hazard Area (FA) Overlay Zone (Santa Barbara County 2024a). The FA Overlay Zone includes areas within a 100-year flood plain (Santa Barbara County 2024b). Additionally, Guadalupe is within a Dam Inundation Zone (Santa Barbara County, 2024a). Implementation of future broadband installations within the Project Area would not introduce substantial amounts of impervious surfaces or directly or indirectly alter the course of a stream or river such that the Project would result in substantial flooding on- or off-site. The Project areas would remain predominantly pervious, allowing water to percolate into underlying soils in the event of a flood. Therefore, implementation of the Project would not result in an increase of surface runoff in a manner which would result in flooding on- or off-site, and impacts would be less than significant. No further analysis of this issue is warranted in the EIR.
- c. iii) **Less Than Significant Impact.** As mentioned in Responses X.a.i) and X.a.ii), above, the Project would not meaningfully alter the drainage pattern of the affected Project areas. The Project proposes future broadband infrastructure installation in various communities throughout the County. Construction activities would include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet) and would be temporary in nature. In terms of polluted runoff, future broadband infrastructure installations would not generate substantial amounts of pollutants that could potentially be carried in stormwater runoff and enter the receiving water. Furthermore, compliance with the NPDES Construction General Permit, which requires the preparation and implementation of a SWPPP and BMPs to minimize soil erosion/sedimentation and other runoff, would minimize the likelihood of polluted runoff entering the watercourse. Additionally,

compliance with applicable LID requirements that limit the amount and rate of stormwater discharges from a project site, as well as the limited amount of impervious surface area involved in the proposed broadband installations, would preclude the potential for substantial increases in stormwater flow rates or volumes generated by future broadband projects that could exceed the capacity of stormwater drainage facilities serving the various future project sites. Therefore, implementation of the Project would not create or contribute additional runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff, and impacts would be less than significant. No further analysis of this issue is warranted in the EIR.

- c. iv) **Less Than Significant Impact.** The Project would not notably alter existing drainage patterns in the Project Area, as discussed in Responses X.c.i) through X.c.iii), above. Although portions of the Project Area are located within designated flood hazard areas including dam inundation areas, the Project proposes future broadband infrastructure installations in various communities throughout the County, the vast majority of which would be located underground and would have minimal increases in impervious surfaces that could contribute to flooding hazards or the potential to impede or redirect flood flows. Therefore, implementation of the Project would not have the potential to impede or redirect flood flows and impacts would be less than significant. No further analysis of this issue is warranted in the EIR.
- d) **Less Than Significant Impact.** According to the Santa Barbara County Safety Element Map, portions of the identified Priority Areas are located within a Flood Hazard Area (FA) Overlay Zone, and all Priority Areas except the southernmost portion of the Refugio Canyon Priority Area are located outside of a Tsunami Hazard Area (Santa Barbara County 2024a). No portions of identified Priority Areas are located immediately adjacent to or downstream of a large, enclosed body of water that could be subject to seiche effects in the event of a strong seismic event. As mentioned previously, the Project proposes future broadband infrastructure installations and does not propose any other associated development or habitable structures and therefore, would not have a significant impact on people or structures during the event of a tsunami. Therefore, implementation of the Project would not expose people or structures to a significant risk of loss, injury, or death involving flood hazard, tsunami, or seiches, and impacts would be less than significant. No further analysis of this issue is warranted in the EIR.
- e) **Less Than Significant Impact.** As discussed in the various responses above, the Project proposes future broadband infrastructure installation in various communities throughout the County. Construction activities would include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavations for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet) and would be temporary in nature. Construction and operation of future broadband facilities would be carried out in accordance with applicable requirements including NPDES and LID requirements, which would include installation of applicable stormwater BMPs to maintain water quality in stormwater discharges throughout construction and operation of the Project, which would preclude the potential for the Project to conflict with the Water Quality Control Plan for the Central Coast Basin (Basin Plan). As also discussed above, the Project would have little potential to interfere with groundwater recharge or result in substantial groundwater

use such that conflicts with a sustainable groundwater management plan could result from Project implementation. The Project, therefore, does not have the potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant. No further analysis is warranted in the EIR.

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## Land Use and Planning

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XI. LAND USE AND PLANNING —</b> Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** The Project areas are generally located in underserved and unserved communities throughout the County. The identified Priority Areas have several land use designations, for which the land use pattern is predominantly single-family residential (County of Santa Barbara 2024a). As mentioned above, the Project consists of future broadband infrastructure installations in nine identified Priority Areas, as well as future additional projects throughout the County. These Priority Areas are established communities adjacent to main roads, which contain the middle-mile broadband facilities to which the proposed facilities would connect. The future broadband installations would be installed within existing County maintained road right-of-way, public utility easements, and/or overhead public utility easements throughout the County. The Project does not propose development that could physically divide an established community. Rather, the Project is intended to provide additional connectivity to existing County residents and would not include construction of sizeable above-ground structures that would cause land use divisions. Therefore, implementation of the Project would not physically divide an established community and impacts would be less than significant. No further analysis is warranted in the EIR.
- b) **Less Than Significant Impact.** The Project has several general plan land use and zoning designations within the nine identified Priority Areas and throughout other parts of the County. Public roads are currently designated in City and County general plans, zoning codes, and ordinances to accommodate utility infrastructure. The future broadband installations would be used to connect existing communities that are currently unserved or underserved in the County. The installation of broadband infrastructure would not require changes to land use or zoning designations or conflict with other requirements such as development standards and design guidelines of affected local jurisdictions. Prior to issuance of use permits, grading, and/or encroachment permits by Santa Barbara County or other local jurisdiction, as applicable, the Project would be required to demonstrate compliance with all applicable laws, regulations, policies, and ordinances. The following provides a discussion of the Project's consistency with various applicable planning documents.

### *City of Guadalupe 2042 General Plan*

The City of Guadalupe 2042 General Plan, adopted on November 22, 2022, provides a blueprint for the use and development of land within the City through 2042. The Project would be

consistent with the Guadalupe General Plan, Economic Development Element **Goal ED-5** to develop a sustainable broadband middle mile infrastructure model with the community to support resilience, emergency services homeland security, economic growth, and business development. As previously discussed, the Project consists of future broadband infrastructure installations in communities classified as unserved and underserved; thus, the Project would support this goal (City of Guadalupe 2022). Additionally, according to the City of Guadalupe Figure 2-2, Land Use Diagram, the City's westside neighborhood is located within the Coastal Zone Boundary; however, as the Project does not propose development that could have a significant impact to people and structures, no conflict would occur (City of Guadalupe 2021).

#### *Los Alamos Community Plan and Design Guidelines*

The Los Alamos Community Plan, Public Facilities and Services Chapter, guides development in planning, road maintenance and design, building and development review, fire and police, and parks and recreation (County of Santa Barbara, 2011a). The Project would be consistent with **Goal SERV-LA-2** to provide universal residential and business access to broadband internet services for education, economic development, and healthcare. The Project would also be consistent with **Policy SERV-LA-2.1** for improving and expanding community-wide access to high-speed internet and telecommunication infrastructure (e.g. wireless, fiber-optic, cable) (County of Santa Barbara 2011a). Additionally, Los Alamos has a Design Control (D) Zoning Overlay, intended to ensure well designed development and to protect scenic qualities, property values, and neighborhood character along Bell Street (County of Santa Barbara 2024b). The Project would be consistent with the Los Alamos Bell Street Design Guidelines since most, if not all, of the infrastructure would be underground and would not be visible to the public. If there are any above-ground structures, the Street Design Guidelines would be followed through inclusion of screening from general public view with non-reflective material and screened to the greatest extent feasible (County of Santa Barbara 2011b).

#### *Santa Barbara County Environmental Resource Management Element (ERME)*

The Santa Barbara County ERME summarizes various environmental factors analyzed in the Seismic Safety, Conservation, and Open Space Elements, and relates these factors to proposals on County open space preservation (County of Santa Barbara 2009). According to the Santa Barbara County Land Use and Zoning Map, portions of the Los Alamos, Jonata Park, Los Olivos, Refugio Canyon, Highway 246 Corridor, East of Santa Maria, and New Cuyama and Cuyama Priority Areas are located within the ERME Scenic Corridor (County of Santa Barbara, 2024a). These scenic corridors are classified as having the highest scenic values and urbanization could be permitted only in appropriate instances, subject to project plan review and imposition of specific conditions to protect against hazards and preserve the integrity of the land and environment (County of Santa Barbara, 2009). As previously discussed, the Project consists of future broadband infrastructure installations which is mostly planned as underground infrastructure, and no additional development is planned as this time. Nonetheless, the Project would comply with all project plan review and specific conditions for each appropriate jurisdiction to ensure consistency.

In addition, the Project would not include development that is incompatible with existing land uses, induce substantial population growth or concentration, cause the loss of open space, or create an economic or social effect that would result in a physical change. The Project would comply with all existing land use plans and regulations and would not have any significant impact on the environment due to any conflicts with such plans and regulations. No further analysis is warranted in the EIR.

## References

City of Guadalupe, 2021. Figure 2-2, Land Use Diagram. Available at: <https://cityofguadalupe.org/wp-content/uploads/2023/10/Final-Fig-2-2-Land-Use-Diagram-1-17-23.pdf>. Accessed April 2024.

City of Guadalupe, 2022. City of Guadalupe 2042 General Plan. Adopted November 22, 2022. Available at: <https://cityofguadalupe.org/wp-content/uploads/2023/05/City-of-Guadalupe-2042-General-Plan-Final-English.pdf>. Accessed April 2024.

County of Santa Barbara, 2009. Environmental Resource Management Element (ERME). Available at: <https://www.countyofsb.org/966/Environmental-Resource-Management>. Accessed April 2024.

County of Santa Barbara, 2011a. Los Alamos Community Plan. Available at: <https://www.countyofsb.org/929/Los-Alamos-Community-Plan>. Accessed April 2024.

County of Santa Barbara, 2011b. Los Alamos Bell Street Design Guidelines. Available at: <https://content.civicplus.com/api/assets/6272f0ab-5da7-47a8-a539-f820498b6fbc>. Accessed April 2024.

County of Santa Barbara, 2024a. Santa Barbara County Land Use and Zoning Map. Available at: <https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=0f24610ca52d4e28b12e2d76bf61d5ec>. Accessed April 2024.

County of Santa Barbara, 2024b. Land Use Code. Chapter 21- Land Division. Design Control Zoning Overlay. Available at: <https://www.countyofsb.org/1043/Land-Use-Code>. Accessed April 2024.

## Mineral Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XII. MINERAL RESOURCES —</b> Would the project:				
a) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No Impact.** The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. According to the Department of Conservation (DOC), Mineral Land Classification Map, the identified Priority Areas are not located within a Mineral Resource Zone where geologic data indicates the presence of significant mineral resources (DOC, 2023). The Priority Areas are located within or adjacent to several identified Oil & Gas Fields (DOC 2023b). The identified Priority Areas have several land use designations, although the land use pattern in these communities is predominantly single-family residential (County of Santa Barbara 2024). The identified Priority Areas are not utilized for mineral extraction activities, nor are they planned for mineral extraction activities, and would not result in the loss of availability of known mineral resources. In addition, since future broadband installation projects are anticipated to occur along existing public and private roadways or within utility easements or other linear alignments, these areas are not anticipated to be classified as mineral resource zones and Project-related improvements would not affect the availability of a known mineral resource. Therefore, implementation of the Project would result in no impact regarding the loss of availability of mineral resources, and no further analysis is warranted in the EIR.
- b) **No Impact.** The Project would not 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. The Priority Areas that have been identified are located in locally urbanized settings, but within relatively rural areas of the County that are currently underserved or unserved by high-speed broadband internet services. According to the DOC Mineral Land Classification Map, the identified Priority Areas are not located within a Mineral Resource Zone where geologic data indicates the presence of significant mineral resources (DOC 2023). Additionally, according to the DOC Geologic Energy Management Division Well Finder Map, numerous oil and gas wells and associated well fields are located within the County, but none of the Priority Areas or other potential future broadband project sites are zoned for mineral resource recovery (County of Santa Barbara 2024). In addition, as noted above, future projects are anticipated to occur along existing public and private roadways or within utility easements or other linear alignments and would not be expected to interfere with locally important mineral resource recovery sites. Therefore, implementation of the Project would not result in loss of known mineral resources of local importance, and no further analysis is warranted in the EIR.

## References

County of Santa Barbara, 2024. Santa Barbara County Land Use and Zoning Map. Available at: <https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=0f24610ca52d4e28b12e2d76bf61d5ec>. Accessed April 2024.

Department of Conservation (DOC). 2023a. California Geologic Survey Information Warehouse, Mineral Land Classification. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed April 2024.

Department of Conservation (DOC), 2023b. Well Finder. Available at: <https://maps.conservation.ca.gov/doggr/wellfinder/>. Accessed April 2024.

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## Noise

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIII. NOISE</b> — Would the project result in:				
a) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** As previously discussed, the Project proposes future broadband infrastructure installations in various communities throughout the County and surrounding uses could be identified as sensitive receptors. During construction, the Project would require the use of heavy construction equipment that would generate noise on a short-term basis. During operation, the Project would involve routine maintenance of infrastructure which would generate minimal long-term impacts. Therefore, implementation of the Project could generate a temporary increase in ambient noise levels in excess of applicable standards for nearby sensitive receptors in various communities throughout the County, and further analysis of this issue is warranted in the EIR.
- b) **Potentially Significant Impact.** The Project would include construction of future broadband infrastructure installations in various communities throughout the County which could generate temporary groundborne noise and vibration during the installation of utility poles, where applicable. As mentioned in the Project Description, the Project installations would predominantly involve installing underground conduit and fiber optic cable. Construction methods would primarily include horizontal point-to-point underground boring, and if necessary, could include micro-trenching and/or aerial stringing from utility poles. Excavation for boring pits would generally be limited to two feet by two feet (but up to a maximum of two feet by six feet) and would be temporary in nature over a period of several months. Additionally, construction equipment would also generate noise and vibration due to the use of heavy equipment. Therefore, implementation of the Project could generate excessive groundborne noise and vibration, and further analysis of this issue is warranted in the EIR.
- c) **No Impact.** The Project proposes future broadband infrastructure installations in various communities throughout the County. The Priority Areas identified are not within an Airport Land Use Plan (County of Santa Barbara 2024). Construction and operation of the Project would not place people or habitable structures in proximity to an airport or private airstrip, and thus would not have the potential to expose people to excessive airport- or aircraft-related noise levels.



Therefore, implementation of the Project would result in no impact and no further analysis of this issue is warranted in the EIR.

## References

County of Santa Barbara, 2024. Santa Barbara County Land Use and Zoning Map. Available at: <https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=0f24610ca52d4e28b12e2d76bf61d5ec>. Accessed April 2024.

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## Population and Housing

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIV. POPULATION AND HOUSING</b> — Would the project:				
a) 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** The Project consists of future broadband infrastructure installations within various communities in the County. The Project does not propose any residential uses that would introduce a new permanent population to the Project areas as construction workers would likely come from the wider area and not need to relocate for the purpose of working on the Project. During construction activities, for the four near-term Priority Areas, approximately three to five construction workers per day per Priority Area project would be present at the respective work areas over the course of approximately 24 months. It is anticipated that this nominal amount of construction workers would be typical for similar broadband installation projects within the County and that the workers employed on such projects would come from the local labor force and therefore would not introduce a permanent population to the Project areas. Therefore, implementation of the Project would not induce unplanned direct or indirect population growth in the area and impacts in this regard would be less than significant. No further analysis of this issue is warranted in the EIR.
- b) **Less Than Significant Impact.** The Project consists of installation of broadband infrastructure throughout the County, including within the nine Priority Areas, which have historically been under-resourced and lack consistent, reliable internet access. The Project would not involve demolition or removal of any existing housing or otherwise result in the displacement of people within the nine Priority Areas or the County at large, as the proposed improvements would be limited primarily to existing street ROW, utility easements, or other public property with a limited construction footprint. The relatively small scale of broadband installation activities would generally preclude the necessity to remove any existing structures, including housing. Therefore, implementation of the Project would not necessitate the construction of replacement housing elsewhere. No further analysis of this issue is warranted in the EIR.

## References

N/A

## Public Services

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XV. PUBLIC SERVICES —</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a.i) **No Impact.** Various public agencies, including CAL FIRE, Santa Barbara County Fire Department (SBCFD), US Space Force, U.S. Forest Service, and local fire departments provide fire protection services within the County. The four identified near-term Priority Areas are served by the SBCFD, the City of Guadalupe Fire Department, and U.S. Forest Service, respectively (County of Santa Barbara, 2024). Specifically, Los Alamos is served by SBCFD Station No. 24, located at 99 Centennial Street; Casmalia is served by SBCFD Station No. 21, located at 335 Union Ave., Orcutt, California; Guadalupe is served by the City of Guadalupe Fire Station No. 2, located at 918 Obispo Street, Guadalupe California; and New Cuyama and Cuyama are served by the U.S. Forest Service Station, located at 30 Newsome Street, New Cuyama, and SBCFD Station No. 41, located at 41 Newsome Street, New Cuyama (County of Santa Barbara, 2024). As previously discussed, the Project consists of future broadband infrastructure installation in various communities throughout the County. Construction activities would primarily occur adjacent to existing public and private roadways, and no street closures are anticipated that would potentially impact service ratios, response times, or other fire department or U.S. Forest Service performance objectives. Given the potential presence of flammable materials on site, albeit in limited quantities, the Project would comply with applicable state, federal, and local laws and regulations to reduce potential risks from flammable materials. Additionally, as discussed above, the Project would not induce population growth in the affected areas and would not result in a substantial increase in the demand for fire protection services since the infrastructure would primarily be located underground and would operate passively once constructed. Therefore, implementation of the Project would not exacerbate the potential for fire hazards and would not increase demand for fire services. No further analysis is warranted in the EIR.
- a.ii) **No Impact.** A number of law enforcement agencies provide police protection services within the County, including the Santa Barbara County Sheriff's Office (SBCSO) and other local police departments. The four near-term Priority Areas are served by the SBCSO and City of Guadalupe

Police Department (GPD), respectively. Specifically, Los Alamos and Casmalia are served by the SBCSO Station located at 812 W Forest Rd, Santa Maria; Guadalupe is served by the GPD, located at 4490 10th Street; and New Cuyama and Cuyama are served by the SBCSO station located at 70 Newsome Street, Cuyama. As previously discussed, the Project would not directly or indirectly induce population growth and, therefore, would not result in a substantial increase in the demand for police protection services. Construction activities would occur adjacent to public and private roadways, and no street closures are anticipated that may potentially affect service ratios, response times, or other police department performance objectives. Therefore, implementation of the Project would not require new or expanded police facilities that would cause significant environmental impacts. No further analysis is warranted in the EIR.

- a.iii) **No Impact.** A number of school districts serve the Project Area (Santa Barbara County Education Office, 2024). Specifically, for the four near-term Priority Areas, Los Alamos and Casmalia are served by Orcutt Union School District; Guadalupe is served by Guadalupe Union School District; and New Cuyama and Cuyama are served by Cuyama Joint Unified School District (Santa Barbara County Education Office, 2024). The Project does not propose any residential development that would introduce new permanent student residents to the Priority Areas or other areas within the County. There is no additional planned development that would occur in conjunction with the Project. As discussed above, the Project does not propose development that would introduce new families with school-aged children into the various school districts serving County residents, which could necessitate construction or expansion of school facilities. As such, implementation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. In fact, the broadband installation, in some cases, is intended to provide greater internet access to schools in rural communities, which would be a beneficial impact to schools by facilitating expanded remote learning opportunities in affected communities. Therefore, implementation of the Project would not require new or expanded school facilities that would cause significant environmental impacts. No further analysis is warranted in the EIR.
- a.iv) **No Impact.** The Project would not induce population growth in the area that could cause an increase in the use of existing parks or recreational facilities. The Project would not introduce residential uses and would not generate a new residential population that would regularly utilize nearby parks and recreational facilities. As previously discussed, during construction activities, between three and five construction workers per day would be expected to be present over a period of several months for each future project. While some of the construction workers may utilize local parks and recreational facilities during the workday, such use would be anticipated to be limited and would not trigger the need for new or expanded facilities. Therefore, implementation of the Project would not require the construction of new or expanded park facilities. No further analysis is warranted in the EIR.
- a.v) **No Impact.** The Project would not introduce residential uses and would not generate a new residential population that would require other public facilities, such as libraries or healthcare facilities. Therefore, implementation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities. No further analysis is warranted in the EIR.

## References

County of Santa Barbara, 2024. Santa Barbara County Safety Element Map. Available at: <https://www.countyofsb.org/974/Seismic-Safety-Safety>. Accessed April 2024.

Santa Barbara County School Districts, 2024. MapIt. Districts and Schools Overview. Available at: <https://www.sbceo.org/districts/overview>. Accessed April 2024.

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## Recreation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVI. RECREATION —</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Discussion

- a) **No Impact.** As noted in discussions above, the Project could result in broadband installation projects occurring throughout the County over the course of many years. The identified Priority Areas are served by various recreational facilities provided by the Santa Barbara County and local jurisdictions. Specifically, with regard to the four near-term Priority Areas, the nearest recreational facility to Los Alamos is Los Alamos Park, located at 500 Drum Canyon Rd, and provides picnic areas, play structures, turf play area, hiking trail, volleyball and horseshoes (County of Santa Barbara 2024a). The nearest recreational facilities to Casmalia are the Shack Paintball Field, located at 4040 Highway 101, Santa Maria and Rancho Maria Golf Course, located at 1950 Cabrillo Hwy, Santa Maria (County of Santa Barbara 2024a). Recreational facilities in the City of Guadalupe include the renovated Leroy Park Community Center, located at 11th Street; Central Park; Tognazzini Avenue Park; and Jack O’Connel Park (County of Santa Barbara 2024a; City of Guadalupe 2022). The nearest recreational facilities to New Cuyama and Cuyama are Richarson Park, located at Wasioja Street, providing picnic sites, horseshoes/volleyball, tot lot play structure, turf play area, and hiking trail; and the Joseph Centeno Cuyama Aquatics Complex, located at 290 Wasioja Street, providing a four-lane by the 25-yard pool along with an 18-inch deep wading pool and spray structure (County of Santa Barbara 2024a, 2024b).

As previously discussed, the Project consists of future broadband infrastructure installations in various communities throughout the County. The Project would not induce population growth in the areas, and therefore, would not cause an increase in the use of existing parks or recreational facilities. During construction activities, it is anticipated that between three and five construction workers per day would be present for a period of several months for each project being constructed, or a total of approximately 24 months for completion of the four near-term Priority Area projects. While some of the construction workers may utilize local parks and recreational facilities during the workday, such use would be anticipated to be limited. Since the Project is located along roadways, there is the possibility that some bike lanes may be impacted during broadband cable installation; however, this would be temporary and alternative routes would be determined and communicated to the public. Therefore, implementation of the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities. No further analysis is warranted in the EIR.



- b) **No Impact.** The Project would not include construction of recreational facilities. Furthermore, the Project is not expected to induce substantial population growth that would result in increased demand for or increased use of existing recreational facilities. No increase in permanent residents would occur. Therefore, implementation of the Project would not necessitate the expansion of recreational facilities. No impacts would occur and no further analysis is warranted in the EIR.

## References

City of Guadalupe, 2022. City of Guadalupe 2042 General Plan, Figure 5-8 Public Facilities and Parks. Adopted November 22, 2022. Available at: <https://cityofguadalupe.org/wp-content/uploads/2023/05/City-of-Guadalupe-2042-General-Plan-Final-English.pdf>. Accessed April 2024.

County of Santa Barbara, 2024a. Parks Map. Available at: <https://www.countyofsb.org/1204/Parks-Map>. Accessed April 2024.

County of Santa Barbara, 2024b. Joseph Centeno Aquatics Center. Available at: <https://www.countyofsb.org/950/Joseph-Centeno-Aquatics-Center>. Accessed April 2024.

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## Transportation

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVII. TRANSPORTATION —</b> Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** SBCAG’s 2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (SBCAG, 2013) and the County’s Comprehensive Plan, zoning ordinances, capital improvement programs, and other planning documents contain transportation and circulation programs, plans, ordinances, and policies. Threshold question “a” considers a project in relation to those programs, plans, ordinances, and policies that specifically address multimodal transportation, complete streets, transportation demand management (TDM), and other vehicle-miles-traveled (VMT)-related topics.

The County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion (i.e., “Level of Service” [LOS]) an environmental impact. Therefore, threshold question “a” does not apply to provisions that address LOS or similar measures of vehicular capacity or traffic congestion. A transportation impact occurs if a project conflicts with the overall purpose of an applicable transportation and circulation program, plan, ordinance, or policy, including impacts to existing transit systems and bicycle and pedestrian networks pursuant to Public Resources Code Section 21099(b)(1). In such cases, applicants must identify project modifications or mitigation measures that eliminate or reduce inconsistencies with applicable programs, plans, ordinances, and policies.

Since the Project includes the installation of broadband infrastructure, no new land uses that could generate notable amounts of vehicle travel are included in the Broadband Program. Additionally, while construction activities under the Project could result in temporary lane closures or detours while construction work within or along public or private streets or trails is occurring, such effects would only occur for a short duration and overall implementation of proposed future broadband installations would not have a measurable effect on the circulation system including transit, roadway, bicycle and pedestrian facilities. Therefore, the Project would not create a demand for or result in adverse effects to transportation facilities, and thus would not conflict with local or regional transportation planning efforts or transportation services and facilities. Impacts would be less than significant, and no further analysis is warranted in the EIR.

- b) **Less Than Significant Impact.** As the Project is limited to the installation of broadband infrastructure, the Project would not generate any new long-term VMT or vehicle trips. Up to 40 (20 incoming and 20 outgoing) construction-related vehicle trips may occur on a peak day, which is less than the 110 daily trip screening threshold recommended by the Governor's Office of Planning and Research (OPR 2024). Therefore, the Project is consistent with Section 15064.3 of the State CEQA Guidelines. No further analysis is warranted in the EIR.
- c) **Less Than Significant Impact.** While temporary construction activities could result in temporary lane closures or detours while construction within or adjacent to the street ROW is underway, standard construction traffic measures would be employed to minimize the potential for safety hazards to vehicles, cyclists, and pedestrians, as applicable, in order to preclude the potential for temporary construction-related safety hazards. Furthermore, the Project would not involve any changes to the design or operation of any roadways or include the development of any incompatible uses; therefore, increases in traffic hazards from long-term operation of the Project are not anticipated. A less than significant impact is anticipated, and no further analysis is warranted in the EIR.
- d) **Less Than Significant Impact.** As noted above, the Project locations are anticipated to occur along existing public and private roadways within the County, which could temporarily result in lane closures or traffic detours in construction zones, thus potentially limiting localized emergency vehicle access. However, construction would be temporary with any one location only affected for a number of days or weeks at most, and the roadways would not be impacted once construction is complete. Therefore, the Project would not create conditions that would result in inadequate emergency access for adjacent land uses. A less than significant impact is anticipated, and no further analysis is warranted in the EIR.

## References

Governor's Office of Planning and Research (OPR). SB 743 Frequently Asked Questions. Accessed online April 22, 2024 via <https://opr.ca.gov/ceqa/sb-743/faq.html>.

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## Tribal Cultural Resources

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XVIII. TRIBAL CULTURAL RESOURCES —</b>				
a) 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 the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a.i) **Potentially Significant Impact.** Assembly Bill (AB) 52 requires that prior to release of an EIR for a project, the lead agency shall consult with Native American Tribes to identify, evaluate, and mitigate impacts to tribal cultural resources if a Tribe has formally requested consultation (OPR, 2017). At the time of this Initial Study, a record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was not completed for the Project, and thus no results are available. As such, to allow for compliance with AB 52, which mandates Native American consultation, further analysis of this issue is warranted in the EIR.
- a.ii) **Potentially Significant Impact.** As noted above, the Project may have the potential to adversely affect tribal cultural resources in proximity to the nine Priority Areas and future broadband installation project sites. As such, in compliance with AB 52, which mandates Native American consultation if requested, further analysis of this issue is warranted in the EIR.

## References

Governor's Office of Planning and Research (OPR). AB 52 And Tribal Cultural Resources In CEQA. June 2017. Accessed April 2024.

## Utilities and Service Systems

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XIX. UTILITIES AND SERVICE SYSTEMS —</b>				
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, and natural gas facilities. The Project proposes future broadband infrastructure installations in various communities throughout the County. Thus, the Project would require or result in the relocation or construction of new or expanded electric power and telecommunication facilities. As mentioned in the Project Description, the proposed installations located within the nine identified Priority Areas would require construction efforts in terms of providing additional electric power and telecommunication services.

The Priority Areas and nearby communities are currently served and would continue to be served by GenOn Energy, Pacific Gas & Electric Company, and Southern California Edison (SCE) for its electricity needs. It is anticipated that existing power facilities would be sufficient to support the Project's needs based on the systems being designed to operate using a combination of storage and transmission capabilities to meet customer demand. As such, it is also anticipated that various upgrades to offsite power facilities may be required to adequately serve the four Priority Areas and other future broadband installation sites in the County. Therefore, the Project could require or result in the relocation or construction of new or expanded power facilities, the construction or relocation of which could cause significant environmental effects. Therefore, implementation of the Project would have potentially significant impacts, and further analysis of this issue is warranted in the EIR.

Regarding telecommunications, the identified Priority Areas are located in relatively rural areas of the County that are not currently served by existing broadband telecommunication services. The Project proposes future broadband infrastructure installations in communities throughout the County and thus would require the installation of new underground telecommunication lines (for internet, telephone, and other services), as needed, to serve the Priority Areas. Construction impacts associated with the installation of new telecommunication infrastructure would likely involve trenching to place the lines below ground surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure, if needed, is expected to be limited to on-site telecommunications distribution and minor off-site work associated with connections to the broader infrastructure system. Due to the Priority Areas being undeveloped and the absence of current telecommunication services, it is anticipated that additional telecommunication facilities would be required to adequately serve the nine identified Priority Areas. Thus, the Project would require or result in the relocation or construction of new or expanded telecommunication facilities, the construction of relocation of which could cause significant environmental effects. Therefore, implementation of the Project would result in potentially significant impacts, and further analysis of this issue is warranted in the EIR.

- b) **Less Than Significant Impact.** The Project would not generate a substantial increase in demand for water as the Project does not propose development that could increase demand for water services. During construction activities, a small amount of water may be used for dust suppression and fire suppression, as needed. The Project would use existing water supplies on-site to suppress dust, negating the need for temporary water to be brought to the sites. During operation and maintenance, no water use would be required. Since the Project's projected required water supplies would represent a minimal amount of water demand during construction and operation, implementation of the Project would have a less than significant impact on available water supplies and no further analysis of this issue is warranted in the EIR.
- c) **Less Than Significant Impact.** During construction activities, portable restrooms would be available for construction workers and would not contribute to wastewater flows to the public wastewater system. The Project would not exceed the wastewater treatment capacity of the Wastewater Reclamation Plants serving the Priority Areas. There would be no other wastewater other than the storm runoff. No new or expanded wastewater treatment facilities would be required for the Project as the Project does not propose the construction of permanent buildings. Therefore, implementation of the Project would result in less than significant impacts, and no further analysis is warranted in the EIR.
- d) **Less Than Significant Impact.** During construction, the Project would temporarily generate minimal construction debris such as trash, scrap metal, abrasive material, concrete, and general construction scrap which would be disposed of and recycled according to all federal, State, and local solid waste requirements, including AB 939 and the CALGreen Building Code. CALGreen stipulates that 65 percent of construction waste shall be diverted, while AB 939 specifies 50 percent. Compliance with all applicable statutes and regulations would ensure that Project impacts are less than significant. All construction debris would be exported to Buttonwillow



Landfill in Kern County, located northwest of the Project. The Buttonwillow facility serves a wide variety of customers throughout California, with a permitted landfill capacity of 950,000 cubic yards (Clean Harbors). Since the Project proposes future broadband infrastructure installations with no planned development at this time, the Project would generate a minimal amount of solid waste for a temporary period of 24 months and no new additional waste beyond existing conditions would be generated as a result of the Project. Therefore, implementation of the Project would result in less than significant impacts related to solid waste capacity and further analysis of this issue is not warranted in the EIR.

- e) **Less Than Significant Impact.** During construction, the Project would be required to comply with all applicable regulations pertaining to solid waste disposal. These regulations include AB 939 which requires each city in the State to divert at least 50 percent of their solid waste from landfill disposal through source reduction, recycling, and composting (CalRecycle, 2024). Therefore, the Project would comply with federal, State, and local statutes and regulations related to solid waste. Therefore, implementation of the Project would result in less than significant impacts regarding compliance with federal, State, and local solid waste regulations and no further analysis of this issue is warranted in the EIR.

## References

California Department of Resources Recycling and Recovery (CalRecycle) 2024. AB 939 Enforcement. Available at: <https://calrecycle.ca.gov/LGCentral/Enforcement/>. Accessed April 2024.

Clean Harbors. Transportation and Disposal- Buttonwillow Facility. Available at: <https://www.cleanharbors.com/sites/g/files/bdczcs356/files/pdffdocuments/Buttonwillow%2C%20CA%20Facility%20Fact%20Sheet%20-%20880437.pdf>. Accessed April 2024.

## Wildfire

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XX. WILDFIRE</b> — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Less Than Significant Impact.** As discussed previously in Response IX.f), emergency response services within the identified Priority Areas are provided by the SBCFD, GFD, U.S. Forest Service, SBCSO, and GPD, as applicable by jurisdiction (County of Santa Barbara, 2024). The Project proposes future broadband infrastructure installations in various communities throughout the County, consisting of underground cables and pole-mounted cables and associated appurtenances within the nine Priority Areas and other site within the County yet to be determined, with construction occurring predominantly along existing public and private roadways. Project construction activities would be contained entirely within the defined Project areas and served by the SBCFD, GFD, U.S. Forest Service, SBCSO, and the GPD for fire protection, police protection, and emergency medical services, as appropriate, depending on the specific location of construction activities. All construction activities would take place outside of main public roadways to the extent feasible, with work within the ROW occurring only where necessary. While some construction activities could result in temporary lane closures or local detours while construction activities are occurring, complete blockage or closure of local access routes within the Priority Areas are not anticipated to be necessary. While such temporary traffic effects would result in localized slowing or even minor congestion during peak periods during the construction workday, the proposed construction activities would not be expected to result in substantial impairment of an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant, and no further analysis is warranted in the EIR.
- b) **Less Than Significant Impact.** Refer to the discussion provided above in Response IX.g). According to CAL FIRE, most of the nine Priority Areas are located within a designated Fire Hazard Severity Zone (FHSZ) under the jurisdiction of various fire protection agencies.

As noted above, the Project proposes future broadband infrastructure installations in various communities within the County and does not propose any development. The Project broadband infrastructure would consist of new fiber-optic lines installed underground following public or private roadways with the intention to minimize or avoid disturbance of roadway surfaces wherever feasible. The Project would also include installation of construction activities within those areas where lateral lines are installed between public or private roadways and individual businesses or residences. The broadband installations would avoid sensitive habitats, including areas with extensive vegetation and trees that could serve as fuel sources for wildfires, wherever feasible. Construction and operation activities would require periodic vegetation removal and maintenance, minimizing wildland fire risks within the nine Priority Areas and the areas surrounding future broadband installation projects. Additionally, the Project would not involve the installation of new power lines or other potential sources of ignition, and future projects would occur in areas with established utility infrastructure (including water supply for firefighting) and existing fire protection services and facilities. Therefore, implementation of the Project would not exacerbate wildfire risks or expose people or structures to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant, and no further analysis is warranted in the EIR.

- c) **Less Than Significant Impact.** As noted in Response XX.b), above, the identified Priority Areas are largely located within FHSZs (CalFire, 2024). The Project includes future broadband infrastructure installation and would only include installation of new utility poles in limited circumstances. Since the broadband installations are intended to occur predominantly underground, the Project components would not have the potential to exacerbate wildfires in Moderate, High, and Very High FHSZ since fiber optic cables, even if mounted on poles above-ground, lack the capacity to create a spark or overheat such that ignition of a fire could result from operation of the broadband facilities. In addition, Project construction and operation would include vegetation removal to minimize wildfire risks and the Priority Areas, as well as future broadband project areas, would be served by adequate fire protection and emergency services that already serve these established, albeit relatively rural, communities. The Project does not propose installations of fuel breaks, emergency water sources, or other utilities that may result in temporary or ongoing impacts to the environment. Therefore, implementation of the Project would result in less than significant impacts associated with installation and maintenance of associated utilities. No further analysis is warranted in the EIR.
- d) **Less Than Significant Impact.** For the reasons set out in the Geology and Soils and Hydrology and Water Quality sections of this Initial Study, less than significant impacts to people or structures would occur due to significant risks, including exposing people or structures to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, less than significant impacts related to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would occur. No further analysis is warranted in the EIR.

## References

County of Santa Barbara, 2024. Santa Barbara County Safety Element Map. Available at: <https://www.countyofsb.org/974/Seismic-Safety-Safety>. Accessed April 2024.

California Department of Forestry and Fire Services (CalFire), 2024. Available at: <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>. Accessed April 2024.

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## Mandatory Findings of Significance

<i>Issues (and Supporting Information Sources):</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE —</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

- a) **Potentially Significant Impact.** As noted in Sections IV, V, and VIII, above, implementation of the Project could have the potential to degrade the quality of the environment and reduce the habitat of protected species. Although construction is anticipated to mostly occur along existing roadways within disturbed areas, the potential exists for impacts to occur to biological resources, cultural resources, and tribal cultural resources. Therefore, these issues will be evaluated further in the EIR.
- b) **Potentially Significant Impact.** Implementation of the proposed Project throughout the County could contribute to cumulatively considerable impacts. Potentially significant impacts are discussed throughout this Initial Study and cumulative effects will be evaluated for those topics requiring further analysis in the EIR.
- c) **Potentially Significant Impact.** Environmental effects that may cause a potentially significant impact on human beings, either directly or indirectly, will be evaluated further in the EIR.

## References

N/A

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# **Santa Barbara County Last-Mile Broadband Program**

*June 6, 2024*

Environmental Impact Report  
Public Scoping Meeting





# Santa Barbara County Last-Mile Broadband Program

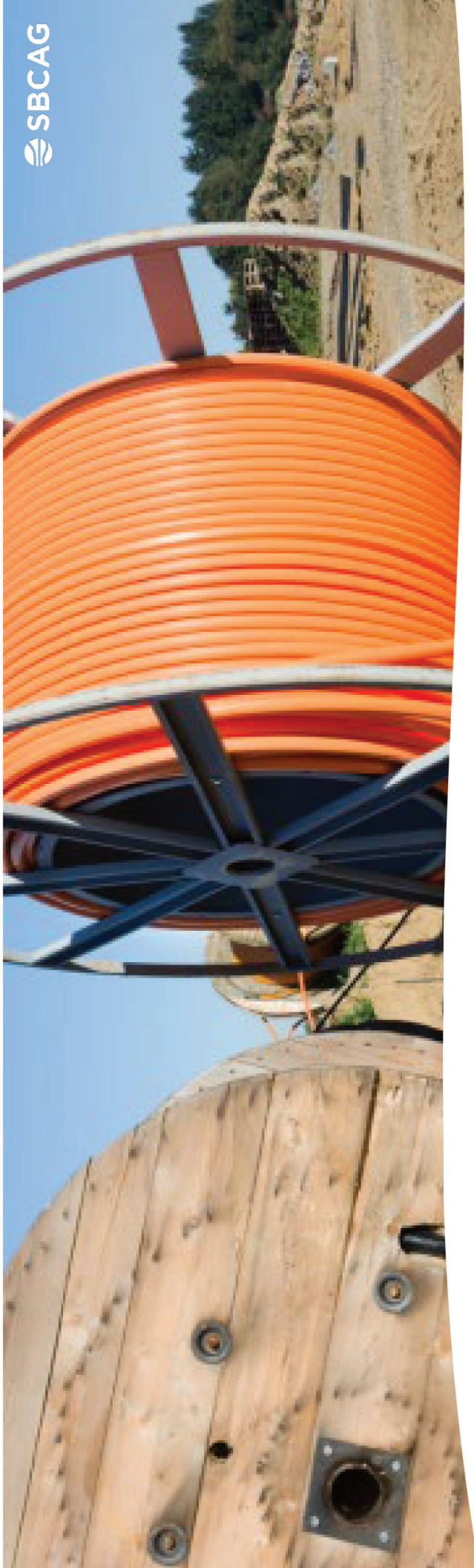
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## Environmental Impact Report Public Scoping Meeting

### Meeting Facilitators/Agency Representatives:

- **Fred Luna**, Director of Project Delivery and Construction, SBCAG
- **Lauren Bianchi Klemann**, Government Affairs/Public Information Manager, SBCAG
- **Jasmine McGinty**, Principal Analyst – County Executive Office, County of Santa Barbara
- **David Crook**, AICP, Principal Planner – Environmental Science Associates (Consultant)

*June 6, 2024*



## Why we are here

### Purpose:

- CEQA requires a scoping meeting as part of the Notice of Preparation process

### Objectives:

- Provide Project Background, Project Location, and Project Description
- Discuss proposed scope of the PEIR for the Project
- Solicit input and refine scope of the environmental analysis



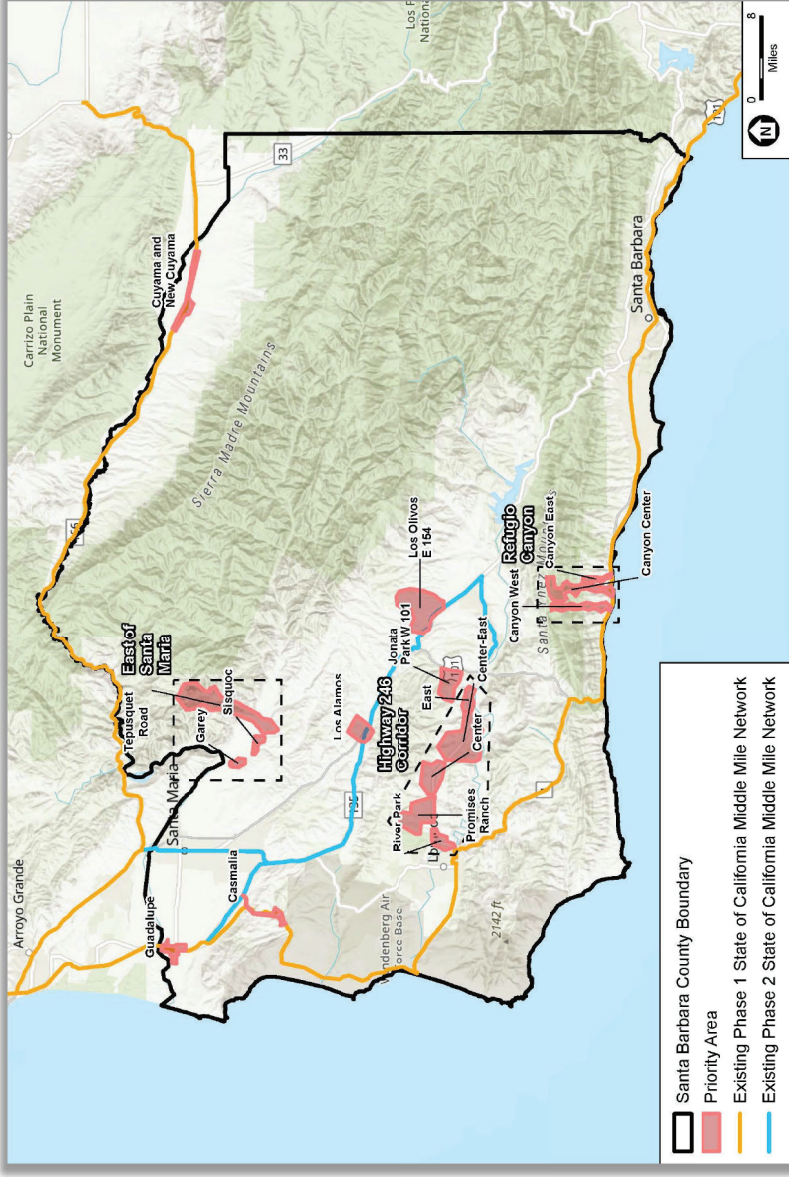
# Project Background

- **Broadband Strategic Plan**
  - Broadband Alliance prepared the countywide Broadband Strategic Plan
  - Goal to expand broadband internet access to unserved and underserved
- **Local Agency Technical Assistance Grant (LATA)**
  - Funds received by SBCAG and County of SB for implementation
  - Includes funding for a Program Environmental Impact Review (PEIR)
  - PEIR evaluated last mile installations across SB County
- SBCAG released the Notice of Preparation (NOP) of a PEIR for a 30-day public review and comment period on **May 30, 2024, through July 1, 2024.**



# Project Location

- Across Santa Barbara County with focus on unserved/ underserved communities
- Priority Areas - 9 locations
  - Four near-term Priority Areas already designed
  - Five additional areas to be designed
- Additional Future project locations to be determined based on need and funding for projects







# Project Description

## New fiber optic installations

- Underground
- Adjacent to public or private roadways
- Limited installation under roadways
- Typically installed within previously disturbed and/or developed areas
- Avoids drainages and sensitive habitats.

## New Aerial Installations

- Not anticipated but could be undertaken in limited circumstances.



# Project Description (Cont.)

## Project components

- Broadband conduit with diameters between  $\frac{3}{4}$ -inch and 2 inches
- Aboveground, prefabricated walk-in hut/shelters
- Small aboveground steel distribution cabinets/enclosures
- Distribution fiber, splice points, and drops; drop hubs; and small underground structures such as hand holes

## Operations and Maintenance

- Incidental maintenance
- Weed abatement
- Periodic accessing of hand holes and splice cases



# CEQA Process

- SBCAG - Lead Agency for PEIR to facilitate future broadband project implementation in the County
- PEIR is a “first-tier” CEQA document that may serve as a foundation for subsequent, site-specific environmental review documents
- PEIR
  - County-wide program level assessment with project-level analysis of Priority Areas
  - Includes program- and project-level mitigation measures
  - Includes a range of reasonable alternatives to the Project that would feasibly attain most of the basic objectives.

# PEIR Scope of Environmental Effects

## 20 Potential Environmental Factors

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology and Water Resources
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire



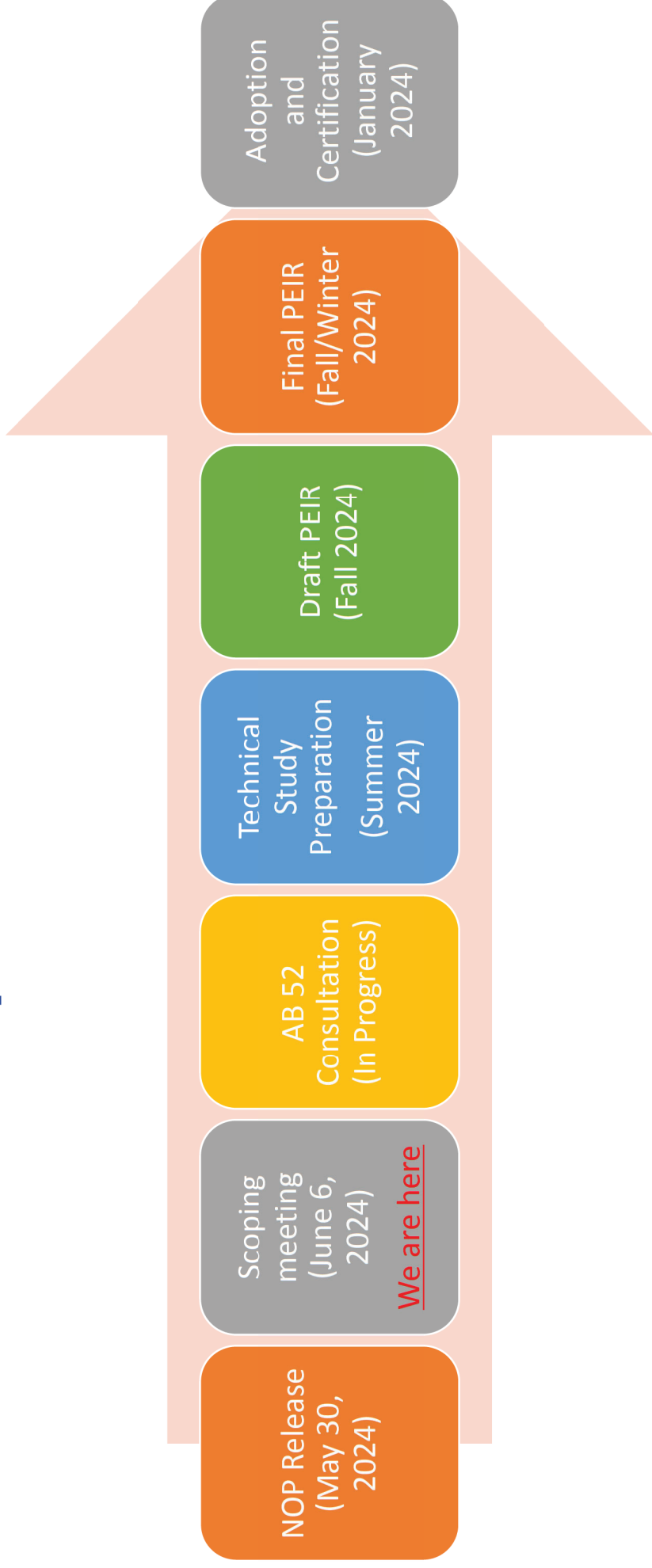
# PEIR Scope of Environmental Effects

## Issues Selected for PEIR Analysis

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources (including Paleontological Resources)
- Energy
- Geology, Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology and Water Resources

- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

# Timeline/Next Steps



# Public Participation

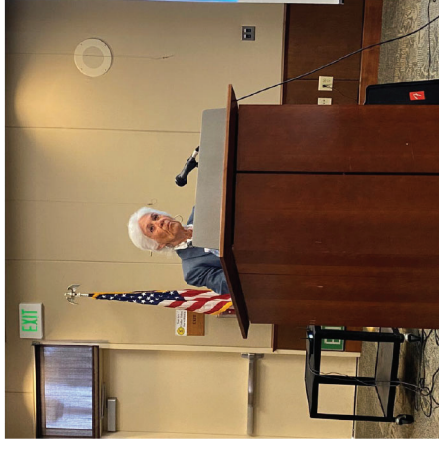
Mail written comments to SBCAG by  
5p.m., **July 1, 2024**, to the address below:

Santa Barbara County Association of Governments  
Attn: Fred Luna  
260 North San Antonio Road, Suite B  
Santa Barbara, CA 93110

OR submit comment electronically to:

[info@sbccag.org](mailto:info@sbccag.org)

OR provide verbal comments TODAY







# Thank You!

*For more information and to review Project documents,  
Please scan the QR code or follow the link:*

**Website:**  
[www.sbcag.org](http://www.sbcag.org)

**Webpage:**  
<https://www.sbcag.org/last-mile-broadband-program-notice-of-preparation-for-environmental-impact-report/>



All written, verbal, and electronic comments/questions received from the scoping meeting and staff responses will be available on the SBCAG website.

June 27, 2024

Fred Luna  
SBCAG  
260 North San Antonio Road, Suite B  
Santa Barbara, CA 93110

Sent Via Email: [info@sbcag.org](mailto:info@sbcag.org)

**Re: Air Pollution Control District Response to Notice of Preparation of an Environmental Impact Report for the Santa Barbara County Last-Mile Broadband Program**

Dear Fred Luna:

The Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Santa Barbara County Last-Mile Broadband Program. The Santa Barbara County Association of Governments (SBCAG) proposes installing fiber optic cable in various locations throughout the County focusing in nine priority areas. The project involves working with a broadband infrastructure provider that would design, permit, construct, operate, and maintain all proposed network facilities. New fiber optic lines would be installed underground following public or private roadways, and aerial installation when subsurface installation is not feasible. Once constructed, the broadband network would operate passively with minimum maintenance.

District staff reviewed the Initial Study and NOP of a Draft EIR, and concurs that air quality impacts should be addressed in the EIR. The District's guidance document, entitled *Scope and Content of Air Quality Sections in Environmental Documents* (updated January 2022), is available online at [www.ourair.org/land-use](http://www.ourair.org/land-use). This document should be referenced for general guidance in assessing air quality impacts in the Draft EIR. The EIR should evaluate the following potential impacts related to the project:

**1. Attainment Status and Consistency with the District's Ozone Plan.** Attainment status for the County is posted on the District website at [www.ourair.org/air-quality-standards](http://www.ourair.org/air-quality-standards). The most recent Ozone Plan (previously known as the Clean Air Plan) was adopted in December 2022 and is available at [www.ourair.org/clean-air-plans](http://www.ourair.org/clean-air-plans). The District website should be consulted for the most up-to-date air quality information prior to the release of the Public Draft EIR.

Consistency with local and regional plans, including the District's 2022 Ozone Plan, is required under CEQA for all projects. Consistency with the Ozone Plan should be evaluated on a case-by-case basis, and the EIR should include an assessment of whether the proposed project will be consistent with the Ozone Plan. The Ozone Plan relies primarily on land use, population, and on-road emissions projections provided by the California Air Resources Board (CARB) as a basis for vehicle emission forecasting. All development projects should be evaluated to determine whether direct and indirect emissions

associated with the project are accounted for in the Ozone Plan's emissions growth assumptions, and whether the project is consistent with policies adopted in the Ozone Plan.

Many industrial and manufacturing sources, as well as buildings with large heating devices or generator engines, may be subject to District rules and permit requirements. Commercial or industrial stationary source projects will generally be considered consistent with the Ozone Plan if they are consistent with District rules and regulations. Large industrial stationary sources may be found inconsistent if their emissions are not considered in the Plan's stationary source emission inventory.

**2. Construction Impacts.** The EIR should include a description and quantification of potential air quality impacts associated with construction activities for the proposed project. The District's January, 2022 *Scope and Content of Air Quality Sections in Environmental Documents*,<sup>1</sup> Section 6, presents recommended mitigation measures for fugitive dust and equipment exhaust emissions associated with construction projects. Construction mitigation measures should be enforced as conditions of approval for the project. The EIR should include a Mitigation Monitoring and Reporting Plan that explicitly states the required mitigation and establishes a mechanism for enforcement.

**3. Asbestos Reporting Requirements.** If the project will involve any demolition or renovation of existing structures, the EIR should include a discussion of how materials will be removed in compliance with District Rule 1001 – National Emission Standards for Hazardous Air Pollutants (NESHAP) – Asbestos. Advance notification to the District may be required before asbestos is disturbed and/or removed. For additional information regarding asbestos notification requirements, please visit our website at [www.ourair.org/asbestos](http://www.ourair.org/asbestos).

If the project area to be disturbed: a) is located in a geographic ultramafic rock unit; b) has naturally-occurring asbestos, serpentine, or ultramafic rock as determined by the owner/operator; or c) is discovered by the owner/operator, a registered geologist, or the Air Pollution Control Officer to have naturally-occurring asbestos, serpentine, or ultramafic rock after the start of any construction or grading; then appropriate abatement measures must be undertaken pursuant to the requirements of the Air Resources Board Air Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations (see [www.arb.ca.gov/toxics/asbestos/asbestos.htm](http://www.arb.ca.gov/toxics/asbestos/asbestos.htm)).

We hope you find our comments useful. We look forward to reviewing the Draft EIR. Please contact me at (805) 979-8334 or via email at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org) if you have questions.

Sincerely,



Emily Waddington,  
Air Quality Specialist  
Planning Division

cc: Planning Chron File

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<sup>1</sup> Available at [www.ourair.org/wp-content/uploads/ScopeContentJanuary2022-LimitedUpdates.pdf](http://www.ourair.org/wp-content/uploads/ScopeContentJanuary2022-LimitedUpdates.pdf)



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[wildlife.ca.gov](http://wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



June 28, 2024

Fred Luna  
Santa Barbara County Association of Governments  
260 North San Antonio Road, Suite B  
Santa Barbara, California 93110  
[info@sbacag.org](mailto:info@sbacag.org)

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SANTA BARBARA COUNTY LAST-MILE BROADBAND PROGRAM, SCH NO. 2024051301, SANTA BARBARA COUNTY, CA**

Dear Fred Luna:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the Santa Barbara County Association of Governments (SBCAG) for the Santa Barbara County Last-Mile Broadband Program (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines<sup>1</sup>.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants, and their habitats. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW ROLE**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Fred Luna  
Santa Barbara County Association of Governments  
June 28, 2024  
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projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law<sup>2</sup> of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** Santa Barbara County Association of Governments (SBCAG)

**Objective:** The objective of the Project is to install fiber optic cable in various locations throughout Santa Barbara County (County) to facilitate the future expansion of the County's high-speed broadband internet network.

The Project will include the installation of fiber optic cables in various locations throughout the County. High-level network designs for last-mile connections have been prepared for four Priority Areas, while an additional five Priority Area locations are looking to be advanced for high-level network design. Components to be installed/constructed within the four Priority Areas include the following: broadband conduit with diameters between ¾-inch and 2 inches to be installed within road rights-of-way; aboveground, prefabricated walk-in hut/shelters made of aggregate wall materials; small aboveground steel distribution cabinets/enclosures; distribution fiber, splice points, and drops; drop hubs; and small underground structures such as hand holes. Additional Project components that may be necessary to connect end-users to the middle-mile broadband network may include utility poles with aerial fiber and connection points; underground fiber markers; and signage. Once constructed, the broadband network components would generally operate passively, with only incidental maintenance typically consisting of weed abatement and periodic accessing of hand holes and splice cases from the ground surface along a given alignment.

In general, the new fiber optic lines would be installed underground following public or private roadways with the intention to minimize or avoid disturbance of roadway surfaces wherever feasible. The Project also includes installation and construction activities within those areas where lateral lines are installed between public or private roadways and individual businesses or residences. These connections would be

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<sup>2</sup> "Take" is defined in Section 86 of the Fish and Game Code as, "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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installed within previously disturbed and/or developed areas, and generally would avoid drainage and sensitive habitats.

Construction methods would primarily include horizontal point-to-point underground boring and, if necessary, could include micro-trenching and/or aerial stringing from utility poles.

**Location:** The area subject to future broadband facility installations under the proposed Project includes the entire County of Santa Barbara. With a few exceptions, the specific locations of future broadband facility installations are not currently known.

**Timeframe:** The four Priority Area Projects would be constructed over a period of approximately 24 months beginning in Spring 2025. It is anticipated that future broadband Projects of similar size and scale located in other areas of the County would result in similar construction durations as those assumed for the four Priority Area Projects.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist SBCAG in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

### Specific Comments

1. The NOP indicates that the DEIR for this Project will be a Program DEIR. The NOP states the Program DEIR will:
  - a. provide a broad overview of the potential environmental consequences of the implementation of the Project on a County-wide basis;
  - b. serve as a mid-tier environmental document that will focus and streamline the subsequent project-level review of individual future projects that will be undertaken and in aggregate are referred to as the Project; and
  - c. provide detailed Project-level analysis of the nine Priority Area Project locations that will be evaluated in the DEIR.

CDFW is unable to provide substantive Project-specific comments due to the limited Project information provided to us. Many special-status plant and animal species in the proposed Project area have been reported to the California Natural Diversity Database and should be considered as part of the DEIR this Project.

CDFW is available to meet with SBCAG ahead of the DEIR preparation to discuss potential impacts and possible mitigation measures, including site specific impacts and mitigation measures, for some or all the resources that may be analyzed in the DEIR.



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## General Comments

1. Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects which the proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
2. Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR:
  - a. A complete discussion of the purpose and need for, and description of, the proposed Project.
  - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends SBCAG select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends SBCAG consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

- c. Where the Project may impact aquatic and riparian resources, CDFW recommends SBCAG select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may

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cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.

3. Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information:
  - a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage<sup>3</sup>.
  - b. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*<sup>4</sup>. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.

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<sup>3</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

<sup>4</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

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- c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project site and within adjacent areas. The [Manual of California Vegetation](#), second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts offsite.
  - d. A complete and recent assessment of the biological resources associated with each habitat type in the Project site and within adjacent areas. A full literature review includes but is not limited to [CDFW's California Natural Diversity Database](#)<sup>5</sup> (CNDDDB). The CNDDDB should be accessed to obtain current information on any previously reported sensitive species and habitat. An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project site. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources.
  - e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#)<sup>6</sup> for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and USFWS.
  - f. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.
4. [Direct and Indirect Impacts on Biological Resources](#). The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological

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<sup>5</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>6</sup> <https://wildlife.ca.gov/conservation/survey-protocols>

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resources with specific measures to offset such impacts. The DEIR should address the following:

- a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands.
  - b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).
  - c. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.
  - d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.
  - e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
5. Cumulative Impact. Cumulative impacts on biological resources can result from collectively significant projects. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts on biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)). SBCAG's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if SBCAG concludes that the Project would not result in cumulative impacts on

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biological resources, SBCAG, “shall identify facts and analysis supporting the Lead Agency’s conclusion that the cumulative impact is less than significant” (CEQA Guidelines, § 15130(a)(2)).

6. Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).
  - a. The DEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).
  - b. Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, § 15126.4(a)(1)). In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project’s proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
7. Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project’s significant direct and indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.
8. Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring



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and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.

9. Nesting Birds. To avoid impacts to nesting birds, CDFW recommends that clearing of vegetation occur outside of the peak avian breeding season, which general runs from February 1 through September 1 (as early as January 1 for some raptors). If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting breeding bird surveys should conduct weekly bird surveys for nesting birds, within three days prior to work in the area, and ensure no nesting birds in the Project area would be impacted by the Project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. For the given Project site, CDFW generally recommends a 100-foot buffer from common avian species, 300 feet for listed or highly sensitive, and 500 feet for raptors. The buffer should be delineated by temporary fencing and remain in effect as long as construction is occurring. No Project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the Project. Expansions or reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
10. Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
11. CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. Revisions to the



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Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements of a CESA ITP.

12. Scientific Collecting Permit. A scientific collecting permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor Project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see the [Scientific Collecting Permits website](#)<sup>7</sup>.
13. Lake and Streambed Alteration. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or “entity”) must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW’s issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW recommends that SBCAG assess whether notification is appropriate. A Notification package for an LSAA may be obtained by accessing the [Lake and Streambed Alteration Program website](#)<sup>8</sup>.
14. Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission’s (Commission) policies. Through its [Wetlands Resources Policy](#)<sup>9</sup>, the Commission “...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California”. It is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its

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<sup>7</sup> <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

<sup>8</sup> <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

<sup>9</sup> <https://fgc.ca.gov/About/Policies/Miscellaneous#Wetlands>

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legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, Project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

- a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a Project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the DEIR and these measures should compensate for the loss of function and value.
- b. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity

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Database. The CNNDDB field survey form and instructions on submitting information can be found on the [CNDDDB website](#)<sup>10</sup>.

To submit information on special status native plant populations and sensitive natural communities, the *Combined Rapid Assessment and Relevé Form* should be completed and submitted to CDFW's [Vegetation Classification and Mapping Program](#)<sup>11</sup>. SBCAG should ensure data collected for the preparation of the DEIR is properly submitted.

## FILING FEES


The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

## CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist SBCAG in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Kelly Fisher<sup>12</sup>, Environmental Scientist.

Sincerely,

DocuSigned by:  
  
5991E19EF8094C3...

Victoria Tang  
Environmental Program Manager  
South Coast Region

EC: California Department of Fish and Wildlife  
Jennifer Turner, Senior Environmental Scientist (Supervisory)

Office of Planning and Research  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

<sup>10</sup> <https://wildlife.ca.gov/Data/CNDDDB>

<sup>11</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

<sup>12</sup> Phone: 858-354-5083; email: [Kelly.Fisher@wildlife.ca.gov](mailto:Kelly.Fisher@wildlife.ca.gov)

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## REFERENCES

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**David Crook**

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**Subject:** Last Mile High Speed Internet

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**From:** RON FREEMAN <[ronhfreeman@mac.com](mailto:ronhfreeman@mac.com)>

**Sent:** Thursday, June 6, 2024 3:51 PM

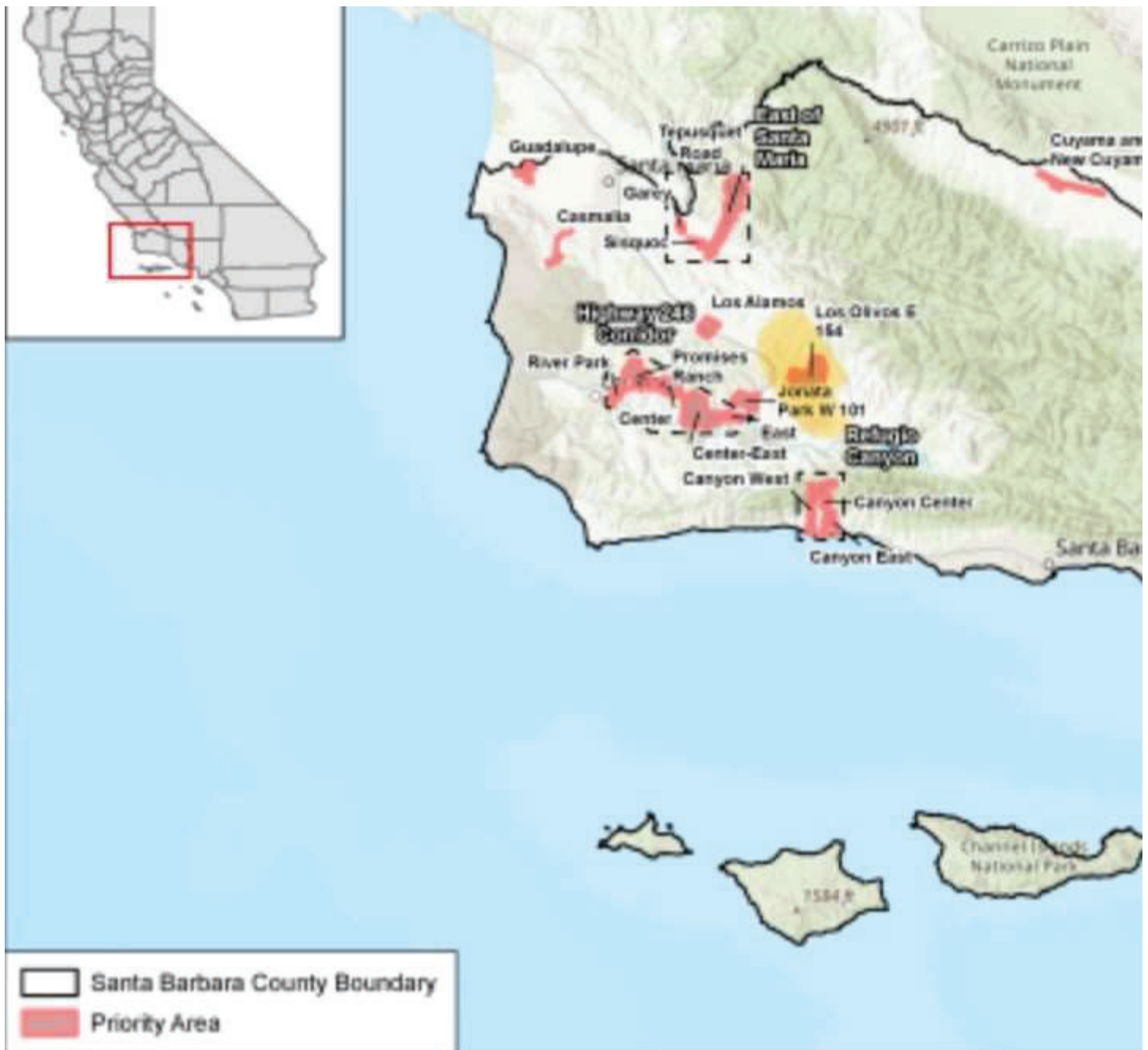
**To:** SBCAG Information Requests <[sbcaginfo@sbcag.org](mailto:sbcaginfo@sbcag.org)>

**Cc:** Joan Hartmann <[jrhartmann@impulse.net](mailto:jrhartmann@impulse.net)>

**Subject:** Last Mile High Speed Internet

Dear Mr. Luna - Recently I heard that efforts were being made to bring broadband internet to rural areas of Santa Barbara County. Currently, we live less than one mile from the Buellton City limits. Unfortunately, we have never been able to get high speed internet for our community of Jonata Springs Ranch. I have included a photo/map to show you just how close we are to Buellton. Our phone lines are serviced by Frontier. From the looks of your map it would appear that we are designated as a high priority area (Jonata Park W101 ). Is that correct?

I look forward to hearing about your efforts to bring broadband internet to our area. Thank you.



Jonata Park 101 Hwy west side.



An aerial photograph of the Santa Ynez Valley. The image shows a mix of green agricultural fields, some brownish-tan fields, and a dense residential area with many small houses. A large, dark, forested area runs diagonally from the top left towards the center. A green location pin with a white flower icon is placed on the edge of the forested area. A large, semi-transparent red shape is overlaid on the bottom right corner of the image.

Santa Ynez Valley  
Botanic Garden

Sincerely,  
Ron Freeman  
1339 Cougar Ridge Rd  
Buellton, ca. 93427  
Ph 805-350-0902

Sent from my iPad