

EXECUTIVE SUMMARY

ES.1 Introduction

This Draft Program Environmental Impact Report (Draft PEIR) has been prepared under the direction of the Santa Barbara County Association of Governments (SBCAG), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132).

This Draft PEIR is being circulated to local, state, and federal agencies, and to interested organizations and individuals who may wish to receive and comment on the document. Publication of this Draft PEIR marks the beginning of a 45-day public review period. The public review period ends January 10, 2025, during which written comments may be directed to the County at address below. Comments on the Project should be directed to:

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Santa Barbara, CA 93101

Email: info@sbcag.org

ES.2 Environmental Procedures

CEQA requires the preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed and the extent and types of impacts that the project and its alternatives would have on the environment, if they were to be implemented.

The basic purposes of CEQA are as follows (14 CCR 15002):

1. Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that impacts to the environment can be avoided or significantly reduced;
3. Prevent significant, avoidable impacts to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency must consider the information contained in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and must adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

ES.2.1 EIR Organization

This Draft PEIR is organized as follows:

The **Executive Summary** of the Draft PEIR is provided at the beginning of this document. This summary outlines the conclusions of the environmental analysis and provides a summary of the Project and the Project alternatives analyzed in this Draft PEIR. The Executive Summary also includes a table summarizing all environmental impacts identified in this Draft PEIR along with the associated mitigation measures proposed to reduce or avoid each impact.

Chapter 1, Introduction, serves as a forward to this Draft PEIR, introducing the Project, the applicable environmental procedures, and the organization of the Draft PEIR.

Chapter 2, Project Description, provides a thorough description of the Project elements, the purpose and need for the Project, Project objectives, and Project components.

Chapter 3, Environmental Setting, presents an overview of the Project's environmental setting, including on-site and surrounding land uses. This chapter also provides a list and the mapped locations of past, present, and probable future projects (i.e., cumulative projects) considered in the analysis of potential Project contributions to cumulative impacts.

Chapter 4, Environmental Impacts and Mitigation Measures, describes the potential environmental impacts of the Project, as well as mitigation measures to reduce or avoid any potentially significant impacts. The discussion in Chapter 4 is organized by 8 environmental issue areas.

The Draft PEIR assesses how the Project would impact each of these 8 resource areas. Each environmental issue addressed in this Draft PEIR is presented in terms of the following subsections:

- **Environmental Setting and Existing Environmental Conditions:** Provides information describing the existing setting on and/or surrounding the Plan Area that may be subject to change as a result of implementation of the Project. This setting discussion describes the conditions that existed when the Notice of Preparation (NOP) was sent to responsible agencies and the State Clearinghouse.
- **Regulatory Setting:** Provides a discussion of Federal, State, and regional regulations, plans, policies, and ordinances applicable to the Project.
- **Methodology:** Provides the methods and approach for determining the level of significance for Project impacts.

- **Significance Thresholds:** Provides criteria for determining the significance of Project impacts for each environmental issue.
- **Environmental Impacts:** Provides a discussion of the characteristics of the Project that may have an impact on the environment, analyzes the nature and extent to which the proposed Project is expected to change the existing environment, and indicates whether the proposed Project's impacts would meet or exceed the levels of significance thresholds.
- **Cumulative Impacts:** Provides a discussion of the characteristics of the Project that may have a cumulative impact on the environment.
- **Mitigation Measures:** Identifies mitigation measures to reduce significant adverse impacts to the extent feasible.
- **Level of Significance After Mitigation:** Provides a discussion of significant unavoidable environmental impacts that cannot be feasibly mitigated or avoided, potentially significant environmental impacts that can be feasibly mitigated or avoided, and impacts that are not significant.
- **References:** Lists the sources cited during preparation of the Draft PEIR.

Chapter 5, Alternatives, discusses alternatives to the Project, including a No Project Alternative. This chapter describes the rationale for selecting the range of alternatives discussed in the Draft PEIR and identifies the alternatives considered by the County that were rejected from further discussion as infeasible during the scoping process. Lastly, Chapter 5 includes a discussion of the environmental impacts of the alternatives that were carried forward for analysis and identifies the environmentally superior alternative.

Chapter 6, Other CEQA Considerations, includes a discussion of issues required by CEQA that are not covered in other chapters. This includes a discussion of significant unavoidable impacts, reasons why the Project is being proposed notwithstanding significant unavoidable impacts, significant irreversible environmental changes, growth-inducing impacts, potential secondary effects caused by the implementation of the mitigation measures for the Project, and effects found not to be significant.

Chapter 7, References, lists the references and sources used in the preparation of this Draft PEIR.

Chapter 8, List of Preparers and Persons Consulted, provides names and contact information of those responsible for writing this Draft PEIR.

Appendices include various supporting documentation for the Project and environmental analysis, as listed in the Table of Contents.

ES.2.2 Types and Purpose of Draft PEIR

This Draft PEIR has been prepared to satisfy the requirements for a Program EIR (or PEIR). Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are typically more conceptual and may contain a more general or qualitative discussion of impacts, alternatives, and mitigation measures than a Project EIR. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the County (as lead agency) with the opportunity to consider broad policy alternatives and program wide mitigation measures and provides the County with

greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive basis. According to Section 15168(a) of the State CEQA Program, a Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either:

- 1) Geographically
- 2) A logical part in the chain of contemplated actions
- 3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- 4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

A Program EIR is appropriate for the Project because it satisfies Section 15168(a) of the State CEQA Guidelines. Specifically, the Project is within one geographic area; is within a logical part in a chain of contemplated actions; would be under the County's rules, regulations, plans, and other general criteria; is carried out under one regulatory authority, the County; and would have generally similar environmental effects, as they relate to increasing growth within the County, which can be mitigated in similar ways.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine whether an additional CEQA document needs to be prepared. However, if the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope and additional environmental documents may not be required (14 CCR 15168[c]). When a Program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the Program EIR into the subsequent activities (14 CCR 15168[c][3]). If a subsequent activity would have effects that were not examined in the Program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The State CEQA Guidelines encourages the use of Program EIRs, citing five advantages in Section 15168(b):

- 1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action;
- 2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis;
- 3) Avoid duplicative reconsideration of basic policy considerations;
- 4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and
- 5) Allow reduction in paperwork.

Furthermore, a California Appellate Court described the difference between a Project EIR and a Program EIR. A Project-level EIR generally focuses on the environmental changes caused by a development project; a Program EIR, on the other hand, generally looks at the broad policy of a planning document (i.e., a general plan, community plan, specific plan, area plan, etc.) and may not address potential site-

specific impacts of the individual projects that may fall within the planning document (*Citing Citizens for a Sustainable Treasure Island v. City and County of San Francisco* [2014] 227 Cal.App.4th 1036). The Project involves the implementation of a broad policy planning document. The project-level details of the implementation of the Project would not be known at the time of preparation of the EIR. The Program EIR approach would provide a sufficient level of analysis for the broad nature of the Project. The level of specificity required in an EIR is determined by the nature of the project and the rule of reason. (Citing *Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* [1993] 18 Cal.App.4th 729, 741-742.) Therefore, the Program EIR is an appropriate approach for the Santa Barbara County Last-Mile Broadband Program.

ES.6 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, however, the specific locations of future broadband facility installations are currently not known. 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. 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) 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. Refer to Chapter 2, *Project Description*, **Figure 2-1, Regional Location** and **Figure 2-2, Broadband Facility Locations**, which provides the regional location of the Project and 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.

ES.3 Project Summary

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.

ES.4 Summary of Project Alternatives

ES.4.1 Alternative 1: No Project Alternative

As required by CEQA, the No Project Alternative is evaluated in this Draft PEIR. Under the No Project Alternative, no activities would take place in order to expand the broadband availability and the service area would remain unchanged from current conditions. Although it is acknowledged that, with the No Project Alternative, there would be no discretionary action by SBCAG, and thus no impact, for purposes of comparison with the other action alternatives, conclusions for each technical area are characterized as “impacts” that are greater, similar, or less, to describe conditions that are worse than, similar to, or better than those of the proposed Project.

ES.4.2 Alternative 2: Reduced Area/Priority Areas Only Alternative

The Reduced Area/Priority Areas Only Alternative would focus on providing rural broadband infrastructure in the identified Priority Areas. It would 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). The Reduced Area/Priority Areas Only Alternative would not allow additional broadband installations beyond these identified communities. This alternative would reduce the total amount of construction that would occur under the Project and would avoid all effects related to the construction or operation of broadband infrastructure within the other yet-to-be identified unserved and underserved communities in the County. In all other respects, this alternative would be the same as the Project. It would include the same connections to existing facilities, new facilities, and construction methods as the Project (See Chapter 2, *Project Description*, of this Draft PEIR), except these activities would occur only in the identified Priority Areas. This alternative is intended to reduce the extent of the Project’s less than significant impacts after mitigation.

ES.4.3 Alternative 3: Existing Infrastructure Alternative

The Existing Infrastructure Alternative would seek to minimize construction-related impacts by prioritizing the use of existing utility poles or underground conduit wherever it exists. New underground conduit would only be installed in areas where no existing aboveground or belowground infrastructure exists. In all other respects, this alternative would be the same as the Project. It would include the same types of connections to Middle-Mile facilities, construction of new buried facilities, and construction methods as Project (See Chapter 2, *Project Description*, of this Draft PEIR), except these activities would occur only when no existing infrastructure is present, thereby limiting the physical footprint of construction while achieving comparable levels of service to the affected communities. This alternative would result in less construction activity and new infrastructure than the Project. It would also result in more aboveground fiber optic line because much of the line would be attached to existing utility poles, rather than being placed in new underground conduit as would occur under the Project. The Existing Infrastructure Alternative is intended to reduce the extent of the Project’s less than significant impacts after mitigation.

ES.4.4 Environmentally Superior Alternative: No Project Alternative

Because the No Project Alternative (described above) would avoid all of the Project's impacts resulting from construction and operation of the proposed program analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project Alternative would not meet the Project Objectives of the program as presented in Chapter 5, Section 5.2.1.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126.6(e)) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As illustrated in Chapter 5, Table 5-1, both Alternatives 2 and 3 would reduce the impacts of the environmental issues analyzed for the Project.

The Reduced Area/Priority Areas Only Alternative (Alternative 2) would result in less overall construction and operation of broadband infrastructure by avoiding all activities outside of the Priority Areas. This would result in incrementally reduced impacts to all resource areas. While this alternative is feasible and would achieve most of the basic Project Objectives, it would achieve the Project Objectives to a lesser degree than the Project because it would not improve broadband availability or reliability outside of the Priority Areas.

The Existing Infrastructure Alternative would result in less overall ground disturbing construction activities of broadband infrastructure than the Project, but greater ground disturbing activities than the Reduced Area/Priority Areas Only Alternative since it would not include construction activities outside of the Priority Areas. This alternative would result in more fiber optic line installed aboveground on existing utility poles. While Existing Infrastructure Alternative would result in less construction-related environmental impacts, it would result in a less reliable broadband network due to the increased prevalence of aboveground fiber optic line that could be affected by human interference or natural disasters, such as wildfires. This potential for disruption would achieve Project Objectives Nos. 1 and 7 to a lesser degree than the Project.

Both the Reduced Area/Priority Areas Only Alternative and the Existing Infrastructure Alternative would offer different environmental benefits when compared to the Project. Both of these alternatives are potentially feasible and would achieve most of the basic Project Objectives, although Project Objectives would be achieved to a lesser degree than under the Project. Alternative 2, the Reduced Area/Priority Areas Only Alternative, is the environmentally superior alternative because it would reduce both construction and operational impacts compared to the Project given its smaller scale of construction activities within a smaller program area.

ES.5 Issues to Be Resolved

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain issues to be resolved including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the Project, the major issues to be resolved include decisions by the lead agency as to the following:

1. Whether the benefits of the Project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.

2. Whether the proposed land use and zoning modifications are compatible with the character of the existing area.
3. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
4. Whether there are other mitigation measures that should be applied to the Project besides the mitigation measures identified in this Draft PEIR.
5. Whether there are any alternatives to the Project that would substantially lessen any of the significant impacts of the Project and achieve most of the basic project objectives.

ES.7 Areas of Controversy

A NOP was distributed for the proposed program on May 30, 2024, to responsible agencies, trustee agencies, interested parties and organizations, and private organizations and individuals that could have interest in the program. The NOP and responses to the NOP are included in Appendix A of this Draft PEIR. Key concerns and issues that were expressed about the Project during the scoping process included the following:

- potential construction-related impacts to air quality,
- potential impacts on tribal cultural resources and consultation with Native American tribes, and
- potential for adverse health effects associated with wireless telecommunications facilities.

All of the substantive environmental issues raised in the NOP comment letters and at the scoping meeting have been addressed or otherwise considered during preparation of this Draft PEIR.

ES.8 Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation

Table ES-1, *Summary of Environmental Impacts, Mitigation Measures, and Level of Significance After Mitigation*, summarizes the potential environmental effects of the Project, the proposed mitigation measures, and the level of significance after mitigation.

TABLE ES-1
SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Air Quality			
Impact 1: Implementation of the Proposed Project could conflict with or interfere with the applicable air quality plan if it significantly increases ROC or NOX emissions to an extent that meeting the CAAQS would be in jeopardy.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 2: Implementation of the Project could result in a cumulatively considerable net increase of ROC, NOX, or PM10 for which the SCCAB is in nonattainment for an applicable federal or state ambient air quality standard.	Less than Significant	No mitigation measures are required.	Less than Significant
Impact 3: Implementation of the Project could expose sensitive receptors to substantial pollutant concentrations of DPM and CO.	Potentially Significant	<p>Mitigation Measure AQ-1: Valley Fever. During heavy grading where the top 12 inches of soil would be disturbed, and in locations with potential Valley Fever fungal spores (i.e., disturbance of the top soil of undeveloped land to a depth of about 12 inches; dry, alkaline, sandy soils; virgin, undisturbed, non-urban areas; windy areas; and archaeological resources probable or known to exist in the area (Native American midden sites), construction contractors will comply with the following measures as feasible to reduce potential Valley Fever impacts:</p> <ul style="list-style-type: none"> • Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. • Require that the cabs of grading and construction equipment be air-conditioned or enclosed with sufficient ventilation and particulate matter filtration systems. • Require crews to work upwind from excavation sites where possible. • Where acceptable to the fire department, control weed growth by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering. • During rough grading and construction, ensure that the access way into the project site from 	Less than Significant

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		adjoining paved roadways is paved or treated with environmentally safe dust control agents.	
<p>Impact 4: Implementation of the Project could result in other emissions, such as odors, adversely affecting a substantial number of people.</p>	Less than Significant	No mitigation measures are required.	Less than Significant
Biological Resources			
<p>Impact 1: Implementation of the Project could have a substantial adverse effect, either directly or through habitat modifications, or 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.</p>	Potentially Significant	<p>Mitigation Measure BIO-01: Habitat Assessment. A habitat assessment should be conducted prior to ground-disturbing activities within 500 feet of each project component footprint. If no suitable habitat occurs to support special-status plant species, special-status wildlife species, nesting bird species, or sensitive natural communities, then no further mitigation is necessary. If suitable habitat for any of these sensitive resources is determined to be present, then one or more of the following mitigation measures may be applicable.</p> <p>Mitigation Measure BIO-02: Special-Status Plant Species. If suitable habitat for special-status plant species is identified during the Habitat Assessment (conducted pursuant to Mitigation Measure BIO-01: Habitat Assessment), a special-status plant survey focusing on the special-status plant species with a moderate to high potential to occur shall be conducted by a qualified biologist prior to construction. The surveys should take place during the appropriate blooming period for each species. If any special-status plant species are observed during the focused surveys, these species should be avoided by the Project.</p> <p>If avoidance of the special-status plant species is not feasible and Project-related impacts to special-status plants may be significant, a mitigation strategy for special-status plant species that may be impacted shall be developed by a qualified biologist. The mitigation strategy may include partial avoidance, on-site or off-site restoration, translocation, and/or seed collection to create a similar population (e.g., based on number of individual plants, similar density over area, or both). If restoration and/or translocation is needed, a restoration/revegetation plan must be prepared and approved by CDFW. At a minimum, the plan should specify the following:</p>	Less than Significant

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • A summary of impacts; • The location of the mitigation site; • Methods for harvesting seeds or salvaging and transplanting individuals to be impacted; • Measures for propagating plants or transferring living plants from the salvage site to the mitigation site; • Site preparation procedures for the mitigation site; • A schedule and action plan to maintain and monitor the mitigation site; • Performance standards by which to measure the success of the mitigation; and • Contingency measures, such as replanting or weeding, if mitigation efforts are not successful. <p>Mitigation Measure BIO-03: Construction Worker Environmental Awareness Program (WEAP). If any sensitive biological resources (i.e., special-status species with a moderate to high potential to occur, sensitive natural communities, or aquatic resources) are determined to be present within or near construction areas during the Habitat Assessment, the Project Applicant shall retain a qualified biologist to conduct a pre-construction WEAP training for all personnel working at the construction site. The WEAP should inform workers in recognizing special-status species and regulated biological resources known to occur or potentially occur on the site and avoidance buffers and measures necessary to avoid and/or minimize potential impacts to biological resources.</p> <ul style="list-style-type: none"> • All personnel associated with Project construction should attend the WEAP training prior to initiation of Project construction activities (including, but not limited to, site preparation, staging and mobilization, vegetation clearance/mowing/trimming, grading, and excavation). The training should include information about the special-status species potentially occurring within the Project Site, identification of special-status species and their habitats, a description of the regulatory status and general ecological characteristics of special-status species, and a review of the limits of construction 	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>and measures required to avoid and/or minimize impacts to biological resources within the work area. A fact sheet conveying this information should also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the Project.</p> <ul style="list-style-type: none"> All employees working at the Project Site shall be required to sign a form provided by the qualified biologist documenting they have attended the WEAP and understand the information presented to them. The signed form should be provided to the Project Applicant as documentation of training completion. The crew foreman should be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species and other regulated biological resources. If new personnel are brought onto the Project after completion of the initial WEAP training, the training should be conducted for all new personnel before they can participate in construction activities. <p>Mitigation Measure BIO-04: Qualified Biological Monitor. If any sensitive biological resources (i.e., special-status species with a moderate to high potential to occur, sensitive natural communities, or aquatic resources) are determined to be present within or near construction areas during the Habitat Assessment, the Project Applicant shall retain a qualified biological monitor(s) with relevant experience with the biological resources and regulations in the County. The qualified biologist should be present during initial ground disturbance or vegetation removal activities and should have the authority to temporarily stop work if special-status species are observed that may be impacted by Project activities. The biologist should recommend measures for compliance with avoidance and minimization measures and applicable permit conditions related to the protection of biological resources.</p> <p>Mitigation Measure BIO-05: Invasive Plant Species Control Measures. If any sensitive biological resources (i.e., special-status species with a moderate to high potential to occur, sensitive natural</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>communities, or aquatic resources) are determined to be present within or near construction areas during the Habitat Assessment, the Project Applicant shall require construction contractors to ensure that equipment is free of invasive plant seeds, propagules, and any material which may contain them (e.g., soil). For purposes of this mitigation measure, invasive plant species should include all species with a Cal-IPC rating of moderate or high. Prior to entering the construction site, equipment should be inspected to confirm it is free of mud, dirt, and debris. For larger sites that would be accessed via non-paved roads, tire track stations should be installed at the construction site entrances and exits, where appropriate. Staging areas and access routes should avoid weed infestations, and infestations within the work area(s) should be flagged and avoided to the maximum extent feasible. Only certified weed-free materials (e.g., fiber rolls, straw, and fill) should be used during construction of future broadband facilities.</p> <p>Mitigation Measure BIO-06: General Construction Best Management Practices. If any sensitive biological resources (i.e., special-status species with a moderate to high potential to occur, sensitive natural communities, or aquatic resources) are determined to be present within or near construction areas during the Habitat Assessment, the Project Applicant shall require construction contractors to adhere to the following general construction best management practices during construction of future broadband network facilities:</p> <ul style="list-style-type: none"> • Construction vehicles shall limit speed to 10 miles per hour within the unpaved limits of construction. • All open trenches or excavations shall be fenced and/or sloped to prevent entrapment of wildlife species or have wildlife ramps available to allow for escape. • All food-related trash items such as wrappers, cans, bottles, and food scraps generated during construction activities shall be disposed of in closed containers only and removed daily from the construction site. • No deliberate feeding of wildlife shall occur. 	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • No pets shall be allowed on construction sites. • No firearms shall be allowed on construction sites. • All vehicle and equipment maintenance shall be performed in designated staging areas. • Access to the construction area shall be limited to established work hours. • If construction activities must be performed at night (i.e., between dusk and dawn), all lighting shall be shielded and directed downwards to minimize light spillover and/or glare. • All construction equipment used on-site shall be properly maintained to avoid leaks of oil, fuel, or residues. • Provisions shall be in place to remediate accidental spills from construction equipment or other construction activities. All vehicle maintenance/fueling/staging shall occur a minimum of 100 feet away from any riparian habitat or water body. Suitable containment procedures shall be implemented to prevent spills. A minimum of one spill kit shall be available at each work location near riparian habitat or water bodies. • No equipment shall be permitted to enter wetted portions of any affected drainage channel. • If the construction of future broadband network installations have the potential to degrade water quality, water sampling shall be implemented to identify the pre-Project baseline, and to monitor during construction for comparison to the baseline. • Any worker who inadvertently injures or kills a special-status species or finds one dead, injured, or entrapped shall immediately report the incident to the construction foreman or biological monitor (recommended under Mitigation Measure BIO-01: Habitat Assessment). The construction foreman or biological monitor shall immediately notify the Project Applicant. <p>Mitigation Measure BIO-07: Revegetation Plan(s). For temporary impacts to natural communities to be returned to pre-Project conditions, a Revegetation</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>Plan(s) (one or more) shall be prepared by a qualified biologist prior to starting construction of the future broadband network facilities and shall be implemented by the Project Applicant following completion of construction. The Revegetation Plan shall guide and ensure successful restoration of self-sustaining habitats, and shall include, at a minimum, the following:</p> <ul style="list-style-type: none"> • A native planting palette appropriate for each vegetation type being restored and appropriate to local conditions. • Qualitative and quantitative monitoring methods to ensure that performance standards are tracked and met for a minimum 3-year period or until pre-Project conditions are restored to equivalent or better condition. <p>Mitigation Measure BIO-08: Endangered/Threatened Wildlife Species. If the results of the Habitat Assessment, completed as required by Mitigation Measure BIO-01: Habitat Assessment, determine that suitable habitat may be present for endangered or threatened special-status wildlife species (see Appendix C for special-status species listing status) then prior to construction within 500 feet of areas that could support endangered/threatened wildlife species, protocol surveys shall be conducted by a qualified biologist in accordance with the most recent applicable USFWS and/or CDFW protocol guidelines.</p> <p>If endangered/threatened wildlife species are observed during the protocol surveys, direct and indirect impacts to occupied habitat should be avoided. In addition to avoiding direct mortality of these endangered/threatened wildlife species and direct impacts to occupied habitats, additional avoidance and mitigation measures may be required, such as constructing Project facilities outside the breeding season, establishing a suitable avoidance buffer around known territories, and restricting activities around certain times of year. If the Project results in potential direct or indirect impacts to endangered/threatened wildlife species and/or occupied habitats, the Project Applicant shall consult with USFWS and CDFW to ensure compliance with the Federal Endangered Species Act and/or California</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>Endangered Species Act, which may include obtaining a “take” permit (e.g., Biological Opinion from USFWS, CESA Section 2081 Incidental Take Permit or CESA Section 2080.1 Consistency Determination from CDFW) and mitigation for permanent impacts occupied habitat (e.g., at a minimum mitigation-to-impact ratio of 2:1 or greater).</p> <p>Mitigation Measure BIO-09: Non-Listed Special-Status Wildlife Species. Several State Species of Special Concern may be impacted by construction of future broadband network facilities. If the results of the Habitat Assessment, completed as required by Mitigation Measure BIO-01: Habitat Assessment, determine that suitable habitat may be present for non-listed special-status wildlife species (see Appendix C for special-status species listing status) and Project impacts may be potentially significant, then prior to construction within 500 feet of areas that could support non-listed special-status wildlife species, the following measures shall be applicable to the future broadband network facilities:</p> <ul style="list-style-type: none"> • Pre-construction clearance surveys shall be conducted by a qualified biologist within 14 days prior to the start of construction (including staging and mobilization). The surveys shall cover the entire disturbance footprint plus a minimum 200-foot buffer, if feasible, and shall identify all special-status wildlife species that may occur on-site. Any non-listed special-status species observed shall be relocated from the site either through direct capture or through passive exclusion. • If any special-status animal species are present within or near construction areas, a WEAP training shall be implemented by the qualified biologist during construction activities to avoid and/or minimize potential impacts to these species (see Mitigation Measure BIO-03: Construction Worker Environmental Awareness Program). • A qualified biologist shall be present during all initial ground disturbing activities, including vegetation removal. 	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> • Any special-status wildlife species observed by the qualified biologist or construction crew shall be allowed to move out of harm’s way. All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. At the end of each workday, excavations shall be secured with cover or a ramp provided to prevent wildlife entrapment. • Upon completion of construction of the future broadband network facilities, a qualified biologist shall prepare a Final Compliance report documenting compliance activities implemented during construction, including the pre-construction survey results. The report shall be submitted within 30 days of completion of construction. <p>Mitigation Measure BIO-10: Nesting Birds. If the results of the Habitat Assessment, completed as required by Mitigation Measure BIO-01: Habitat Assessment, determine that suitable habitat for nesting birds is identified at future broadband facility sites and construction is scheduled to commence during the avian nesting season (February 1–August 31 for songbirds, and January 15 to August 31 for raptors), a qualified biologist shall conduct a nesting bird survey within 7 days of the anticipated start date to identify any active nests within 500 feet of the Project Site. If an active nest is detected, a suitable avoidance buffer shall be established by the qualified biologist in the field. Construction activities shall not occur within the buffer until a qualified biologist determines that the nest is no longer active (e.g., chicks have fledged). Appropriate buffer distances are generally 300 feet for passerine species and up to 500 feet for raptors; however, these may be reduced at the discretion of the qualified biologist depending on site-specific factors such as the location of the nest, species tolerance to human presence, and the types of construction-related noises, vibrations, and human activities that are expected occur. If construction temporarily ceases for a period greater than 7 days, and activities expect to recommence during the avian nesting season, the Project Site (including surrounding 500 feet) shall be resurveyed. If nesting birds are present within 500 feet of the Project Site, construction WEAP training shall be implemented by the qualified biologist during</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>construction activities to avoid or minimize potential impacts to nesting birds (see Mitigation Measure BIO-03: Construction Worker Environmental Awareness Program) and monitoring may be recommended for any work in the vicinity of nest avoidance buffers if determined necessary by the qualified biologist (per Mitigation Measure BIO-04: Qualified Biological Monitor).</p> <p>Mitigation Measure BIO-11: Bats. If the results of the Habitat Assessment, completed as required by Mitigation Measure BIO-01: Habitat Assessment, determine that suitable habitat may be present for special-status bat species, then, prior to construction within 500 feet of areas that could support bat species, the following measures shall be applicable to the future broadband network facilities:</p> <ul style="list-style-type: none"> • A qualified biologist shall conduct presence/absence surveys for bats within 30 days prior to the start of construction. Surveys shall be conducted using acoustic detectors and by searching tree cavities, crevices, and other areas where bats may roost. • If active roosts are located, the roost shall be avoided and Project construction activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement of activities or provision of a suitable buffer (of no less than 100 feet) around the roost until roosting activities cease. Exclusion devices such as netting may be installed to discourage bats from occupying the site in consultation with the CDFW. If a roost is determined by a qualified biologist to be used by a large number of bats (large hibernaculum), bat boxes shall be installed near the Project Site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultations with the CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been 	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>determined that the roost is clear of bats, the roost shall be removed immediately.</p> <p>Mitigation Measure BIO-12: Monarch Butterfly. Prior to completion of the final design, a qualified biologist shall review the planned future broadband network facilities for potential to impact monarch butterflies. If known or potential winter roost sites may be impacted, the biologist shall make recommendations to avoid impacts including, but not limited to, relocation/redesign of project features to avoid roost sites, guidance regarding tree removal and trimming at roost sites, and recommendations regarding planting additional roost trees.</p> <p>Between October 1 and March 1, construction shall not occur within 100 feet of known or potential roost sites, if feasible. If construction must occur during this period, a qualified biologist shall survey known and potential roost sites to confirm occupancy by monarch butterflies prior to the start of any construction within 100 feet. Multiple surveys may be necessary, and the closest known roost sites shall be used as voucher sites to confirm the timing of butterfly arrival. If monarch butterflies are found at a roost site, construction shall not occur within 100 feet of the roost site until the biologist has determined that the butterflies have left the area. The biologist shall visit the voucher sites to confirm that butterflies have left the region.</p> <p>Mitigation Measure BIO-13: Critical Habitat. If critical habitat will potentially be impacted by the Project, but there is no "federal nexus" for the Project (e.g., impacts to a federally listed species, impacts to USACE waters or wetlands, federal funding), then no further mitigation is necessary. However, if critical habitat will potentially be impacted by the Project; there is a federal nexus for the Project; and the habitat to be impacted contains PCEs to support the federally-listed species (as defined in the Federal Register designating critical habitat for that species), then consultation with the USFWS shall be required and may include mitigation for permanent impacts critical habitat (e.g., at a minimum mitigation-to-impact ratio of 1:1 or greater, or as determined by the USFWS).</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Impact 2: Implementation of the Project could have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.</p>	<p>Potentially Significant</p>	<p>Mitigation Measures BIO-01, BIO-03, BIO-05, BIO-06, and BIO-07 are required.</p> <p>Mitigation Measure BIO-14: Sensitive Natural Communities. Sensitive natural communities, as defined by CDFW, shall be mapped within the vicinity of future broadband facilities per Mitigation Measure BIO-01: Habitat Assessment. This map will be used during Project design to determine if sensitive natural communities can be avoided.</p> <p>Sensitive natural communities identified for avoidance should be demarcated (e.g., using brightly colored flagging) and avoided during Project construction. The marked boundaries should be maintained for the duration of Project construction activities in each work area and should be clearly visible to personnel on foot and by heavy equipment operators. If sensitive natural communities can be avoided, then no further mitigation is necessary.</p> <p>If future broadband facilities cannot be sited to avoid temporary impacts to sensitive natural communities, sensitive natural communities shall be returned to pre-Project conditions (i.e., pre-Project elevation contours and revegetation initiated) within six months after the construction is completed, and will be monitored for three years, or until a qualified biologist determines that affected natural communities have been restored to equivalent or better condition as compared to pre-Project conditions. A Revegetation Plan shall be prepared which would include implementation requirements for re-seeding/re-planting the area with locally indigenous native species, performance standards, success criteria, maintenance requirements, and monitoring requirements.</p> <p>If future broadband facilities cannot be sited to avoid permanent impacts to sensitive natural communities, impacts to sensitive natural communities shall be mitigated at a 1:1 impact-to-mitigation ratio. This may include, but is not limited to:</p> <ul style="list-style-type: none"> • The purchase of credits from a mitigation bank or in-lieu fee program; • On- and/or off-site land acquisition and preservation; and/or 	<p>Less than Significant</p>

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> On- and/or off-site creation, restoration, and/or enhancement of sensitive natural communities. <p>If compensatory mitigation is to occur on- or off-site (i.e., not a mitigation bank or in-lieu fee program), a Sensitive Natural Community Mitigation and Monitoring Plan shall be prepared by a qualified biologist/restoration ecologist. The plan shall include details related to implementation requirements (e.g., seeding, planting, and/or staking of sensitive natural community species; salvage/dispersal of duff and seed bank; and/or removal of invasive, non-native species), performance standards, maintenance requirements, and future monitoring requirements.</p> <p>Mitigation Measure BIO-15: Aquatic Resources. An aquatic resources delineation shall be conducted to determine the limits of potential jurisdictional aquatic resources within the vicinity of future broadband facilities. The results of the aquatic resources delineation will be used during project design to determine if aquatic resources can be avoided.</p> <p>Aquatic resources identified for avoidance should be demarcated (e.g., using brightly colored flagging) and avoided during Project construction. The marked boundaries should be maintained for the duration of Project construction activities in each work area and should be clearly visible to personnel on foot and by heavy equipment operators. If aquatic resources can be avoided, then no further mitigation is necessary.</p> <p>If aquatic resources will potentially be impacted by the Project, then the appropriate regulatory permits shall be obtained (e.g., CWA Section 404 Nationwide Permit from the USACE, CWA Section 401 Water Quality Certification or Porter-Cologne Act Waste Discharge Requirement permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Wildlife Code from the CDFW). The following would be incorporated, as a minimum, into the permitting, subject to approval by the regulatory agencies:</p> <ul style="list-style-type: none"> On- and/or off-site creation, restoration and/or enhancement of USACE/RWQCB jurisdictional wetlands, waters of the U.S., and/or waters of the State at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore 	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>impact area to pre-Project conditions (i.e., pre-Project contours and revegetate with native species, where appropriate). Off-site creation, restoration, and/or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program.</p> <ul style="list-style-type: none"> On- and/or off-site creation, restoration, and/or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore impact area to pre-Project conditions (i.e., pre-Project contours and revegetate with native species, where appropriate). Off-site creation, restoration, and/or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program. 	
<p>Impact 3: Implementation of the Project could have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means.</p>	Potentially Significant	Mitigation Measures BIO-01, BIO-03, BIO-06, and BIO-15 are required.	Less than Significant
<p>Impact 4: Implementation of the Project could 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.</p>	Potentially Significant	Mitigation Measures BIO-01, BIO-03, BIO-06, BIO-07, and BIO-10 are required.	Less than Significant
<p>Impact 5: Implementation of the Project could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	Potentially Significant	<p>Mitigation Measures BIO-01 through BIO-12 and BIO-14 through BIO-15 are required.</p> <p>Mitigation Measure BIO-16: Tree Protection. If it is determined that construction may impact oak trees protected by the County's Deciduous Oak Tree Protection and Regeneration Ordinance included in Appendix IX of Chapter 35 of the Santa Barbara County Code, the Project Applicant shall procure an Oak Tree Removal Permit, if required by Section 35-909 of the County's Deciduous Oak Tree Protection and Regeneration Ordinance. Should an Oak Tree Removal Permit be required, the Project Applicant shall be required to implement the following, in addition to all other requirements as described within the</p>	Less than Significant

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>County's Deciduous Oak Tree Protection Ordinance (Santa Barbara County 2003):</p> <ul style="list-style-type: none"> An Oak Tree Management Plan shall be developed by an oak tree specialist for the Project Site on which any oak tree removal will take place and any lot used for off-site replacement. The plan shall comply with the requirements included in Section 35-911 of the County Deciduous Oak Tree Protection and Regeneration Ordinance, as included in Article IX of Chapter 35 of the County Code. Oak trees that are removed shall be compensated at a 15:1 ratio by replacement planting, or protection of naturally occurring oak trees between six inches and six feet tall on the Project Site. Replacement trees shall be nurtured for five years. At the end of the five years, ten trees for every protected tree removed shall be alive, in good health as defined by the oak tree specialist, and capable of surviving without nurturing and protection. Valley oak tree removal over an area of five acres or greater shall require valley oak replanting of an area of comparable size in an area of existing or historic valley oak habitat. 	
<p>Impact 6: Implementation of the Project could conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p>No Impact</p>	<p>No mitigation measures are required</p>	<p>No Impact</p>
<p>Cultural Resources</p>			
<p>Impact 1: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure CR-1: Historical Resources Impact Minimization. Prior to individual permit issuance, the implementing agency of the Last-Mile Broadband Project shall prepare a map defining a proposed fiber optic cable alignment involving ground and aerial disturbance for fiberoptic cable. This map will help to determine whether known historical resources and/or potential historic districts are located within the proposed fiber optic cable alignment. If a structure greater than 45 years in age is within the identified proposed fiber optic cable alignment, study</p>	<p>Less than Significant</p>

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>recommendations shall be implemented, which may include, but would not be limited to, the following:</p> <ul style="list-style-type: none"> At the program level, realign or redesign projects to avoid impacts on known historic resources where possible. Project shall be designed in such a way that ground disturbance, and physical connections to the building will be minimally intrusive to historic resources. When possible, new fiberoptic cables should utilize existing mechanical housing to avoid visual intrusion at the property. New mechanical housing should be affixed to historic resources in such that will not damage or destroy historic fabric and will be minimally intrusive. At the program level, if avoidance of a significant architectural/built environment resource is not feasible, additional mitigation options include, but are not limited to, specific design plans for historic districts, or plans for alteration or adaptive re-use of a historical resource that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring and Reconstructing Historic Buildings. At the project level, if a structure and/or property greater than 45 years that has not yet been formally evaluated for historic significance is located within a proposed fiber optic cable alignment, a survey and historic resources evaluation of the structure and/or property would be conducted to determine eligibility for listing on State, federal, or local historic registers. The evaluation shall be prepared by a qualified architectural historian, or historical architect meeting the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation, Professional Qualification Standards. The evaluation shall comply with CEQA Guidelines section 15064.5(b). Structures and/or properties potentially eligible for significance as historic resources would follow the above guidance for program level avoidance and/or plan review to ensure that the proposed project is designed in such a way that it avoids potential impacts to historical resources. 	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<ul style="list-style-type: none"> Comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect historic resources. 	
<p>Impact 2: Implementation of the Proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure CR-2: Archaeological Resources Impact Minimization. The implementing agency shall retain a Qualified Archaeologist under the Secretary of the Interior Standards to carry out all mitigation related to archaeological resources as required for each project. Prior to the start of ground-disturbing activities, the Qualified Archaeologist or their designee shall conduct construction worker archaeological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of precontact and historic archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources, and safety precautions to be taken when working with archaeological monitors. The Implementing agency shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. In addition, a cultural resource impact mitigation program (CRIMP) shall be filed with the County prior to site grading. The CRIMP shall specify the steps to be taken to mitigate impacts to cultural resources and shall include all of the program area projects and be amended if necessary at a project level.</p> <p>The CRIMP will also outline protocols to follow for unanticipated discoveries. Impacts to known archaeological resources that are within or directly adjacent to project CEQA significance evaluation and mitigation for avoidance or when avoidance is not possible, controlled archaeological data recovery.</p> <p>Within the planned projects there are 10 archaeological sites which have been determined to be within or directly adjacent to known archaeological sites and two districts. All 12 sites and districts have been determined to be eligible, potentially eligible, or have not been evaluated. As such they need to be mitigated under CEQA with evaluation and data recovery once the alignments and various components of the known projects are planned. Project planning should include design to avoid these sites whenever possible. When avoidance is not possible, testing and data recovery</p>	<p>Less than Significant</p>

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>must be completed in advance of construction. The qualified Archaeologist shall coordinate with the implementing agency to develop a formal testing and data recovery plan which specifies all necessary notification and final reporting of the findings will be prepared and would serve to reduce impacts to the resources once the final design is available. To minimize disturbance to these sites, testing and data recovery should be planned within the planned alignment. For locations where directional boring will be conducted, data recovery should focus on entrance and exit pit locations.</p> <p>Mitigation Measure CR-3: The qualified Archaeologist shall oversee an archaeological monitor who shall be present during construction activities on the projects deemed by the qualified Archaeologist to have the potential for encountering archaeological resources, such as demolition, excavation of boring entrance and exist pits, clearing/grubbing, drilling/auguring, grading, trenching, excavation, or other ground disturbing activity associated with the project where the ground disturbance can be observed. The archaeological monitor shall have the authority to direct the pace of construction equipment activity in areas of higher sensitivity and to temporarily divert, redirect or halt ground disturbance activities to allow identification, evaluation, and potential recovery of archaeological resources in coordination with the qualified Archaeologist. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the qualified Archaeologist.</p> <p>In the event that historic-period (e.g., bottles, foundations, early infrastructure, refuse dumps/privies, railroads, etc.) or precontact (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 50-foot buffer shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work may continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by</p>	

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		<p>the qualified Archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the implementing agency to develop a formal treatment plan that would serve to reduce impacts to the resources. If any precontact archaeological sites are encountered within the Project area, consultation with consulting Native American tribes will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources.</p> <p>The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and shall be explored to see if project activities can avoid archaeological resources, such as: if the archaeological site can be deeded into a permanent conservation easement, if the resources can be capped with chemically stable soil or if the resource can be incorporated within open space.</p> <p>If, in coordination with the implementing agency, it is determined that preservation in place is not feasible, and in order to mitigate potential impacts to significant resources pursuant to Section 15064.5 of CEQA, data recovery is feasible. Appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the implementing agency and a data recovery plan shall be implemented. A data recovery plan will make provision for adequately recovering the scientifically consequential information from and about the historical resources. and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing, analysis, reporting, and commemoration in the form of signage or other public education and awareness. This process will be in accordance with and further outlined in the CRIMP.</p> <p>Precontact or tribal cultural resources will be offered to consulting tribes after analysis is complete to be</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>curated or reburied if the tribes wish to accept the material. Any archaeological material collected not returned to the tribes, shall be curated after analysis is complete, at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.</p> <p>Mitigation Measure CR-4: At the conclusion of the archaeological monitoring, the qualified Archaeologist shall prepare a technical report that follows the format and content guidelines provided in California Office of Historic Preservation’s Archaeological Resource Management Reports (ARMR). The technical report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. Appropriate California Department of Parks and Recreation Site Forms (Site Forms) shall also be prepared and provided in an appendix to the report. The technical report shall be prepared under the supervision of the qualified Archaeologist and submitted to the implementing agency within 150 days of completion of the monitoring. The final draft of the report shall be submitted to the CCIC.</p> <p>Mitigation Measure CR-5: Should any future projects be planned within the program area, or if any of the currently planned projects move location, the qualified archaeologist shall assess construction plans and geotechnical reports, as well as reviewing record search data (which should be updated every 2 to 3 years as applicable) and they or their designee shall survey the new project alignment as well as a buffer, for the Project to determine whether any archaeological sites could be impacted by the Project, and to make recommendations for testing and/or monitoring. The archaeologist will amend the CRIMP as appropriate and prepare a treatment plan as described in Mitigation Measure CR-2.</p>	

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<p>Impact 3: Implementation of the Proposed Project could potentially disturb human remains; and cause a significant impact.</p>	Potentially Significant	<p>Mitigation Measure CR-6: Inadvertent Discovery of Human Remains. If human skeletal remains are uncovered during ground disturbance the implementing agency shall immediately halt work, contact the Santa Barbara County coroner to determine whether the remains are human, and follow the procedures and protocols outlined in the CRIMP (see CUL-MM-1 through 5) and those set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, they shall contact the Native American Heritage Commission (NAHC), in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code Section (PRC) 5097.98 (as amended by AB 2641). The NAHC shall then identify the person(s) thought to be the Most Likely Descendant (MLD) of the deceased Native American, who will then help determine what course of action should be taken in dealing with the remains. Per PRC 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (PRC 5097.98), with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.</p>	Less than Significant
<p>Impact 4: Implementation of the Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature causing a significant impact.</p>	Potentially Significant	<p>Mitigation Measure PALEO-1: The Implementing agency shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for Qualified Professional Paleontologist (Qualified Paleontologist) to carry out all mitigation related to paleontological resources as required for each project. The Qualified Paleontologist will implement a paleontological monitoring program for construction excavations that would encounter the potentially fossiliferous Eocene-Pliocene marine units, the Pliocene-Pleistocene transitional units, and the older Pleistocene alluvium prior to the start of ground-disturbing activities, the Qualified Paleontologist or their designee shall conduct construction worker paleontological resources sensitivity training for all construction personnel. Construction personnel shall be informed on how to identify the types of</p>	Less than Significant

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The Implementing agency shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.</p> <p>Mitigation Measure PALEO-2: Paleontological monitoring shall be conducted as specified in the monitoring program developed per Mitigation Measure PALEO-1. Monitoring shall be conducted by a qualified paleontological monitor (SVP 2010) working under the direct supervision of the Qualified Paleontologist. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting sediment samples to wet or dry screen to test promising horizons for smaller fossil remains. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, the Qualified Paleontologist may recommend that monitoring be reduced to periodic spot-checking or cease entirely.</p> <p>Mitigation Measure PALEO-3: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at an accredited repository.</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 25-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described in this measure.</p> <p>Mitigation Measure PALEO-4: At the conclusion of paleontological monitoring, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and any salvage efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Qualified Paleontologist to the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the proposed project and required mitigation measures.</p> <p>Mitigation Measure PALEO-5: If fossils are found on a project/formation that does not require monitoring, the qualified paleontologist will be contacted for evaluation and recommendations for salvage. The paleontologist shall prepare a report summarizing the results of the monitoring program including methods of fossil recovery and curation, and a description of the fossils collected and their significance. A copy of the report shall be provided to the Implementing agency. The fossils and a copy of the report shall be deposited in an accredited curation facility such as the Los Angeles Natural History Museum.</p>	
Energy			
<p>Impact 1: Implementation of the Project could result in a potentially significant environmental impact if energy (electricity, natural gas, or transportation) used during construction or operation results in the wasteful, inefficient, or unnecessary consumption of energy resources.</p>	<p>Less than Significant</p>	<p>No mitigation measures are required</p>	<p>Less than Significant</p>

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
<p>Impact 2: Implementation of the Proposed Project could conflict with or obstruct a state or local plan for renewable energy or energy efficiency if during construction or operation the Project doesn't comply with applicable rules or regulations, resulting in a significant impact.</p>	Less than Significant	No mitigation measures are required	Less than Significant
Global Climate Change			
<p>Impact 1: Implementation of the Broadband Program could generate GHG emissions, directly or indirectly, that exceed the County of Santa Barbara or SBCAPCD screening thresholds or significance thresholds resulting in a significant impact on the environment.</p>	Less than Significant	No mitigation measures are required	Less than Significant
<p>Impact 2: Implementation of the Priority Area projects and future broadband projects could contribute to cumulative GHG impacts if it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.</p>	Less than Significant	No mitigation measures are required	Less than Significant
Noise and Vibration			
<p>Impact 1: Implementation of the Project, in combination with other development, would contribute to cumulative less than significant impacts in regards to construction and operational noise for past, present, and future development.</p>	Potentially Significant	<p>Mitigation Measure 4.6-1: The applicant, including all contractors and subcontractors, shall limit construction activity, including equipment maintenance and site preparation, to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday. No construction shall occur on weekends or State holidays.</p>	Less than Significant
<p>Impact 2: Implementation of the Proposed Project, in combination with other development, would contribute to cumulative less than significant impacts in regards to ground-vibration damage to structures and human annoyance from construction and operation of past, present, and future projects.</p>	Less than Significant	No mitigation measures are required	Less than Significant
<p>Impact 3: Implementation of the Proposed Project would not result in the Project being located within the vicinity of a private airstrip or airport land use plan. Therefore, the Airport operations would result in a less than significant impact.</p>	Less than Significant	No mitigation measures are required	Less than Significant

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Tribal Cultural Resources			
<p>Impact 1: The Project would not cause a substantial adverse change in the significance of a tribal cultural resource pursuant to PRC Section 21074.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure TCR-1: The implementing agency shall retain a Native American monitor from the Santa Ynez Band of Chumash Indians (Tribe) to carry out all mitigation related to tribal cultural resources as required for each project. Prior to the commencement of ground disturbing activities, a Tribal Cultural Resources Sensitivity Training session shall be held for those construction personnel who will be directly involved in the ground disturbing activities. The training session shall be carried out by the Native American Monitor and shall focus on how to identify tribal cultural resources that may be encountered during ground disturbing activities and the procedures to be followed in such an event.</p> <p>Within the planned projects there are 10 archaeological sites (which have been determined to be within or directly adjacent to known archaeological sites) and two districts. All 12 sites and districts have been determined to be eligible, potentially eligible, or have not been evaluated. Project planning should include design to avoid these sites whenever possible. When avoidance is not possible, testing and data recovery must be completed in advance of construction by a Qualified Archaeologist identified in Mitigation Measure CR-2. The Tribe shall provide a Native American monitor who shall be present during testing/data recovery, and construction activities on the projects deemed by the qualified Archaeologist and the consulting tribe to have the potential for encountering archaeological resources, that could be considered tribal cultural resources by the Tribe and under CEQA, such as demolition, excavation of boring entrance and exist pits, clearing/grubbing, drilling/auguring, grading, trenching, excavation, or other ground disturbing activity associated with the project where the ground disturbance can be observed. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined appropriate by the Qualified Archaeologist and the Tribe.</p>	<p>Less than Significant</p>

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>Mitigation Measure TCR-2: The Native American Monitor shall complete daily monitoring logs that provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered tribal cultural resources, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the implementing agency upon written request to the Tribe.</p> <p>Mitigation Measure TCR-3: In the event of a discovery of potential tribal cultural resources, the Qualified Archaeologist identified in Mitigation Measure CR-2 [after consultation with the Native American Monitor] shall have the authority to temporarily divert, redirect, or halt ground-disturbance activities to allow identification, evaluation, and potential recovery of such potential resources. After consulting with the Native American Monitor and the implementing agency, the Qualified Archaeologist shall establish an appropriate buffer area in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where ground-disturbing activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
		<p>Within three (3) business days of such discovery, a meeting shall take place between the Qualified Archaeologist, the Tribe, and the implementing agency to discuss the significance of the find and whether it qualifies as a tribal cultural resource pursuant to Public Resources Code Section 21074(a). If, as a result of the meeting and after consultation with the Tribe and the Qualified Archaeologist, the implementing agency determines, based on substantial evidence, that the resource is in fact a tribal cultural resource, the Qualified Archaeologist shall develop a reasonable and feasible treatment plan, with input from the Tribe as necessary, and with the concurrence of the implementing agency. The treatment measures in the treatment plan shall be in compliance with any applicable federal, State, or local laws, rules or regulations. The treatment plan shall also include measures regarding the curation of the recovered resources.</p> <p>The lead agency may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in the above paragraphs.</p> <p>The recovered tribal cultural resources may be placed in the custody of the Tribe, who may choose to use them for their educational purposes or they may be curated at a public, non-profit institution with a research interest in the materials. If neither the Tribe nor an institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.</p> <p>Notwithstanding the above paragraph, any information determined to be confidential in nature by the implementing agency, shall be excluded from submission to the CCIC or the general public under the applicable provisions of the California Public Records Act, Sections 7927.000 and 7929.005.</p>	

Environmental Impact Summary	Impact	Mitigation Measure(s)	Level of Significance After Mitigation
Utilities			
<p>Impact 1: Implementation of the Proposed Project would not result in relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, or natural gas facilities. The Proposed Project would result in less than significant impacts to expanded electric power or telecommunication facilities.</p>	Less than Significant	No mitigation measures are required	Less than Significant