

CHAPTER 5

Alternatives

5.1 Overview

The California Code of Regulations (CCR) Section 15126.6(a) (State CEQA Guidelines) requires EIRs to describe “... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a range of potentially feasible alternatives that will avoid or substantially lessen the significant adverse impacts of a project, and foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” This section of the State CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis is as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code [PRC] Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. If an alternative would cause one or more significant effects in addition to those that would be caused by the program as proposed, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the program as proposed (CCR Section 15126.6[d]).

The State CEQA Guidelines further require that the “no project” alternative be considered (CCR Section 15126.6[e]). The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving the proposed project. If the no project alternative is the environmentally superior alternative, CEQA requires that the EIR “...shall also identify an environmentally superior alternative among the other alternatives.” (CCR Section 15126.6[e][2]).

In defining “feasibility” (e.g., “... feasibly attain most of the basic objectives of the project ...”), CCR Section 15126.6(f)(1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project’s significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency’s decision-making body, Santa Barbara County (County) (See PRC Sections 21081.5, 21081[a][3].)

5.2 Factors in the Selection of Alternatives

The State CEQA Guidelines Section 15126.6(c) provides the following guidance in selecting a range of reasonable alternatives for the Project. The range of potential alternatives to the Project must include those that could feasibly accomplish most of the basic objectives of the Project and avoid or substantially lessen one or more of the significant effects of the Project. It is important to note, however, that this EIR did not identify any significant unavoidable impacts of the Project; all impacts are mitigable to less-than-significant levels. Therefore, discussions of a given alternative’s ability to reduce impacts should be considered in that context—certain impacts may be somewhat reduced by an alternative, but not from significant levels to less-than-significant levels.

5.2.1 Project Objectives

The objectives of the Project are to evaluate the reasonableness and feasibility of each alternative. As presented in Chapter 2, Project Description, the objectives of the Program are as follows:

1. Provide reliable high-speed broadband internet service to residents and businesses located in the identified Priority Areas and any additional unserved and underserved communities in Santa Barbara County in order to improve communication capabilities throughout the County;
2. Provide upgradable and expandable high-speed broadband capacity in the service areas with minimum speeds of 25 megabits per second (Mbps) for downloads and 5 Mbps for uploads, consistent with the federal definition of “adequate service” for broadband and California’s definition of broadband;
3. Enable an increase in telecommuting, telehealth services, and distance learning, with a commensurate decrease in vehicle miles traveled, barriers to medical provider access, and digital/educational inequities;
4. Provide broadband infrastructure to support the regional public safety network, including providing network redundancy and resiliency to improve disaster preparation and emergency response;

5. Identify and facilitate funding opportunities for future broadband infrastructure installations under the Program;
6. Reduce the potential environmental effects of broadband installation projects by utilizing minimally impactful construction techniques and equipment and avoiding construction within or near sensitive environmental resources to the extent feasible;
7. Provide a reliable foundation of data and acceptable methodology to assess impacts for future broadband deployment projects, and streamline the environmental review process for individual broadband projects that are implemented in both incorporated and unincorporated areas of Santa Barbara County; and
8. To implement resources most efficiently within the County, incorporated cities, and broadband project applicants. This will result in the overall reduction in the amount of County and member agency staff time required to review broadband projects and avoiding duplication of applicant costs.

5.2.2 Significant Effects of the Proposed Project

Sections 4.1 through 4.8 of this Draft EIR address the environmental impacts of implementation of the Project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the Project, as identified in Chapter 4 of this Draft EIR and summarized in Table ES-1 in the “Executive Summary” chapter. As described in Table ES-1 and Sections 4.1 through 4.8, for the following resource areas the Project could result in significant or potentially significant impacts that would be reduced to less-than-significant levels with the incorporation of mitigation:

- Air Quality;
- Biological Resources;
- Cultural Resources;
- Noise and Vibration; and
- Tribal Cultural Resources

No significant and unavoidable environmental impacts resulting from the program were identified.

5.3 Alternatives Considered but Dismissed from Further Evaluation

In accordance with CEQA Guidelines Section 15126.6(c), determining what alternatives should be addressed in the PEIR, the County considered alternatives that would involve expansion of Wifi/5G capabilities, and an alternative that would solely utilize existing infrastructure (conduit and utility poles), which would minimize construction impacts. These alternatives, described in more detail below, were determined to be infeasible and were rejected for further consideration in the PEIR.

5.3.1 Wifi/5G

This alternative would not install broadband infrastructure and would instead increase the wireless internet capacity and 5G capabilities within the underserved areas throughout the County. This alternative would involve providers of mobile networks expanding mobile services to areas that do not have access to broadband technology. The 5G capability is considered a mid-band technology and requires mid-band ranges in spectrum to allow data to travel long distances. This type of technology does not meet most of the project objectives as it does not focus on fiber optic broadband infrastructure installation, which is a more reliable technology and is not subject to disruption and interference to the extent that wireless technologies are. Therefore, this alternative is not selected for detailed analysis.

5.3.2 Use Existing Infrastructure Only

This alternative would include only projects that install fiber optic line in existing conduit or along existing utility poles, with no new conduit or utility pole installations proposed. This alternative was considered because it would reduce the extent of potentially significant impacts reduced to a less than significant level with mitigation associated with installation of new conduit and utility pole infrastructure. However, it would not meet most of the basic objectives of the program because it would not provide for the expansion of broadband infrastructure into portions of the service area that do not already include sufficient conduit, utility poles, and supporting infrastructure. Therefore, this alternative is not selected for detailed analysis.

5.4 Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), three feasible alternatives to the Project are evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. The evaluation of each of the alternatives follows the format described below:

- A description of the alternative.
- The environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental issue area analyzed in the EIR are described. Where applicable, the evaluation is divided between temporary impacts that would occur during the Project's construction phase and impacts that would occur during the Project's operational phase.
- Environmental impacts of the alternative and the Project are compared for each environmental issue area evaluated in Chapter 4, *Environmental Impacts and Mitigation Measures*, the Draft EIR. Where the impact of the alternative would be less adverse than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would be more adverse than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project, an impact would be entirely avoided, or whether a significant impact under the Project could be reduced to a less-than-significant level in the alternative.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives would be attained by the alternative.

At the end of the section, pursuant to CEQA Guidelines Section 15126.6(e)(2) an Environmentally Superior Alternative is identified. The comparative impacts of the Project and the alternatives are summarized in Table 5-1 below.

5.5 Alternatives Selected for Further Consideration

The following alternatives are evaluated in this Draft EIR:

- Alternative 1: No Project Alternative. This alternative assumes no additional broadband infrastructure would be installed and broadband capacity would be unchanged from existing conditions.
- Alternative 2: Reduced Area/Priority Areas Only Alternative
- Alternative 3: Existing Infrastructure Alternative

Further details on these alternatives, and an evaluation of environmental impacts relative to the Project are provided below.

5.5.1 Alternative 1: No Project Alternative

As required by CEQA, the No Project Alternative is evaluated in this Draft EIR. 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.

Air Quality

Under the No Project Alternative, no construction or operation of additional broadband infrastructure would occur. As a result, there would be no construction-related air emissions, and no air emissions would occur from operating new broadband infrastructure. Thus, there would be no impact to air quality. Thus, air quality impacts would be less under Alternative 1 than the Project.

Biological Resources

Because no construction, excavation, or ground disturbance would occur under the No Project Alternative, there would be no effects on biological resources. The No Project Alternative would not affect special-status species or habitat, USFWS-designated critical habitat for 14 species (arroyo toad, California condor, California red-legged frog, California tiger salamander, Gaviota tarplant, La Graciosa thistle, least Bell’s vireo, Lompoc yerba santa, southwestern willow flycatcher, tidewater goby, Vandenberg monkeyflower, Ventura marsh milk-vetch, vernal pool fairy shrimp, and western snowy plover), or riparian habitat or other sensitive natural communities. The No Project Alternative also would not degrade wetlands, interfere with wildlife movement corridors or nursery sites, or conflict with local ordinances or policies. For these reasons, the No Project Alternative would have no impact on biological resources. Thus, biological resources impacts would be less under the No Project Alternative than the Project.

Cultural Resources

No construction, excavation, or ground disturbance would occur under the No Project Alternative. Therefore, no effects on historic resources or unique archeological resources would occur. Since no construction would occur under the No Project Alternative, there would also be no risk of disturbing human remains. For these reasons, the No Project Alternative would have no impact on historical or archaeological resources. Thus, cultural resources impacts would be less under the No Project Alternative than the Project.

Energy

Under the No Project Alternative, no construction or operation of additional broadband infrastructure would occur. As a result, there would be no construction-related energy usage, and no operations of new broadband infrastructure would be built that would consume energy. Thus, there would be no impact to energy usage or supplies. Thus, energy impacts would be less under the No Project Alternative than the Project.

Greenhouse Gas Emissions and Global Climate Change

Under the No Project Alternative, no construction or operation of additional broadband infrastructure would occur. As a result, there would be no construction-related GHG emissions, and no GHG emissions would occur from operating new broadband infrastructure. Thus, there would be no impact to global climate change. Thus, GHG impacts would be less under the No Project Alternative than the Project.

Noise and Vibration

Under the No Project Alternative, no construction or operation of additional broadband infrastructure would occur. As a result, there would be no construction or operational noise. Thus, there would be no impact related to noise. Thus, noise and vibration impacts would be less under the No Project Alternative than the Project.

Tribal Cultural Resources

No construction, excavation, or ground disturbance would occur under the No Project Alternative. Therefore, there would be no impacts on tribal cultural resources. For these reasons, the No Project Alternative would have no impact on tribal cultural resources. Thus, tribal cultural resources impacts would be less under the No Project Alternative than the Project.

Utilities

Under the No Project Alternative, no expansion of broadband infrastructure would occur. As a result, no impact related to utilities would occur. Thus, utilities impacts would be less under the No Project Alternative than the Project.

Relationship to Project Objectives

As described above, 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. Thus, the No Project Alternative would not meet any of the nine Project objectives, which are listed above.

5.5.2 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 EIR), 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.

Air Quality

Under the Reduced Area/Priority Areas Only Alternative, less construction and operation of additional broadband infrastructure would occur. The Reduced Area/Priority Areas Only Alternative would implement the same construction-related mitigation measure regarding Valley Fever during construction activities as the Project, when needed. With a reduced scale of construction and operational activities, there would be less construction- and operational related air emissions from the new broadband infrastructure. Therefore, impacts related to air quality under the Reduced Area/Priority Areas Only Alternative would be less than the Project.

Biological Resources

Because less construction, excavation, and ground disturbance would occur under the Reduced Area/Priority Areas Only Alternative, there would be less effects on biological resources than the Project. Most of the USFWS-designated critical habitat for sensitive species is outside of the Priority areas, although there is critical habitat for California red-legged frog, La Graciosa thistle, Vandenberg monkeyflower, and California tiger salamander present within the Priority Areas. Nonetheless, without construction outside of the Priority areas, less impacts would occur to critical habitat under the Reduced Area/Priority Areas Only Alternative. Although the Project would focus construction along roadways and would be designed to generally avoid drainages/wetlands and sensitive habitats, it is possible that the construction of future broadband facilities could result in modification or conversion of sensitive natural communities and/or riparian habitat. Without construction outside of the Priority areas, less impacts to drainages/wetlands and sensitive habitats would occur under the Reduced Area/Priority Areas Only Alternative. Construction 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. Again, without construction outside of the Priority areas, less impacts to migratory species and wildlife corridors would occur under the Reduced Area/Priority Areas Only Alternative. The Reduced Area/Priority Areas Only Alternative would implement the same construction-related mitigation measure during construction activities as the Project,

when needed. In general, with a reduced scale of construction activities, there would be less construction-related impacts to biological resources from the new broadband infrastructure under the Reduced Area/Priority Areas Only Alternative.

Finally, both the Project and the Reduced Area/Priority Areas Only Alternative, could include the construction of future broadband facilities that could conflict with local policies for ordinances protecting biological resources. However, both would implement the same mitigation measures to avoid, reduce and minimize, and/or mitigate potential impacts to biological communities, and would be required to comply with local plans, policies, ordinances, and applicable permitting procedures related to the protection of biological resources. For this reason, the Reduced Area/Priority Areas Only Alternative's impacts regarding potential conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would be less than significant with mitigation and similar to the Project.

With regard to operational activities for any individual project implemented under the Project, there would be limited routine maintenance activities, with corresponding operational impacts being minimal and less than significant. The Reduced Area/Priority Areas Only Alternative would involve similar limited operational activities, and thus, operational impacts to biological resources would be less than significant and similar to the Project.

Overall, because of its less construction-related impacts, impacts related to biological resources under the Reduced Area/Priority Areas Only Alternative would be less than the Project.

Cultural Resources

The Reduced Area/Priority Areas Only Alternative would result in less construction, excavation, and ground disturbance than the Project because it would not involve broadband infrastructure outside of the Priority Areas. Construction activities as part of the Reduced Area/Priority Areas Only Alternative would implement the same mitigation measures as the Project resulting in a less than significant impact. However, impacts to historic resources, archaeological resources, and human remains would be less than the Project because the Reduced Area/Priority Areas Only Alternative would include fewer ground disturbing construction activities within a smaller program area.

Energy

Neither the Reduced Area/Priority Areas Only Area Alternative or the Project, would result in wasteful, inefficient, or unnecessary consumption of energy resources. Furthermore, neither would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, energy impacts under the Reduced Area/Priority Areas Only Alternative and the Project would be less than significant. However, under the Reduced Area/Priority Areas Only Alternative, less construction and operation activities associated with additional broadband infrastructure would occur. As a result, there would be less energy demand from the operation and maintenance of new broadband infrastructure under the Reduced Area/Priority Areas Only Alternative when compared to the Project. Therefore, impacts related to energy under the Reduced Area/Priority Areas Only Alternative would be less than the Project.

Greenhouse Gas Emissions and Global Climate Change

Neither the Reduced Area/Priority Areas Only Area Alternative nor the Project, would directly or indirectly, generate GHG emissions that exceed the County of Santa Barbara or SBCAPCD screening thresholds or significance thresholds resulting in a significant impact on the environment. Furthermore, neither would contribute to cumulative GHG impacts due to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, GHG impacts under the Reduced Area/Priority Areas Only Alternative and the Project would be less than significant. However, under the Reduced Area/Priority Areas Only Alternative, less construction and operation activities associated with additional broadband infrastructure would occur. As a result, there would be less construction-related GHG emissions and GHG emissions from the operation and maintenance of new broadband infrastructure under the Reduced Area/Priority Areas Only Alternative when compared to the Project. Therefore, impacts related to GHG emissions and climate change under the Reduced Area/Priority Areas Only Alternative would be less than the Project.

Noise and Vibration

Under the Reduced Area/Priority Areas Only Alternative and the Project, the same construction methods would be used and the same mitigation measures would be implemented, resulting in less than significant construction-related noise impacts after mitigation at sites near sensitive noise receptors. Operation of either the Project or the Reduced Area/Priority Areas Only Alternative would include minimal routine maintenance activities with resulting less than significant and similar noise impacts. However, there would be less construction and operational activities of broadband infrastructure under the Reduced Area/Priority Areas Only Alternative when compared to the Project. Because less construction and operational activities associated with additional broadband infrastructure would occur under the Reduced Area/Priority Areas Only Alternative, there would be less impacts related to noise when compared to the Project.

Tribal Cultural Resources

The Reduced Area/Priority Areas Only Alternative would result in less construction, excavation, and ground disturbance than the Project because it would not involve broadband infrastructure outside of the Priority Areas. Construction activities as part of the Reduced Area/Priority Areas Only Alternative would implement the same mitigation measures as the Project resulting in a less than significant impact. However, impacts to tribal cultural resources would be less than the Project because the Reduced Area/Priority Areas Only Alternative would include fewer construction activities within a smaller program area.

Utilities

Under the Reduced Area/Priority Areas Only Alternative, less construction and operation of additional broadband infrastructure would occur. The Reduced Area/Priority Areas Only Alternative would implement the same construction-related mitigation measures (non-utility mitigation measures) during construction activities as the Project, when needed. With a reduced scale of construction and operational activities under the Reduced Area/Priority Areas Only Alternative, there would be less construction- and operational related impacts from the new broadband infrastructure. Therefore, impacts related to utilities under the Reduced Area/Priority Areas Only Alternative would be less than the Project.

Relationship to Project Objectives

The Reduced Area/Priority Areas Only Alternative would not provide expanded broadband infrastructure outside of the Priority Areas. As such, it would only partially meet Project Objective 1 since it would not provide high-speed broadband internet service to residents and businesses within additional unserved and underserved communities in Santa Barbara County in order to improve communication capabilities throughout the County. The Reduced Area/Priority Areas Only Alternative would also achieve Project Objectives 2 to 4 by providing the Priority Areas with new broadband infrastructure, but to a lesser extent such infrastructure would be made available in a smaller program area. Despite its smaller service, the Reduced Area/Priority Areas Only Alternative and the Project would both similarly identify and facilitate funding opportunities for future broadband infrastructure installations under the Program (Project Objective No. 5). For any given infrastructure improvement, both the Reduced Area/Priority Areas Only Alternative and the Project would similarly seek to reduce the potential environmental effects of broadband installation projects by utilizing minimally impactful construction techniques and equipment and avoiding construction within or near sensitive environmental resources to the extent feasible (Project Objective No. 6). Finally, both the Reduced Area/Priority Areas Only Alternative and the Project would similarly provide a reliable foundation of data and acceptable methodology to assess impacts for future broadband deployment projects, and streamline the environmental review process for individual broadband projects (Project Objective No. 7) and allocate resources to efficiently process broadband projects and avoiding duplication of applicant costs (Project Objective No. 8).

5.5.3 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 EIR), 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.

Air Quality

Under the Existing Infrastructure Alternative, less construction of new broadband infrastructure would occur, including less excavation, drilling, and installation of new underground conduit. The Existing Infrastructure Alternative would implement the same construction-related mitigation measure regarding Valley Fever during construction activities as the Project, when needed. With a reduced scale of ground-disturbing construction, there would be less construction-related air emissions from the new broadband infrastructure. With regard to operational activities for any individual project implemented under the Project, there would be limited routine maintenance activities, with corresponding operational impacts

being minimal and less than significant. As the Existing Infrastructure Alternative would involve similar limited operational activities as the Project, operational impacts related to air quality would be similar to the Project.

Overall, because of its less construction-related impacts, impacts related to air quality under the Existing Infrastructure Alternative would be less than the Project.

Biological Resources

Because less ground disturbing construction and excavation would occur under the Existing Infrastructure Alternative, there would be less effects on biological resources than the Project. Although the Project would focus construction along roadways and would be designed to generally avoid drainages/wetlands and sensitive habitats, it is possible that the construction of future broadband facilities could result in modification or conversion of sensitive natural communities and/or riparian habitat. By limiting ground disturbing infrastructure improvements, less impacts to drainages/wetlands and sensitive habitats would occur under the Existing Infrastructure Alternative. Construction 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. By limiting the amount of ground disturbance and vegetation disturbance or removal that could support wildlife movement, less impacts to migratory species and wildlife corridors would occur under the Existing Infrastructure Alternative. The Existing Infrastructure Alternative would implement the same construction-related mitigation measure during construction activities as the Project, when needed. In general, with a reduced scale of ground disturbing construction activities, there would be less construction-related impacts to biological resources from the new broadband infrastructure under the Existing Infrastructure Alternative.

Finally, both the Project and the Existing Infrastructure Alternative, could include the construction of future broadband facilities that could conflict with local policies or ordinances protecting biological resources. However, both would implement the same mitigation measures to avoid, reduce and minimize, and/or mitigate potential impacts to biological communities, and would be required to comply with local plans, policies, ordinances, and applicable permitting procedures related to the protection of biological resources. For this reason, the Existing Infrastructure Alternative's impacts regarding potential conflicts with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would be less than significant with mitigation and similar to the Project.

With regard to operational activities for any individual project implemented under the Project, there would be limited routine maintenance activities, with corresponding operational impacts being minimal and less than significant. The Existing Infrastructure Alternative would involve similar limited operational activities, and thus, operational impacts to biological resources would be less than significant and similar to the Project.

Overall, because of its less construction-related impacts, impacts related to biological resources under the Existing Infrastructure Alternative would be less than the Project.

Cultural Resources

The Existing Infrastructure Alternative would result in less in-ground construction and excavation than the Project because it would involve less new underground infrastructure. Construction activities as part of the Existing Infrastructure Alternative would implement the same mitigation measures as the Project resulting in a less than significant impact. However, impacts to historic resources, archaeological resources, and human remains would be less than the Project because the Existing Infrastructure Alternative would include fewer ground disturbing construction activities within a smaller program area.

Energy

Neither the Existing Infrastructure Alternative nor the Project, would result in wasteful, inefficient, or unnecessary consumption of energy resources. Furthermore, neither would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, energy impacts under the Existing Infrastructure Alternative and the Project would be less than significant. However, there would likely be less energy demand during construction activities as larger construction equipment for excavation/trenching would not be required in some individual infrastructure installation projects. The long-term energy demand from the operation and maintenance of new broadband infrastructure would be generally similar under the Existing Infrastructure Alternative when compared to the Project.

Overall, because of its less construction-related impacts, impacts related to energy under the Existing Infrastructure Alternative would be less than the Project.

Greenhouse Gas Emissions and Global Climate Change

Neither the Existing Infrastructure Alternative nor the Project, would directly or indirectly, generate GHG emissions that exceed the County of Santa Barbara or SBCAPCD screening thresholds or significance thresholds resulting in a significant impact on the environment. Furthermore, neither would contribute to cumulative GHG impacts due to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As such, GHG impacts under the Existing Infrastructure Alternative and the Project would be less than significant. However, under the Existing Infrastructure Alternative, less construction activities associated with additional broadband infrastructure would occur. As a result, there would be less construction-related GHG emissions from the installation of new broadband infrastructure under the Existing Infrastructure Alternative when compared to the Project. With regard to operational activities for any individual project implemented under the Project, there would be limited routine maintenance activities, with corresponding operational impacts being minimal and less than significant. As the Existing Infrastructure Alternative would involve similar limited operational activities as the Project, operational impacts related to GHG emissions would be similar to the Project.

Overall, because of its less construction-related impacts, impacts related to GHG emissions under the Existing Infrastructure Alternative would be less than the Project.

Noise and Vibration

Under the Existing Infrastructure Alternative and the Project, the same construction methods would be used and the same mitigation measures would be implemented, resulting in less than significant construction-related noise impacts after mitigation at sites near sensitive noise receptors. While there would be less in-ground activities under the Existing Infrastructure Alternative when compared to the Project, the resulting mitigated noise levels from these activities would not generate substantially greater noise levels than allowed by existing applicable noise regulations. Compared to the Project's construction activities, the resulting noise levels at sensitive receptors would be incrementally less for most individual infrastructure improvement projects where in-ground construction would occur. Operation of either the Project or the Existing Infrastructure Alternative would include minimal routine maintenance activities with resulting less than significant and similar noise impacts.

Overall, because of its less construction-related impacts, noise impacts under the Existing Infrastructure Alternative would be less than the Project.

Tribal Cultural Resources

The Existing Infrastructure Alternative would result in less in-ground construction and excavation than the Project because it would involve less new underground infrastructure. Construction activities as part of the Existing Infrastructure Alternative would implement the same mitigation measures as the Project resulting in a less than significant impact. However, impacts to tribal cultural resources would be less than the Project because the Existing Infrastructure Alternative would include fewer ground disturbing construction activities than the Project.

Utilities

Under the Existing Infrastructure Alternative, less construction activities would occur when compared to the Project, while operational activities would generally be similar. The Existing Infrastructure Alternative would implement the same construction-related mitigation measures (non-utility mitigation measures) during construction activities as the Project, when needed. With a reduced scale of construction, there would be less construction-related impacts from the new broadband infrastructure. Therefore, impacts related to utilities under the Existing Infrastructure Alternative would be less than the Project.

Relationship to Project Objectives

The Existing Infrastructure Alternative would result in the same long-term expanded broadband capabilities and infrastructure as the Project. As such, it would Project Objective Nos. 1-5, 7 and 8 to a similar extent as the Project. However, with regard to Project Objective No. 6, the Existing Infrastructure Alternative would result in less ground disturbing construction and as such, for any given infrastructure improvement, both the Existing Infrastructure Alternative would reduce the potential environmental effects during construction activities with less impactful construction techniques when compared to the Project, although all of the resulting construction impacts would be less significant after mitigation similar to the Project.

5.6 Environmentally Superior Alternative

Because the No Project Alternative (described above in Section 5.4.1) 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 above in Section 5.2.1.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As illustrated in 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.

As described above, 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.

**TABLE 5-1
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT**

Use or Feature	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Reduce Area/Priority Areas Only Alternative	Alternative 3: Existing Infrastructure Alternative
Air Quality	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Biological Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Cultural Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Energy	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Greenhouse Gas Emissions and Global Climate Change	Less than Significant	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Noise and Vibration	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Tribal Cultural Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Utilities	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)

SOURCE: ESA. 2024

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