

CHAPTER 6

Other CEQA Considerations

6.1 Introduction

This section discusses significant and unavoidable impacts, irreversible environmental impacts, and growth-inducing impacts that would be caused from implementation of the Broadband Program.

6.2 Significant and Unavoidable Adverse Impacts

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, including those that can be mitigated with feasible mitigation measures but not reduced to a less-than-significant level. The environmental effects of the proposed project on various aspects of the environment are discussed in detail in Chapter 4, *Environmental Impacts and Mitigation Measures*, of this Draft PEIR. Both Project-specific (in the Priority Areas and County-wide) and cumulative impacts are discussed. The analysis concludes that the proposed Project would not result in significant unavoidable impacts, either at the project-level or cumulatively.

6.3 Significant and Irreversible Environmental Changes

Under CEQA, an EIR must analyze the extent to which a project's primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage (State CEQA Guidelines section 15126.2(c); 15127). Section 15126.2(c) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or

- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

The proposed Broadband Program would result in the installation of fiber optic lines throughout the County to provide acceptable levels of service to unserved and underserved communities. Once installed, the fiber optic networks would operate passively, and would not have any material effect on land use or the potential for future development in the surrounding area. As such, implementation of the Project would not have any potential to generally commit future generations to any particular type of land use or development pattern.

The individual fiber projects implemented under the Project would result in the irreversible and irretrievable commitment of energy and materials during construction and operation. Energy would be expended in the form of electricity, gasoline, diesel fuel, and oil for equipment and vehicles that would be needed for Project construction, but to a much lesser extent, for operation and maintenance activities. Materials used during fiber optic line installation could include rocks, wood, concrete, and steel. The use of these nonrenewable resources would account for a minimal portion of the region's resources and would not affect the availability of these resources for other needs within the region. Construction contractors for individual fiber projects would use best available engineering techniques, construction and design practices, and equipment operating procedures. Moreover, the overall Project would not require new, permanent dedicated staff in comparison to existing conditions, which would not contribute to a considerable increase in vehicle trips in the region. Therefore, implementing the Project would not result in inefficient use of energy.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with either of the proposed projects. While the proposed projects could result in the limited use, transport, storage, and disposal of hazardous wastes during construction, all activities would comply with applicable state and federal laws related to hazardous materials, which significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage. Ongoing operation of the proposed broadband facilities would occur passively, and would not require the use, transport, storage, or disposal of hazardous materials or wastes.

Implementation of the Project would result in the long-term commitment of resources to urban development. The most notable significant irreversible impacts are increased generation of pollutants from vehicle travel and stationary operations, and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as water resources during construction activities. The unavoidable consequences of the proposed project are described in the appropriate sections in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures, for both the Priority Areas and future County-wide projects.

Resources that would be permanently and potentially continually consumed by implementation of each of the proposed broadband installation projects include water, electricity, natural gas, and fossil fuels (either directly during construction activities or indirectly during long-term operation); however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. With respect to operational activities, the long-term operation of the broadband facilities, including any necessary maintenance activities, would occur passively in general with only incidental site visits for inspections, vegetation management, additional connections, and other as-needed activities.

Collectively, the construction activities and limited operational activities related to each of the proposed broadband installation projects would result in the irretrievable commitment of relatively limited amounts of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

Over the past decade our understanding of global climate change and the role that communities can play in addressing it has grown significantly. There is scientific consensus that recent increases in global temperatures are associated with corresponding increases of greenhouse gases (GHGs). This temperature increase is beginning to affect regional climates and is expected result in impacts to our region and the world. Climate change has profound implications for the availability of the natural resources on which economic prosperity and human development depend. Because climate change is inherently a cumulative effect, the relative contribution from the proposed project to global warming is not currently possible to determine. This issue is discussed in Section 4.5, *Global Climate Change*, of this Draft PEIR.

6.4 Growth-Inducing Effects

California Environmental Quality Act (CEQA) Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an environmental impact report (EIR). Section 15126.2(d) of the State CEQA Guidelines provides the following guidance for assessing growth-inducing impacts of a project. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. The purpose of this section is to evaluate the potential growth-inducing effects resulting from the implementation of the proposed broadband installations in the identified Priority Areas and other yet-to-be identified unserved and underserved communities throughout the County.

A project can induce growth directly, indirectly, or both directly and indirectly. Direct growth inducement would result if a project involved construction of new housing. In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service; the provision of new physical or transportation access to an area; a change in zoning or general plan amendment approval); or economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion). These circumstances are further described below:

- **Elimination of Obstacles to Growth:** This refers to the extent to which a proposed project removes infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval.
- **Economic Effects:** This refers to the extent to which a proposed project could cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The multiplier effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The multiplier effect acknowledges that the onsite employment and population growth of each project is not the complete picture of growth caused by the project.

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

The effect of the proposed Project and other telecommunication projects on growth-inducing impacts is difficult to distinguish from other factors that cause people to move to an area. The availability of high-speed, high-volume communications is one factor among many in the decision by people and businesses to move to an area. The proposed Project would not create a significant number of jobs, promote the construction of homes, or remove any obstacle that impedes growth in Santa Barbara County. However, the Santa Barbara County Broadband Program would not directly induce growth for the following reasons:

- As described in Chapter 2, “Project Description,” Project implementation (i.e., construction of individual projects in Priority Areas as well as throughout the County) is expected to occur over many years, with 1 mile of underground fiber optic conduit construction taking approximately 18-20 days to install the conduit in a trench and 10 days to install the conduit via bore. An average of 3 to 5 construction workers would be anticipated at each individual fiber optic Project site for the duration of construction and it is assumed that up to 5 individual projects could be implemented concurrently. Operation and maintenance of the on-site and off-site facilities would be fulfilled by existing employees of the broadband providers. The Project would not generate a sufficient number of jobs, either temporarily during construction or during operation and maintenance, to attract appreciable economic or population growth to Santa Barbara County. In addition, the unemployment rate for Santa Barbara County (4.7 percent in December 2023 and 4.2 percent as of May 2024¹) suggests an available labor pool for construction of the proposed Project.
- The proposed Project would not involve the construction of any new residential units that could bring new residents to Santa Barbara County.
- Operation of the proposed Project would provide and expand the availability of high-speed internet access to existing rural residents, businesses, and schools in Santa Barbara County. Implementation of the last-mile projects would be expected to contribute to the retention of existing residents and businesses, which could indirectly contribute to a limited amount of future growth. The introduction of improved internet access would not be expected to create an influx of residents or businesses; thus, the proposed Project would not likely result in removal of a substantial obstacle that impedes growth in Santa Barbara County.

6.4.1 Elimination of Obstacles to Growth

The elimination of physical obstacles to growth is considered a growth-inducing effect. Growth within the County as a whole is affected by the capacity of utility systems serving the County and incorporated cities including the wastewater and drainage, water supply, and electrical systems. Growth within the County is also affected by the roadway circulation system, public transit infrastructure and services and bikeway/pedestrian facilities. The proposed Project would provide high-speed internet service to existing

¹ Bureau of Labor Statistics. Economy at a Glance - Santa Barbara – Santa Maria – Goleta, CA. Accessed June 26, 2024 at https://www.bls.gov/eag/eag.ca_santabarbara_msa.htm

underserved and unserved communities in the County, and would not eliminate obstacles to growth or otherwise foster additional growth, whether unplanned or otherwise, in the County.

6.4.2 Economic Effects

The Project would provide additional high-speed internet service and infrastructure to serve existing County residents and businesses, which could enhance the ability of residents to find additional or improved employment opportunities through remote work options, as well as improve the potential for internet-based commercial activities for businesses. The provision of high-quality broadband internet services in these areas would likely result in increased employment opportunities and enhanced online retail and service revenue potential, which would offer a financial benefit the established communities served by the Project, but would not be expected to trigger substantial growth and associated physical environmental effects.

6.4.3 Environmental Effects of Induced Growth

While economic and employment growth in the County is one potential indirect but intended consequence of the proposed Project, growth induced directly and indirectly by the Project could also affect the greater Central Coast region. Potential effects caused by induced growth in the region could include: increased traffic congestion; increased air pollutant emissions; loss of agricultural land and open space; loss of habitat and associated flora and fauna; increased demand on public utilities and services, such as fire and police protection, water, recycled water, wastewater, solid waste, energy, and natural gas; and increased demand for housing.

While the Project could contribute to indirect induced growth in the region through improved employment options for residents and potentially increased internet-based commercial activity, it is not anticipated that growth induced by the Project would be of sufficient size to substantially increase demand for development in the region, to the extent that such demand would lead to significant environmental effects. For these reasons, this impact would be considered less than significant.

6.5 Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. The analysis of Project impacts in Chapter IV, Environmental Impact Analysis, of this Draft EIR resulted in recommended mitigation measures for several environmental topics, including Air Quality, Biological Resources, Cultural Resources (including Paleontological Resources), Noise, and Tribal Cultural Resources. Air Quality measures include dust suppression and worker protection for Valley Fever, to limit exposure to spores by watering exposed soil and provided personal protective equipment (PPE) for construction staff. Biological Resources measures involve various site surveys by qualified biologists, construction worker training, monitoring of construction activities, invasive plant control (herbicides and physical removal), site revegetation with native species, jurisdictional delineations to identify the presence of wetlands and other sensitive natural communities, implementation of construction Best Management Practices (BMPs), and avoidance of sensitive resources. Cultural Resources and Tribal Cultural Resources mitigation consists primarily of monitoring of ground-disturbing and excavation

activities in sensitive areas, construction worker training, protocols for treatment of discovered resources, additional site investigations and report preparation. Noise mitigation requires compliance with applicable construction hours for work within the various jurisdictions in the County. While implementation of a limited number of the identified mitigation measures would result in temporary physical effects within the various broadband installation sites, none of the measures would have the potential to result in significant adverse effects on the environment, as the activities associated with these measures are limited in scale and intensity and are intended to minimize or avoid the adverse effects of the Project itself in discrete locations. Overall, implementation of the various mitigation measures for the Project would not itself result in any substantial adverse environmental effects, and therefore such secondary impacts would be less than significant.

6.6 Effects Found Not to Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft PEIR. Pursuant to Section 15128, such a statement may be contained in an attached copy of an Initial Study.

The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft PEIR. The Initial Study determined that the Project would not result in potentially significant impacts related to Aesthetics, Agriculture and Forestry Resources, Geology and Soils (except Paleontological Resources); Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Population and Housing; Public Services; Recreation; Transportation; Utilities and Service Systems (water supply, wastewater treatment capacity, and solid waste); and Wildfire.