

Appendix A -- No. 14

**PROPONENT'S ENVIRONMENTAL ASSESSMENT
ENVIRONMENTAL CHECKLIST**

Site name: Santa Barbara ILA

**Prepared for
California Public Utilities Commission**

**Prepared by
Level 3 Communications, LLC**

Table of Contents

	<u>Page</u>
Environmental Checklist.....	1
Analysis Team	37
Sources.....	39

Tables, Figures, Photo Plates, and Attachment are located at the back of this report

Tables

Table 1	Current and Potential Cumulative Projects in the Vicinity of the Santa Barbara ILA.
Table 2	Specific Local Policies Applicable to Each Issue Area for the Santa Barbara ILA Site.
Table 3	Santa Barbara ILA - Construction and Operation Emissions Summary.
Table 4	Santa Barbara County APCD - Total Project Construction Emissions.
Table 5	Potential for Habitat at the Santa Barbara ILA Site to Support Sensitive Species Occurring in the Vicinity.

Figures

Figure 1	Regional Map
Figure 2	Vicinity Map
Figure 3	Parcel Map
Figure 4	U.S.G.S. Quad Sheet
Figure 5	Surrounding Land Use Map
Figure 6	Photo Key Map
Figure 7	Conceptual Plot Plan
Figure 8	Noise Receptor Map
Figure 9	Floodplain Map
Figure 10	Wetlands Inventory Map

Photo Plates

Photo A	West Face (Front) of Building
Photo B	West Face (Front) of Building and Alley Adjacent to Railroad with Access to Anacapa Street
Photo C	View of South Face of Building and Railroad Access to Anacapa Street
Photo D	View of Helena Avenue Looking Northwest

Attachment

Attachment A Methodologies, Algorithms, and Assumptions Used in the Air and Noise Analysis.

ENVIRONMENTAL CHECKLIST

1. Facility Title:

Level 3 Long-Haul Network, Santa Barbara ILA

2. Lead Agency Name and Address:

California Public Utilities Commission
Van Ness Avenue, San Francisco, CA 94102
(415) 703-2782

3. Contact Person and Phone Number:

Bill Vander Lyn, Level 3 Communications, LLC
6689 Owens Drive, Suite A, Pleasanton, CA 94588
(925) 398-3040

4. Facility Location:

The project site is located at 122 Helena Avenue in the City of Santa Barbara, Santa Barbara County, California. It is an irregularly-shaped lot, approximately 17,000 square foot site with an existing approximately 15,900 square foot warehouse. The project site fronts on Helena Avenue to the west and has loading facilities at the east end of the building along Anacapa Street. The site is adjacent to the railroad right-of-way (ROW), with a narrow alley running along the southern property line between the building and the ROW. A small parking area is located at the front of the building along Helena Avenue. A portion of the Railroad ROW adjacent to the project is also used for parking (See Figure 1, Regional Map; Figure 2, Vicinity Map; Figure 3, Parcel Map; Figure 4, U.S.G.S. Quad Map; Figure 5, Surrounding Land Use Map; and Figure 6, Photo Key Map and referenced photos).

5. Proponent's Name and Address:

Level 3 Communications, LLC ("Level 3")
1450 Infinite Drive, Louisville, CO 80027
(303) 926-3000

6. General Plan Designation: Hotel/Retail/Commercial (HRC)

7. Zoning: HRC-2 (Hotel and Related Commerce – 2)/S-D-3 (Coastal Zone)

8. Description of Facility:

This checklist evaluates the design, construction, and operation of the Santa Barbara ILA. This facility, which will support the Long-Haul network, will be located outside a utility corridor.

The Santa Barbara In-line Amplification Facility (ILA) will be constructed within an existing building located on a developed 0.39-acre site at 122 Helena Avenue. An existing building encompasses 15,900 square feet of the parcel. The building shell will remain intact with the new electronics installed within. An elevated generator structure will be constructed at the southeast corner of this property adjacent to the building.

An ILA station is required to receive signals and amplify the light power that comes into it before transmitting the signal along the fiber optic cable. Signal amplification capabilities are required approximately every 60 miles or less along the network.

The proposed ILA station will be engineered for the utilization of the available square footage. No pre-fabricated ILA huts will be used at this location.

One 300-kilowatt, 449-horsepower (hp) diesel-powered generator will provide emergency power to the

building. The separate pre-cast concrete generator housing or shelter will be approximately 12 feet wide, 24 feet long (288 square feet), and 10 feet high. It will arrive pre-fabricated and will be installed on an improved concrete foundation. Insulation will be provided as needed for noise abatement. The generator will be mounted on a 1,000-gallon, double-walled, aboveground storage tank that is 13 feet long by 8 feet wide by 1 foot 9 inches high. The double-walled storage tank on which the engine/generator set is mounted is designed to support the weight of the engine/generator set and this mounting is a common design for emergency engine/generators. For engine/generator sets that are operated more frequently, the fuel tank is mounted separate from the engine/generator since greater fuel storage capability is required and the storage tank would be too large to be located beneath the engine/generator (Rice, 1999). The tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote).

All structures will arrive pre-assembled. No additional buildings will be constructed. Control and maintenance functions will occur within the proposed facilities. Parking spaces exist in front of the building facing Helena Avenue to support site maintenance activities.

The Santa Barbara ILA will require electricity and telephone. Utility lines supporting these capabilities are present. Normal electrical power will be provided, consisting of 400-amp, 480-volt, three-phase service. Existing water or sewer hookups will be retained. However, the site will be unmanned. Site grading is not anticipated nor will there be any net change in impervious surfaces. Thus, no changes in storm water drainage characteristics are anticipated. Fire protection equipment will be installed per local codes.

Figure 7 is a conceptual plot plan of the Santa Barbara ILA site showing required setbacks and locations of utility and vehicle access. The area bounded by the setbacks is the "development window" within which the present building is situated. The precise location of the ILA interior electronics will be determined during the engineering design phase of the project.

A concrete slab footing, of sufficient size will be excavated to enable a generator and its fuel supply to be elevated above the 100-year floodplain. Upgrading of the generator foundation will be engineered and completed prior to delivery of prefabricated components (i.e., shelter placement), placement of the fiber optic cable line, and installation of utility connections.

The fiber optic cable feed to the ILA will be from the (ROW) along the south side of the site. The connection to the ILA facility will be installed at a depth of approximately 42 inches either by plowing in the conduit (which does not require a trench) or by digging a trench, laying the conduit, and back-filling. The estimated volume of demolition debris requiring disposal is 120 cubic yards. During construction, no offsite areas will be required for mobilization or parking of construction or worker vehicles.

During operation at 100-percent load, the 449-hp generator consumes approximately 22 gallons of diesel fuel per hour (gph). At 75 percent load, fuel consumption rate is 16.5 gph. During most of the 30 minutes of testing and maintenance run time each week, the generators will run at 50-percent load. However, for the purpose of this "worst-case" calculation, Level 3 assumes a 75-percent load and 30 hours of run time each year (i.e., 1/2-hour/week times 52 weeks, plus four hours contingency). Therefore, 30 hours per year multiplied by 16.5 gph equals 495 gallons of diesel fuel consumption per year for testing and maintenance. Testing of the emergency generator will be controlled remotely, and will not be part of site maintenance activities.

Level 3 will equip each generator with a spill tray beneath the filling port and a spill emergency response kit. The kit will consist of a 55-gallon drum containing oil-absorbing booms and pads, tarps, duct tape, and shovels. These materials will be placed near the filling port for immediate access should a release occur. A laminated placard listing the number of an emergency response contractor and appropriate spill-reporting procedures will be contained in the drum and will also be displayed near

the filling port. Should a release occur that Level 3 personnel could not manage, the emergency response contractor will be called.

In line with its commitment to environmental compliance, Level 3 will train technical staff regarding safety and spill-response procedures that should be implemented during diesel fuel deliveries. These written procedures will define the necessary steps for use and disposal of spill containment equipment located at the site. A Level 3 technician will accompany any third party contractor delivering fuel. Because the facilities are kept locked, the Level 3 technician will unlock/lock the security gate during ingress and egress. The technician will advise the contractor as to the location of the filling port for the fuel tank, describe the site safety requirements, observe the fueling process, and listen for the high fuel alarm. Should a release occur, the Level 3 technician will immediately initiate containment and cleanup procedures.

The ILA site will not be permanently staffed. Each will be visited approximately once a week for routine maintenance, data downloading, and fuel tank filling (assumed for analysis purposes to be 60 trips per year).

Current and potential cumulative projects in the vicinity of the proposed Santa Barbara ILA site are provided in Table 1. Criteria for inclusion of a project in Table 1 are as follows:

- Projects are within two miles of the site. In some cases these projects are in more than one jurisdiction;
- Projects are scheduled for construction from one year before to one year after the "construction window" for the Level 3 facilities, or between March 1999 to March 2003;
- Current projects include those which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified; and
- Potential projects are those that have been formally submitted to the lead agency and which are defined well enough to discern where they are, what they are (type of land use), and how big they are (acres, dwelling units, square footage, etc.). Although these submitted, but not approved projects are considered "speculative" under CEQA, they give an indication of potential future development around the facility site.

9. Surrounding Land Uses and Environmental Setting:

The surrounding vicinity is characterized by commercial and industrial development and is densely developed. Adjacent uses to the north are a warehouse and a restaurant. To the south, across the railroad ROW, are industrial uses, including a large warehouse building and an equipment rental yard. To the east, across Anacapa Street are industrial land uses. To the west, across Helena Street are industrial and commercial uses, including warehouses and retail stores (See Figure 5, Surrounding Land Use Map).

10. Other Agencies Whose Approval is Required:

The site is located within the jurisdiction of the City of Santa Barbara. The City of Santa Barbara has indicated that the land use permitting process for this site is unclear (Henon 1999). It is possible that the proposed project would be prohibited on the proposed site because of its inconsistency with existing zoning. It is also possible that the proposed project could be allowed under the provision in the City of Santa Barbara Zoning Ordinance which allows the changing of a non-conforming use to another non-conforming use, either through an administrative permitting process, or a discretionary Conditional Use Permit. A discretionary Coastal Development Permit, approved by the City's Local Coastal Commission, would be required for development of the proposed project.

Specific local policies relevant to each of the sixteen environmental impact issue areas are provided in Table 2. When there are no relevant and applicable policies, this fact is stated with an explanation. Sources for the policies are provided at the end of the listing.

PROPONENT'S DETERMINATION

On the basis of this initial assessment, the proposed facility would not have a significant effect on the environment because the Environmental Commitments described below would be incorporated into the design and construction of the facility. A Negative Declaration would apply to this facility.

Environmental Commitments

The proposed facility is an element of the project addressed in an Application for Modification for an existing Certificate of Public Convenience and Necessity (CPCN) (Decision No. 98-03-066). That CPCN was supported by a Mitigated Negative Declaration that included mitigation measures to be implemented in the design, construction, and operation of the previously approved telecommunications facilities within existing utility rights-of-way. Level 3 has incorporated all mitigation measures outlined in the previous Decision into its design of the project addressed in this Proponent's Environmental Assessment (PEA). Therefore, the actions previously imposed as mitigation measures in the CPCN Decision are now Environmental Commitments for the facility addressed herein. In summary, these Environmental Commitments include:

- Measures to mitigate potential impacts to various resources;
- Commitment to obtain all required local, regional, state and federal approvals and permits required for construction and operation of the project;
- Coordination with local and resource management agencies;
- Notifications of adjacent property owners;
- Coordination with other utility projects in the area; and
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the PEA.

Mitigation Measures

No Mitigation Measures are recommended for the Santa Barbara ILA site. All potential impacts can be avoided or reduced to less-than-significant levels through implementation of Level 3's Environmental Commitments and through design features which will eliminate any potential adverse impacts such as:

- (1) Impacts to historic resources which will be avoided by avoiding exterior alterations to the structure and review as required by the City Historic Landmarks Commission;
- (2) Aesthetic impacts which will be eliminated through review and compliance with design requirements imposed through the City's Architectural Board of Review (ABR);
- (3) Noise impacts which will be eliminated through design and construction standards to keep operational noise within required limits; and
- (4) Risk of upset through accidental diesel fuel spills which will be eliminated through implementation of design, maintenance standards and spill response procedures.

ENVIRONMENTAL IMPACTS

I. AESTHETICS

Setting

The site is a 15,900 square foot warehouse located at 122 Helena Avenue in downtown Santa Barbara. The project is located in a developed commercial/industrial area. Surrounding development is industrial in nature and similar in character to the project site with the exception of a restaurant and associated parking directly adjacent to the northeast. The area has been developed in Santa Barbara's characteristic mission style and is well maintained.

The project site fronts to the west on Helena Avenue and is bordered to the east by Anacapa Street. The ROW is separated from the project site to the south by a narrow alley which runs between Helena Avenue and Anacapa Street. The project site is bordered to the north by an industrial warehouse and a restaurant.

The project site is visible for approximately one-quarter mile north on Helena Avenue and Anacapa Street. Views of the project site on these streets are obstructed to the south of the Union Pacific Railroad ROW by a large industrial warehouse. The exterior visual character of the site would not change with implementation of the proposed development.

Helena Avenue and Anacapa Street are not State or locally designated scenic highways (Rap, 1999). The project site is not visible from any designated scenic highways.

Evaluation

a) Would the project have a substantial adverse effect on a scenic vista?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The project site is located on a developed parcel in a developed industrial area. There are no scenic vistas in the project area.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The project site is not visible from a state scenic highway (Rap 1999). There are no natural scenic resources on the site or within the surrounding area.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The proposed project involves the reuse of an existing warehouse for an ILA facility. No changes to the exterior visual character of the site or the surrounding area are proposed.

d)	Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The proposed project involves the reuse of an existing warehouse for an ILA facility. No new sources of light or glare are proposed.

The project will comply with any conditions or design changes imposed through the Architectural Board of Review and/or the Historic Landmarks Commission of the City.

II. AGRICULTURAL RESOURCES

Setting

The project site is located in an urbanized area, characterized by industrial development. The site is presently developed with an approximately 15,900 square foot warehouse. The site is not currently in agricultural use, nor has it been used for agriculture recently. The site is not located on Prime Farmland (General Plan, Open Space, Conservation, and Recreation Element), nor is it under a Williamson Act contract.

There are no local policies for agricultural resources that apply to the project site.

Evaluation

a)	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The proposed use would not convert such farmland to non-agricultural use.

b)	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The project site is not zoned for agricultural use. The project site is not covered by a Williamson Act contract. The site is located in an hotel/retail/commercial/coastal zone district, as designated by the City of Santa Barbara.

c)	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The project site is located in an urbanized area on a developed industrial site. Development of the ILA site would not result in growth-inducing effects or other off-site changes to the environment that would result in the conversion of Farmland to non-agricultural use.

III. AIR QUALITY

Throughout California, the fiber optic cable line will be installed along existing utility corridors in support of the Long-Haul network. In the City of Santa Barbara, the Santa Barbara ILA will be constructed outside of a utility corridor in support of the Long-Haul network. To minimize potential environmental impacts, the ILA facility will be constructed within an existing building at a previously developed site. The ILA facility is the subject of this air quality checklist analysis.

The Santa Barbara ILA site will involve development of a permanent, aboveground facility occupying approximately 0.40 acres. Project activities will include demolition of non-load bearing interior walls, limited site preparation to construct a generator pad outside the building, construction of the ILA equipment supports within the building and installation of equipment, trenching for the innerduct, automated testing of the emergency generators, and approximately weekly trips to the site by one vehicle for maintenance and data logging. Site development will not be required as this site will have the equipment installed within an existing building (except for the emergency generator) and utilize existing parking.

Table 3 provides relevant information on construction and operation activities contributing to emissions of pollutants at the Santa Barbara ILA. Additional technical information used in the air quality analysis is provided in Attachment A. Included in Table 3 are the following construction-related items:

- Estimate of one-way commuting distance (miles) that members of the construction crew will travel to the construction site and numbers of such trips;
- Equipment (e.g., graders, excavators, and water trucks) that will be used at the construction site. Included are the size and number of units of each type of equipment, and the numbers of hours per day and days that each piece of equipment will operate;
- Material delivery vehicles (e.g., cement trucks) are represented in terms of number of trips per day, total number of trips, and number of one-way miles traveled; and
- The amount of material (soil) that will be disturbed during trenching operations at the proposed site as well as during installation of the inner duct between the property line and the building.

A key assumption implicit in the estimation of fugitive dust and emissions construction equipment is that only one piece of equipment will operate at any one time. Off-site emissions due to workers commuting to and from the site, equipment delivery, and other on-road vehicles will occur simultaneously (e.g., during the same day) with emissions from on-site construction equipment. Therefore, maximum daily emissions are determined by the summation of emissions from the highest emitting piece of construction equipment and on-road emissions that occur on the same day as that piece of construction equipment is operating.

Operational parameters specified in Table 3 include specification of the 300 kw size of the emergency standby generator, the approximately 30 minute duration of its weekly test (conservatively estimated as 30 hours/year for emissions estimation), and parameters for the weekly vehicular trip to the ILA site associated with site maintenance and data logging. Normal operation will generate at most one vehicle trip to and from the site on a weekly basis (conservatively estimated as 60 trips/year). The testing of the emergency generator will be triggered automatically. Operating equipment at the site will be powered by electricity from the utility power grid.

Table 3 shows the emission factors and other parameters used to calculate exhaust and fugitive PM₁₀ emissions for mobile equipment (U.S. Environmental Protection Agency, 1996). The Santa Barbara County Air Pollution Control District (SBCAPCD) is responsible for implementing state and federal air quality standards in Santa Barbara County. In addition to the Santa Barbara ILA, two other PEA facilities (Gaviota and Refugio Workaround) are located in Santa Barbara County and are under the jurisdiction of the SBCAPCD.

Setting

The project site is located in the City of Santa Barbara in Santa Barbara County. The county is within the South Central Coast Air Basin which is currently designated as a non-attainment area for state and national one-hour average ozone standards and for state and national particulate matter (PM₁₀) standards (California EPA, 1998). There are a number of industrial and commercial establishments located adjacent to and within 105 feet of the site (Figure 8). The distance of the closest sensitive receptor to the boundary of the site is 650 feet.

Based on monitoring data collected within Santa Barbara County during the three-year period of 1995-1997, maximum ozone concentrations exceeded the National Ambient Air Quality Standard for ozone (0.12 parts per million for one hour) on an average of 3 days per year. The same maximum concentrations exceeded the more stringent California Ambient Air Quality Standard (0.09 parts per million for one hour) on an average of approximately 19 days per year (California ARB, 1996 through 1998). The ozone problem in Santa Barbara County reflects emission sources within the South Central Coast Air Basin and is primarily from mobile sources (motor vehicles).

Ambient PM₁₀ concentrations in Santa Barbara County exceeded the 24-hour-average National Ambient Air Quality Standard of 150 micrograms per cubic meter one time in the period 1995-1997. However, the measured concentrations exceeded the more stringent 24-hour-average California Ambient Air Quality Standard of 50 micrograms per cubic meter roughly 11 percent of the time (California ARB, 1996 through 1998). The PM₁₀ problem in Santa Barbara County is primarily due to mineral quarries, grading, road dust, farming, and construction activities.

The Federal Clean Air Act and California Clean Air Act require plans to be developed for areas designated as non-attainment of the national and state ozone standards, including strategies for attaining the standards. There are three applicable air quality plans for the project area, two related to state and federal ozone standards and one related to the national PM₁₀ standard.

The applicable ozone air quality plans are the Federal Ozone Attainment Demonstration and the State Ozone Air Quality Plan. The applicable PM₁₀ air quality plan is the Federal PM₁₀ Attainment Demonstration Plan.

As part of the ozone and PM₁₀ attainment strategies under the applicable federal and state air quality plans, SBAPCD requires that there be no significant increase in emissions of NO_x, ROC, and PM₁₀ from new and modified sources. To meet these objectives, numerical thresholds are set on construction and operation related emissions of pollutants from internal combustion engines.

In addition, SBCAPCD has adopted Regulation III which mandates implementation at construction sites of fugitive dust control measures contained in the SBCAPCD Dust Control Measures Plan. Fugitive dust is defined as solid airborne particulate matter emitted from sources other than a flue, stack, or tail pipe, but in this case mainly refers to the dust created during construction. SBCAPCD Dust Control Measures Plan describes the required dust control measures. These control measures are used in lieu of numerical thresholds to manage fugitive dust emissions from construction sites.

No SBCAPD Rule or Regulation regulates entrainment of fugitive dust (PM₁₀) emissions from roadways. Entrainment is the kicking up of fugitive dust particles when a vehicle passes over an unpaved roadway.

SBCAPCD Rule 201 and Rule 333 address the permitting, operation, and emission requirements for internal combustion engines. SBCAPCD Rule 202 exempts emergency generators operated less than 200 hours per year from the permit Rule 201. SBCAPCD Rule 333 exempts emergency generators operated less than 200 hours per year from all aspects of the Rule, including emission limits, except for the notification and record keeping requirements. Best Available Control Technology (BACT) will be incorporated into the emer-

agency generator to minimize nitrogen oxide (NO_x) and reactive organic compound (ROC) emissions, precursors to ozone. Controlling NO_x and ROC emissions also indirectly reduce PM₁₀ emissions because both NO_x and ROC are also precursors to secondary formation of PM₁₀.

SBCAPCD does not provide quantitative significance thresholds for construction-related emissions (Santa Barbara County Air Pollution Control District, 1999). The district relies on compliance with fugitive dust control measures enforced through dust control permits to ensure that impacts of construction projects are less than significant. In the absence of numerical thresholds for engine exhaust emissions, Level 3 provides quantitative emissions estimates to assess air quality impacts. Construction emissions from engine exhaust and fugitive dust are compiled in Table 3. Long-term emissions from the emergency standby generator are exempt from quantitative emissions thresholds.

General Conformity requirements (40 CFR Part 93; July 1998) do not apply to this project since it does not involve a federal action such as the use of federal land or the need to acquire a federal permit for the site.

Evaluation

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
---	--	---	---	---------------------------------------

Site construction parameters affecting emissions from mobile sources and the emergency generator, and the resulting emissions are estimated in Table 3. There are no quantitative thresholds of significance for construction-related engine or fugitive dust emissions, and the generator is exempt from long-term emissions thresholds.

Given the small scale of the construction and its temporary nature, project construction will not significantly affect regional ozone concentrations. In that context, while construction activities will generate emissions of the ozone precursors, NO_x and ROC, the applicable ozone plan anticipates that such emission sources would be regulated at the state and federal level, rather than on a project-by-project basis at the local level.

Fugitive dust will not be generated in a significant amount during the construction phase (Table 3) from grading activities and travel of heavy equipment over temporary roads at the construction site as this site will utilize an existing building and the associated paved access roads. The only expected exterior construction activity at this site is the preparation of a 300 square foot area for the emergency generator enclosure. Fugitive dust generation will vary from day to day depending on the level and type of activity (e.g., trenching activities, grading, and vehicular traffic bringing materials to the site), the silt content of the soil, and the weather. Fugitive dust will be controlled in a manner consistent with the applicable air quality plans by implementing effective dust control measures throughout the construction phase, as required by Regulation III. Long-term fugitive dust emissions associated with facility operation will be negligible. The project will include use of a paved road on-site to provide access directly to the buildings and equipment.

Generator testing and the visiting technician vehicle will contribute operational air emissions as shown in Table 3. The generator will be constructed and operated in a manner consistent with existing air quality plans by complying with the requirements of Rule 333. Operation of the emergency standby generator will be in compliance with the requirements of Rule 333 because it will be operated less than 200 hours per year, will not be used in conjunction with any utility voluntary demand reduction program, and will be fully documented with regard to duration of use.

Normal operations will generate approximately one vehicle trip to and from the site each week. The project will generate so little traffic on a long-term basis that none of the measures included in the Carbon Monoxide Maintenance Plan will apply.

Site Specific Environmental Commitments: Level 3 will take the following actions to implement Environmental Commitments in the CPCN Decision:

- Notify the SBCAPCD of the installation of the emergency generator;
- Construct and operate the generator in accordance with SBCAPCD's Rule 202 and Rule 333 exemptions for emergency generators; and
- Minimize NO_x and ROC emissions by employing BACT technology.

As described under III(b) below, Level 3 will comply with requirements in the permit exemption for the emergency standby generators and will also implement fugitive dust control measures to control PM₁₀ emissions during construction work.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
--	--	---	---	---------------------------------------

As discussed above, the Santa Barbara ILA site lies in an area designated as non-attainment of the National and California Ambient Air Quality Standards for ozone and PM₁₀.

SBCAPCD recommends the use of emission thresholds to regulate individual development projects, however CEQA significance thresholds do not apply to emissions from construction equipment to be used in this project (Santa Barbara County Air Pollution Control District, 1999). The SBCAPCD has an indefinite hold on construction related thresholds.

The ILA site would be a permanent building facility occupying approximately 0.40 acres. Site development would be limited to installation of the standby generator in a new enclosure and the installation of the ILA equipment inside of an existing building. The access road/parking already exists and is paved. Construction activities will require up to two months to complete. Construction of the project would generate fugitive dust (including PM₁₀ but also larger-diameter particulate), and other criteria air pollutants from exhaust emissions basically limited to trenching and grading activities and material delivery (such as cement) by truck. Air quality impacts from fugitive dust emissions during construction will be temporary and intermittent.

Fugitive dust emissions during site construction activities are shown in Table 3. There are no numerical thresholds for fugitive dust (PM₁₀) from construction activities. Instead, SBCAPCD Rule 303 requires dust control measures to be implemented during construction. As discussed under III(a) above, Level 3 will implement a comprehensive series of dust control measures to manage fugitive dust during construction.

Over the long-term, the project would result in emissions from operation of both stationary and mobile sources. However, mobile source emissions would be negligible because the site would be unmanned and routine motor vehicle activity would result only from weekly site visits to check on the computers, download information, and test-run the emergency generator. Stationary source emissions would result from operation of the emergency diesel-powered standby engine during weekly routine testing and during unforeseen emergency electricity loss. ROC emissions from the aboveground diesel storage tank would be negligible.

Routine weekly maintenance tests of the standby engine would be approximately 30 minutes. These tests will be scheduled at times when the adjacent restaurant is not serving food. Emissions on a given day when the engine would undergo such a test are shown in Table 3 and do not approach the SBCAPCD-recommended significance threshold for operational-phase impacts (25 pounds per day). The estimated annual emissions from this 449-horsepower engine at expected 75% load, based on the annual usage rate

of 30 hours, are shown in Table 3. These emissions estimates were made using published emission factors for diesel industrial engines (U.S. EPA, 1996).

Site-Specific Environmental Commitments: The Proponent will take the following actions to implement Environmental Commitments in the CPCN Decision to ensure air quality impacts will be less than significant.

Level 3 will develop and implement a construction dust abatement program as required by SBCAPCD Rule 303. Implementation of that program will reduce potential impacts to less than significant levels. Level 3 will also comply with the requirements of SBCAPCD Rule 333, including documentation that the generator will not be operated more than 200 hours per year and will not be used in conjunction with any utility voluntary demand reduction program. Thus, no numerical standards apply to emissions from these generators.

As described under III(a) above, Level 3 will comply with requirements in the permit exemption for the emergency standby generators.

Level 3 will fully comply with SBCAPCD's Rule 303 by implementing the following dust control measures during construction:

- Dust emissions from all disturbed areas, including storage piles that are not being actively utilized for construction purposes, will be effectively stabilized using water, chemical stabilizer, suppressant, or vegetative cover;
- Dust emissions from all on-site unpaved roads and off-site unpaved access roads will be effectively stabilized using water, chemical stabilizer, or suppressant;
- Fugitive dust emissions from all excavation, land-leveling, grading, and demolition activities will be effectively controlled by watering during these activities or presoaking;
- When materials are transported off-site, all material will be covered, effectively wetted to limit visible dust emissions, or kept below at least six inches of freeboard space from the top of the container;
- All operations will limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at least once every 24 hours when operations are occurring. Dry rotary brushes will not be used except when preceded or accompanied by sufficient wetting to limit the visible dust emissions. Blower devices will not be used; and
- Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, fugitive dust emissions from the piles will be effectively stabilized utilizing sufficient water, chemical stabilizer, or suppressant.

c)	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal and state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Santa Barbara ILA site is one of three PEA sites in the County under the jurisdiction of the SBCAPCD (the others being the Gaviota and Refugio Workarounds). Potential total construction emissions were analyzed for the possibility of simultaneous construction at all three sites and are shown in Table 4.

Simultaneous construction at all three sites would result in the following emissions of criteria air pollutants relative to total daily emissions in Santa Barbara County (from California EPA, 1999) and would not exceed the following values:

<u>Pollutant</u>	<u>Percent of Daily Emissions</u>
NO _x	0.3
ROG	0.02
PM ₁₀	0.4
CO	0.02

These estimates reflect a worst-case assumption in which the highest-emitting activity occurs at each site on the same day. In any case, emissions will not substantially alter ambient levels of criteria air pollutants. Construction activities will also be of limited duration.

With respect to ozone, the project's emission rates of the ozone precursors NO_x and ROG are extremely small in relation to total District emissions. Hence, the project's emissions will not be cumulatively considerable in comparison to total emissions in Santa Barbara County. Ozone impacts are the result of the cumulative emissions from numerous sources in the region and transport from outside the region.

Because surface disturbance will be limited to an area of approximately 300 square feet of the 0.40 acre site, surrounding uses will be buffered from the effects of project construction (see Figure 7 for the "conceptual plot plan"). This buffer will help minimize the possibility that the project will cause a cumulatively significant short-term PM₁₀ impact from simultaneous and unrelated construction projects taking place within the same general area, which is dominated by industrial use.

Total project emissions from testing and maintaining the emergency generator at the PEA site in Santa Barbara County are exempt from offset requirements because these emissions from the generator are exempt. Emissions that are exempt from regulatory requirements are considered to have impacts that are less than significant.

Emissions from simultaneous construction will not substantially impact regional air quality. Local impacts will be limited by implementation of dust control measures as indicated in Section III(b) and the limited scope of exterior construction. As such, the incremental cumulative impact of such emissions will be less than significant.

d)	Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Sensitive receptors are defined as facilities that house children, elderly, and ill members of the population, such as schools, day-care centers, hospitals, retirement homes, hospices, and residences. The nearest neighbors to the ILA site are a number of industrial establishments located adjacent to the site (Figure 8), but which do not qualify as sensitive receptors. The distance of the closest sensitive receptor to the (closest edge of the) site is approximately 650 feet.

Project construction except for trenching and limited grading activities will take place primarily within an existing building; therefore, receptors associated with surrounding uses would be buffered from the effects of project construction (see Figure 7 for the "conceptual plot plan"). This buffer, along with the low levels of construction emissions, would prevent substantial pollutant concentrations from reaching sensitive receptors. Through application of fugitive dust control measures described above, these emissions will be kept below a level of significance.

During construction, site access will be easy and direct. Construction vehicles will not block traffic on Helena Avenue, Anacapa Street, or other streets in the area for any significant period of time. Thus, emissions from idling vehicles in the vicinity of the sensitive receptors will be minimal.

The emergency generator will produce operation emissions during testing and power outages. Two factors prevent these emissions from significantly affecting sensitive receptors. First, the generator will not be located in close proximity to sensitive receptors due to the establishment of buffer zones where development will be excluded (see Figure 7 for the "conceptual plot plan"). Second, generator usage will be restricted to approximately 30 minutes per week. These measures will assure that sensitive receptors are not exposed to substantial pollutant concentrations.

e)	Would the project create objectionable odors affecting a substantial number of people?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The only potential odor that may be associated with site construction activities at the Santa Barbara ILA site will be diesel engine exhaust. The low level of construction activity would not produce enough exhaust to affect the offsite public, which is limited to the few employees in the surrounding industrial facilities. Similarly, testing of the emergency generator at the ILA site for no more than one hour per week will not produce sufficient exhaust nor odor to be objectionable to a substantial number of people.

IV. BIOLOGICAL RESOURCES

Setting

The conditions for supporting biological resources on the project site are poor. The site consists of a concrete commercial structure located within completely developed commercial setting. The perimeter and surrounding areas are paved. The site itself is a concrete structure with tile roof. Nooks of the tile roof may provide nesting habitat for some bird species other than raptors. Wildlife species observed during included rock dove (*Columba livia*) and hummingbird (*Calypte* sp.). Plant species observed were tree tobacco (*Nicotiana glauca*), fountain grass (*Pennisetum setaceum*), and California date palm (*Phoenix* sp.).

Surrounding the project site in all directions lie commercial and industrial facilities. The UPRR is roughly 70 feet from the site. Invasive, ruderal plant species dominate the UPRR ROW in this region. Biological resource conditions are poor. The only wildlife species observed during the survey was the California gull (*Glaucus californica*). Plant species observed were fountain grass (*Pennisetum setaceum*), wild oats (*Avena* sp.), and fennel (*Foeniculum vulgare*).

Evaluation

a)	Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The site consists of a concrete building located within a completely developed urban setting. No habitat occurs onsite for any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service (the site exhibits poor habitat for nesting or foraging raptor species). It is highly unlikely that the site is utilized by any species as mentioned above, therefore the project is not expected to result in any impacts to such species. A list of sensitive species that could potentially occur on the project site was

created based upon a California Natural Diversity Database search of the Santa Barbara Quadrangle (California Department of Fish and Game, September 1999) and knowledge of the project area. Table 5 includes these species and their potential for occurrence onsite.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

One tree tobacco (*Nicotiana glauca*) tree, three date palms (*Phoenix* sp.), and fountain grass (*Pennisetum setaceum*) are located at the edge of the building and the paved perimeter, growing from the seam in the pavement. Tree tobacco is considered to be a facultative (FAC) wetland species and is sometimes an invasive component of riparian systems. However, no watercourse exists onsite, therefore the plant species is not considered riparian. No riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service exists onsite or in the immediate vicinity. Therefore, the project is not expected to have any impact on the above mentioned resources.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

One tree tobacco (*Nicotiana glauca*) tree, three date palms (*Phoenix* sp.), and fountain grass (*Pennisetum setaceum*) are located at the edge of the building and the paved perimeter or growing from the seam in the pavement. Tree tobacco is considered to be a facultative (FAC) wetland species. However, hydrophytic vegetation is not dominant, hydrological indicators were not evident, and the area had been paved. Therefore, no federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) were observed onsite. No impact to wetlands will result from the proposed project.

d) Would the proposal 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?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

It is possible that bird species, other than raptors, could utilize the tile roof as nesting habitat. However, the proposed project is not expected to impact such nesting habitat. It is highly unlikely that the site provides any habitat for migratory wildlife or is a component of any wildlife corridor because of the development of the surrounding vicinity. Because the site and the immediate surroundings are paved and developed, and the site is void of natural habitat, it is not expected to serve as any component of a migratory wildlife corridor or native wildlife nursery. Therefore, the proposed project is not expected to interfere 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.

e) Would the proposal conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The City of Santa Barbara requires, for all trees planned to be removed within the city, a permit for tree removal from the City Arborist. However, no trees are expected to be removed as a result of the proposed project, therefore the project is expected to have no conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (Palmer, 1999; Leider, 1999).

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

Neither the City nor the County of Santa Barbara have adopted a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans. Due to the absence of applicable local and regional conservation plans, and the urban setting in which the site is located, the project is not expected to conflict with any conservation plan mentioned above (Shelton, 1999; Leider, 1999).

V. CULTURAL RESOURCES

Setting

The property is located adjacent to the railroad in central Santa Barbara. There is a reinforced concrete warehouse that occupies most of the property, while the rest of the property is paved.

King (1981) has divided the prehistory of the Santa Barbara Channel region into three periods: Early (8000 to 3350 B.P.), Middle (3350 to 800 B.P.), and Late (800 to 150 B.P.). King's chronology is based on stylistic changes in beads and ornaments from burial assemblages. The artifact types which indicate temporal affiliation are seldom found in quantity outside of cemeteries, limiting the usefulness of the chronology for dating components at other kinds of sites. However, the chronology can be tied to absolute dates through radiocarbon dating. Dates for the beginning and end of each of King's periods are based on radiocarbon dates from burial assemblages (King, 1981).

King's Early Period (8000 to 3350 B.P.) has been divided into three phases – X, Y, and Z, with a gap in time between Phases X and Y. Preceding the peak of a warm, dry climatic period known as the Altithermal, Phase X is characterized by the use of large flake and core tools, millingstones, and handstones. Millingstones indicate the grinding of hard seeds, probably gathered from sage (*Salvia*) plants. Mortars and pestles, which indicate the pounding of acorns, were not widely used until the onset of Phase Y, after the peak of the Altithermal (Glassow, Wilcoxon, and Erlandson, 1988:8). Evidence for the pursuit of sea mammals also appears during Phase Y. This broadening of diet is likely related to a population increase associated with the easing of Altithermal conditions (Glassow, Wilcoxon, and Erlandson, 1988). Evidence useful for reconstructing settlement patterns during the Early Period is extremely limited. Based on these limited data, King (1981) suggests that Phase X sites along the Santa Barbara Channel were located on the crests of hills away from the ocean, while Phase Y sites were often situated on knolls adjacent to sloughs. During Phase Z, King notes that sites again occur on higher ground. All Early Period sites investigated appear to be base camps, although temporary camps also likely existed.

During the Middle Period (3350 to 800 B.P.) increasing sedentism and increasing emphasis on marine sub-

sistence along the Santa Barbara Channel is reflected by the appearance of coastal villages occupied during a large part of the year. Circular shell fishhooks supplement the bone gorges and compound fishhooks which came into use during the Early Period (Tartaglia, 1976). The plank canoe, which made ocean fishing and travel to the Channel Islands safer and more efficient, came into use about 1500 B.P. (Arnold, 1987:7). Use of the plank canoe also promoted trade and exchange between the mainland and the Channel Islands. Terrestrial hunting is indicated by use of contracting stemmed and corner-notched dart points (used with spear throwers). Increasing status differentiation is reflected by differences in amounts of beads and other ornaments associated with burials (Martz, 1987).

The full development of Chumash culture, one of the most socially and economically complex hunting and gathering groups in North America (Arnold, 1987:4), occurred during the Late Period (800 to 150 B.P. or approximately A.D. 1150 to 1800). Along the Santa Barbara Channel and on the Channel Islands there were a series of permanent or semi-permanent villages with populations of 200 to 600 or more individuals (Grant, 1978b). The principal economic pursuits were marine fishing and trading. Status differentiation had developed to the point where village chiefs inherited their rank and probably controlled trade and redistribution.

When the Spanish arrived in A.D. 1769 the Chumash occupied the coast from Malibu Canyon to San Luis Obispo and inland as far as the western edge of the San Joaquin Valley (Grant, 1978a). The Chumash were divided into several language or dialect groups that corresponded with territory around the missions founded by the Spanish. From south to north along the coast, there were the Ventureño around San Buenaventura Mission (now in Ventura), the Barbareño around Santa Barbara Mission, the Purisimeño around La Purísima Concepción Mission (near Lompoc), and the Obispeño around San Luis Obispo Mission. These missions were founded between 1772 and 1788. The Cuyama, Emigdiano, and Castac were inland Chumash who lived where no missions were founded. The northern Channel Islands were also inhabited by Chumash.

Evaluation

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
--	--	---	---	---------------------------------------

The protocols contained in Level 3's *Long Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999), requiring records searches and field survey, where appropriate, were followed as summarized below. A technical report, providing more information on the results of the records search and field surveys has been prepared (Mason, 1999b).

Level 3 archaeologists requested a records search for the proposed Santa Barbara ILA site, and the lands within a one mile radius, from the Central Coastal Information Center at the University of California, Santa Barbara. The search had two objectives: (1) to determine whether previous archaeological investigations have been conducted in the project area, and (2) to provide information on known historic sites or culturally sensitive areas on and in the vicinity of the proposed ILA Facility. The records search was conducted by Information Center staff who also checked the OHP Historic Property Data File for Santa Barbara County, which includes the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, and California Historical Landmarks.

In addition, the Level 3 Team sent a letter dated September 3, 1999 to the Native American Heritage Commission (NAHC) requesting a search of the NAHC Sacred Lands file and identification of a contact person or persons within NAHC for follow-on contact/consultation (Mason, 1999a). The response, dated September 17, 1999, indicated that the NAHC search revealed no site-specific information on Sacred Lands (McNulty, 1999). The letter cautioned that absence of information did not necessarily indicate the absence of cultural resources. A list of Native American contacts that might serve as sources of additional information was also

provided. Level 3 has followed up on this response from NAHC by sending letters to NAHC-identified Native American contacts residing in Santa Barbara County, notifying them of the Level 3 project activities and requesting information they might have on sacred lands. Any response indicating the possible presence of Sacred Lands will be followed up with a detailed, site-specific evaluation utilizing the expertise of the relevant Native American contacts. The results of this effort are fully documented, as appropriate, in the supporting technical report (Mason, 1999b).

The results of the records search (no CHRIS file number assigned) showed that the property had not been previously surveyed for historic resources (California Historical Information System, Central Coastal Center, 1999). A field survey showed that there is a structure more than 50 years old present on the property.

The structure is a Spanish Colonial Revival style warehouse. The one-story, reinforced concrete structure was built in a trapezoidal plan, and features a red clay tile roof, a full length clerestory with raised frame sidelights, a slight tower above French doors that identifies the main entrance on Helena Avenue, and a series of arcades, some demarcating loading bays, along all elevations.

The warehouse was built in 1920 by the Sperry Flour Company. Subsequent owners were Western States Grocery (after 1935), Bank of America, and the Capital Company (1941-1943). In 1943, the building was purchased by Bekins, a prominent California moving, storage, and transfer company. Under Bekins' ownership, tenants included the State Relief Fund, Vega Aircraft (1943), Lockheed Aircraft (1944-1945), Columbia Records (1957-1961), and Technical Dynamics (1961-1962). Bekins remained the owner of the building until at least 1987. An architectural history survey and evaluation was performed by qualified architectural historians (Starzak and Miller, 1999).

The warehouse structure meets the criteria for potential listing in the California Register of Historical Resources, hence is an "historical resource" for the purposes of CEQA. The building was included in the *Architectural and Historic Resources Survey of the City of Santa Barbara*, which was conducted in 1978. The building was also considered eligible for listing in the National Register of Historic Places as part of a 1983 tax certification application prepared for the Bekins Warehouse complex, which included the warehouse across the railroad tracks at 25-27 East Mason Street. The tax certification application was received by the State Historic Preservation Officer on September 27, 1983; however, no record is available that the complex was ever formally determined eligible for the National Register. Consequently it is not clear if the building is already listed in the California Register, but given the evaluations in the 1978 city survey and 1983 tax certification application, and the fact that a field survey indicates it retains integrity, it is considered to be an "historical resource" (significant) for the purposes of CEQA.

The building would be used by the proposed Level 3 project to house signal amplification equipment. This proposed use is consistent with the building's historical function, given that it was previously a warehouse, aircraft assembly plant, and storage facility for recording and electronic equipment.

Installation of the ILA facility in the building will not result in changes to exterior or load-bearing interior walls, to windows, or to roof trusses. Removal of non-load bearing interior walls to accommodate ILA electronics will comply with historic resources guidelines and will not have a substantial adverse effect on the structure. The generator will be placed on the side of the building adjacent to the railroad tracks on a concrete pad, and surrounded by a sound-dampening wall constructed of blocks and covered with stucco. The enclosed pad will be architecturally detached from the historical resource. Because the generator enclosure will be detached from the historic building, it will not have a significant effect on the historic fabric of the building.

Section 15064.5(b)(3) of the CEQA guidelines states:

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less

than a significant impact on the historical resource...

Therefore, following the Secretary's Standards (36 CFR § 67.7) will ensure that any alterations to the historical resource required for the proposed project would not compromise the eligibility of the resource for the California Register of Historic Resources.

Because use of the building by Level 3 will not result in inappropriate alterations to the building's interior or exterior historic fabric, as defined by Secretary's Standards (36 CFR § 67.7), the proposed Level 3 project will not result in a substantial adverse change in the significance of the historical resource, and will not be a significant effect under CEQA. Therefore, no mitigation will be required.

Site-Specific Environmental Commitments: Level 3 will follow the Secretary's Standards (36 CFR § 67.7) to ensure that any alterations to the historical resource required for the proposed project would not compromise the eligibility of the resource for the California Register of Historic Resources. Level 3 will follow any additional recommendations from the City's Historic Landmarks Commission, if required.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The records search from the Central Coastal Information Center indicated that fifteen archaeological sites had been previously recorded within one mile of the ILA site (California Historical Information System, Central Coastal Center, 1999). The records search also showed that the property had not been previously surveyed for archaeological resources. There is no exposed ground surface on the parcel where a field survey could be undertaken. The facility will be installed inside the existing building .

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
---	--	---	---	---------------------------------------

As mapped by Dibblee (1966), the project site is underlain by Quaternary alluvium (unit Qal). No fossil site is recorded in the archives of the Natural History Museum of Los Angeles County Vertebrate Paleontology Section or the University of California Museum of Paleontology as occurring in this rock unit at the project site or elsewhere in the Santa Barbara 7.5-minute quadrangle. Moreover, no fossil vertebrate site is reported as occurring in this rock unit in the immediate project site vicinity by Jefferson (1991a, 1991b). Although there is a potential for late Pleistocene and early Holocene continental vertebrate and land plant fossil remains and marine mollusk fossil remains occurring in the subsurface at the project site, it is unlikely construction-related earth moving at the project site would extend to a depth great enough to encounter remains old enough to be considered fossilized.

No mitigation measure would be required unless earth moving extended to a depth greater than 5 feet below current grade. Below 5 feet, construction-related earth moving will be monitored by a qualified vertebrate paleontologist or a qualified paleontologic construction monitor to allow for the recovery of larger fossil remains, and rock samples would be processed to allow for the recovery of smaller fossil remains. All recovered fossil remains would be fully treated (prepared, identified by knowledgeable paleontologists, curated, catalogued) and, along with associated specimen data and corresponding geologic and geographic site data, placed in a recognized museum repository. The paleontologist would prepare a final report of findings that includes an inventory of recovered fossil remains. These measures would be in compliance with Society of Vertebrate Paleontology (1995, 1996) guidelines for the management of paleontologic resources and for the museum acceptance of a monitoring program fossil collection.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The records search provided no evidence of the presence of human remains (California Historical Information System, Central Coastal Center, 1999). If suspected human remains are encountered during construction, operations will stop until the proper official has been notified, the find evaluated, any mitigation recommendations implemented, and Level 3 has been cleared to resume construction in the area of the find. The procedures to be followed are described in detail in Level 3's *Long-Haul Fiber Optics Project Cultural Resources Procedures* (Parsons Brinckerhoff Network Services, 1999:25-39), approved by the California Public Utilities Commission (CPUC).

VI. GEOLOGY AND SOILS

Setting

The project site lies in a relatively flat area in the City of Santa Barbara. Santa Barbara is located in a geologically active area, with several active faults in the vicinity. The project site vicinity is not located within an Alquist-Priolo zone, or landslide, liquefaction, subsidence, or geologic hazard area (CDMG, 1973, 1999). Erosion activity is moderate and the soils are highly expansive.

Evaluation

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Mines and Geology Special Publication 42. ii) Strong seismic-related groundshaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides? 	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The project site is not located within an Alquist-Priolo zone, or landslide or liquefaction geologic hazard area (CDMG, 1973, 1999). However, the project site is located in a seismically active area. The project site area can experience high magnitude groundshaking from nearby active fault systems (i.e., faults exhibiting displacement within the last 11,000 years) (CDMG, 1994). The major active faults in the vicinity of the project site are the Red Mountain, Ventura, and San Andreas faults (CDMG, 1994). The Red Mountain fault is closest to the site at approximately 13 miles (Blake, 1989). These faults can produce a maximum earthquake magnitude of approximately 6.8, 6.8, and 7.8, respectively (CDMG, 1996). A 10% probability of peak ground accelerations of 40% to 50% g in 50 years is expected in the site vicinity (CDMG, 1996). As part of the Proponent's environmental commitment to this project, any potential seismic hazard would be minimized by compliance with the California seismic code standards and applicable local building and seismic

codes. Because of Proponent's environmental commitment to this project, the project would not expose people or structures to substantial adverse effects attributable to these potential geologic hazards. Therefore, no impacts would occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The site is nearly flat, and is located in an area of moderate erosion activity (CDMG, 1973). The existing building occupies the majority of the site and much of the remainder is paved. Therefore, substantial soil erosion or loss of topsoil would not occur as a result of the project because of the lack of exposed soil surface.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The site is nearly flat, and the geologic units and soils on the site are not unstable. The existing building at the site would be used to house the ILA facility. Therefore, the minimal plowing or trenching from the UPRR ROW to the existing building for the fiber optic cable would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The project area has highly expansive soils (CDMG, 1973). As part of the Proponent's environmental commitment to this project, the Proponent would minimize any potential impacts associated with these soils through compliance with structural and design regulations (i.e., compliance with the Uniform Building Code, and all local design, construction, and safety standards). Because of the Proponent's environmental commitment to this project, no substantial risk to life or property would be created. Therefore, no impacts would occur.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

Municipal sewer connections at the site would be used for the disposal of wastewater. Therefore, there will be no need for septic tanks or other alternative wastewater disposal systems at the site. Therefore, no impacts would occur.

VII. HAZARDS AND HAZARDOUS MATERIALS

Setting

No indications of potential hazardous materials or storage were found in database searches (Vista Information Solutions, *California Site Assessment*, 1999) and during a site visit. There are no schools within the vicinity of the site. There are no airports in the vicinity of the site and the site is not located within any airport safety zone.

Evaluation

a)	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The 1,000-gallon, double-walled above-ground storage tank containing diesel fuel would be located on site to supply an emergency generator. This tank would comply with all federal, state, and local regulations for fuel storage, including overfill protection, vapor emissions, containment, and notification. Fuel deliveries would comply with spill protection and off-loading regulations. Waste generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations. The generator and storage tank would be located inside an equipment enclosure within a fenced compound that will be locked to provide security.

b)	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

Hazardous materials (diesel fuel) would be stored in an above-ground storage tank, with monitoring, alarm, and leak containment features. The tank would provide hazard containment against reasonably foreseeable upset and accidents. The tank would be located inside an equipment enclosure within a fenced compound that will be locked to provide security.

c)	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

No existing school or proposed school is located within one-quarter mile of the site.

d)	Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The project would not be located on a site included on a list of hazardous materials sites (Vista Information

Solutions, *California Site Assessment*, 1999).

e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The site is not located within an airport land use plan or within two miles of a public airport or public use airport.

f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The site is not located within the vicinity of a private airstrip.

g)	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

Development of this site would not alter emergency response or emergency evacuation routes. Roadways would not be blocked either during construction or operation.

h)	Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The proposed structure would be located in an urbanized area zoned for Hotels and Related Commerce/Coastal (HRC-2)/S-D-3. The structure is not located in the vicinity of any wildland areas. Generators would be equipped with spark arrestors to further reduce the potential for loss, injury, or death involving fires.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The project site is located in the Santa Barbara groundwater basin, but is not located in an area that contributes to groundwater recharge. The site is located in a 100-year floodplain (Vista Information Systems, NEPA Checklist, 1999) and in an area that would be subject to inundation as a result of tsunami or seiche (Santa Barbara County Comprehensive Plan, Seismic Safety and Safety Element, 1991).

The ILA site includes a 15,900 square foot building on a 17,000 square foot parcel. Development at the Santa Barbara site will not modify drainage of stormwater from the site.

Site-Specific Environmental Commitments: The following actions will be taken to ensure that hydro-

ogy/water quality impacts are minimized during construction and operation of the Santa Barbara Terminal site.

As appropriate, Level 3 will implement the following measures to avoid and minimize effects on any nearby aquatic environments. Appendix E identifies the documents and practices in which these measures will be specified.

- Bore under sensitive habitats when practicable;
- Implement erosion control measures during construction;
- Remove cover vegetation as close to the time of construction as practicable;
- Confine construction equipment and associated activities to the construction corridor;
- No refueling of construction equipment will take place within 100 feet of an aquatic environment;
- Comply with state, federal, and local permits;
- Perform proper sediment control;
- Prepare and implement a spill prevention and response plan;
- Remove all installation debris, construction spoils, and miscellaneous litter for proper offsite disposal; and
- Complete post-construction vegetation monitoring and supplemental revegetation where needed.

A Notification of Intent (NOI) will be submitted to the applicable RWQCB and the State Water Resources Control Board for construction of the Santa Barbara Terminal site under the *General Storm Water Permit to Discharge Storm Water Associated With Construction Activity*. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and will include the following: 1) Project Description; 2) Best Management Practices (BMPs) for Storm Water Pollution Prevention; 3) Inspection, Maintenance, and Record Keeping; and 4) Training.

Although the area of disturbed ground on the Santa Barbara site will be less than five acres, and will therefore be less than the minimum size requirement for a SWPPP, the cumulative area of the total ILA, Terminal, 3R, and Distribution Node sites associated with this project is greater than five acres. Accordingly, an NOI will be submitted, and a SWPPP will be prepared.

Evaluation

a)	Would the project violate any water quality standards or waste discharge requirements?	Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposal would not discharge substances that could contaminate water. Hazardous materials (diesel fuel) would be stored in a 1,000-gallon, double-walled, above-ground storage tank, with monitoring and leak containment features. The tank would provide hazard containment against reasonably foreseeable upset and accidents. Wastes generated by equipment maintenance would be disposed of off-site in accordance with all applicable regulations.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The project will not extract groundwater, therefore, groundwater supplies will not be depleted, nor will the project interfere with groundwater recharge. The site is not located in an area that contributes to groundwater recharge.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The project would not alter the existing drainage pattern of the site or area because the surface of the trench area will be returned to its original condition and the ILA electronics will be placed inside an existing building.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The project would not alter the existing drainage pattern of the site or area because the surface of the trench area will be returned to its original condition and the ILA electronics will be placed inside an existing building.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The project would not create or contribute runoff water because the ILA will be placed inside an existing building. Existing site drainage will not be altered.

f) Would the project otherwise substantially degrade water quality?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

No impacts to water quality are expected as a result of this project. The project would not produce contaminated runoff, generate wastewater, nor discharge substances that could contaminate water.

g)	Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
----	---	--	---	---	---------------------------------------

The project will not include housing. The project is located within a 100-year floodplain (Vista Information Solutions, FEMA floodplain map, NEPA Checklist, 1999).

h)	Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
----	--	--	---	---	---------------------------------------

The project is located within a 100-year floodplain (Vista Information Solutions, FEMA floodplain map, NEPA Checklist, 1999). The ILA will be located in an existing building; however, the design will incorporate all flood-protection measures deemed necessary for the site by Santa Barbara County, taking into consideration the type of use and risk level at this location.

i)	Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The site is located in a 100-year floodplain (Vista Information Systems, NEPA Checklist, 1999) and is therefore subject to flooding. There are several lakes in the County the largest of which is Lake Cachuma. All the lakes except Cachuma are located well away from the site. Drainage to and from Lake Cachuma is such that dam failure or other loss of water from the lake would not effect the site (Santa Barbara County Comprehensive Plan, Seismic Safety and Safety Element, 1979, page 115). The ILA will not be permanently occupied and flooding will therefore not present a significant risk to human life.

j)	Would the project expose people or structures to a significant risk of loss, injury or death due to inundation by seiche, tsunami, or mudflow?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The site is located in an area that would be subject to inundation as a result of tsunami. Seiches are possible from the lakes located within Santa Barbara County but are primarily a risk to people and property located near the lakes. No lakes are close enough to the site to present a risk from seiches. Tsunamis, while possible, are given a low probability of occurrence and a limited height in wave size due to bottom conditions off the coast from the site (Santa Barbara County Comprehensive Plan, Seismic Safety and Safety Element, 1979, p. 112-116). The potential for mudflows in not discussed in the Santa Barbara County Comprehensive Plan or the City of Santa Barbara Master Environmental Assessment. However, the site is located on flat ground in an urban developed area and the potential for mudflows would therefore seem to be low. The ILA will not be permanently occupied and flooding or other threats from water will therefore not present a significant risk to human life.

IX. LAND USE PLANNING

Setting

The General Plan land use designation for the project site is Hotel, Motel, and Related Commerce (HRC). This land use classification is oriented toward visitors to the City. Commercial uses considered to be related to hotels and visitors are considered appropriate areas with this land use designation. Such commercial uses include restaurants, commercial recreation facilities, specialty and gift shops, and automobile service stations.

The City of Santa Barbara Zoning designation for the project site is Hotel and Related Commerce (HRC-2) with the S-D-3 Coastal Overlay designation. The HRC-2 zone is defined as the following:

This is a zone which, because of its proximity to the shoreline and its location along two major arteries, strives to promote, maintain and protect visitor-serving and commercial recreational uses. Tourist and traveler related uses shall be encouraged in this zone in a manner which does not detract from the desirability of the shoreline as a place to visit. Residential uses are appropriate in certain areas of the HRC-2 zone (Santa Barbara Municipal Code 28.22.001).

The S-D-3 zone is defined as the following:

The S-D-3 Zone is applied to the "Coastal Zone" which is defined as generally all of the land 1,000 yards from the mean high tide line as established by the Coastal Act of 1976 and as it may subsequently be amended, which lies within the City of Santa Barbara (including the Santa Barbara Municipal Airport and Goleta).

The Coastal Overlay Zone is established for the purpose of implementing the Coastal Act of 1976 (Division 20 of the California Public Resources Code) and to insure that all public and private development in the Coastal Zone of the City of Santa Barbara is consistent with the City's Certified Local Coastal Program and the Coastal Act (Santa Barbara Municipal Code 28.45.009).

Permitted uses under the HRC-2 zoning designation include development of hotels, motels, and tourist courts including related recreational, conference center, and other auxiliary uses primarily for use by hotel guests. The presence of the industrial warehouse building proposed as the project site is owing to its construction and use prior to application of the HRC-2 zoning designation. The proposed project, considered a communications facility, is not included as a permitted use nor as a use permitted upon the issuance of a Conditional Use Permit.

The project site is located in the coastal zone, as designated by the S-D-3 Coastal Overlay Zone. Therefore, the proposed project must also conform with the City's adopted Local Coastal Plan and would require approval of a Coastal Development Permit.

The existing warehouse use is a non-conforming use in the HRC-2 zoning district. A provision in the City of Santa Barbara Zoning Ordinance allows the changing of a non-conforming use to another non-conforming use, provided the intensity of development or use on the subject site does not increase (Henon, 1999). Based on conversations with City Staff, it is unclear what the permitting process for this type of allowable conversion would be.

City Staff has indicated that the land use permitting process for this site is unclear (Henon 1999). It is possible that the proposed project would be prohibited on the proposed site because of its inconsistency with existing zoning. It is also possible that the proposed project could be allowed under the provision in the City

of Santa Barbara Zoning Ordinance that allows the changing of a non-conforming use to another non-conforming use, either through an administrative permitting process, or a discretionary Conditional Use Permit. A discretionary Coastal Development Permit, approved by the City's Local Coastal Commission, would be required for development of the proposed project.

Evaluation

a) Would the project physically divide an established community?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project involves the reuse of an existing industrial site for an ILA facility. The project would not result in physical or visual division of an established community.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
---	--	---	---	---------------------------------------

The project site is located in the Hotel, Motel, and Related Commerce (HRC) General Plan designation, and the Hotel and Related Commerce (HRC-2) zoning designation, with the S-D-3 Coastal Overlay designation. The proposed project would be considered a communications facility under the City of Santa Barbara Zoning Ordinance and is not included as a permitted use in the HRC-2 zoning district.

Based on information provided by the City of Santa Barbara Community Development Department, Planning Division, it is unclear what the land use permitting process for the proposed project would be. There are two scenarios for land use permitting:

Scenario 1: The proposed project would be permitted under a provision in the City of Santa Barbara Zoning Ordinance that allows the changing of a non-conforming use to another non-conforming use, provided the intensity of development or use on the subject site does not increase. Under this scenario, the City would allow the proposed project at the proposed location subject to discretionary permits, such as a Coastal Development Permit and/or a Conditional Use Permit.

Scenario 2: The proposed project would be prohibited in the proposed location. Under this scenario, there would be a significant land use and planning impact. The proposed project could not go forward in the proposed location because it would conflict with adopted land use plans and policies of an agency with jurisdiction over the project site.

Level 3 will apply to the City of Santa Barbara for a zoning variance to change from one non-conforming use to another non-conforming use. Level 3 will comply with conditions stipulated by the City should the zoning change be granted.

Placement of the emergency standby generator shelter will be the only exterior development at the ILA site. The generator shelter will be located along the southeast side of the building in the side yard adjacent to the UPRR right-of-way. Because the ILA site does not border on residential property, there are no setbacks required along the sides of the building in HRC-2 zones (City of Santa Barbara Zoning Ordinance, Municipal Code Chapter 28.22060). Therefore, installation of the generator will not conflict with the municipal zoning ordinance.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

Neither the City nor the County of Santa Barbara have adopted a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Due to the absence of applicable local and regional conservation plans, and the urban setting in which the site is located, the project is not expected to conflict with any conservation plan mentioned above (Shelton, 1999; Leider, 1999).

X. MINERAL RESOURCES

Setting

The project site is not in an area designated by the State or the City of Santa Barbara for known mineral resources (Rap 1999). There are no local policies for mineral resources that apply to the proposed project or project site.

Evaluation

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project would be located within an existing building on a developed industrial site. No impacts to mineral resources of value to the region or to the State would result.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan other land use plan?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project is located within an existing building on a developed industrial site. The site is not designated in the general plan, specific plan, or other land use plan as having locally important mineral resources.

XI. NOISE

Setting

The Santa Barbara ILA site is located in the City of Santa Barbara in Santa Barbara County (Figure 2). A number of industrial establishments are located adjacent to the site (Figure 8). The site is designated as "Hotel and Related Commerce" (City of Santa Barbara, 1997) and is zoned as HRC-2/SD3. Public receptors of operational and construction noise border the property to the northwest, and an industrial facility is directly opposite the railroad right-of-way along the southeast side of the ILA site.

The site is approximately 8.5 miles from the Santa Barbara Municipal Airport but is not within the airport land use plan. There are no private airports near the site. Estimates of daytime and nighttime ambient noise levels (52 dBA and 47 dBA, respectively) were derived from Schomer and Associates (1991) as typical of sites designated as "quiet commercial and industrial areas."

The Santa Barbara ILA Site will involve development of a permanent, aboveground facility occupying approximately 0.40 acres. Project activities will include demolition of non-load bearing interior walls, limited site preparation to construct a generator pad along the southeast side of the building, construction of the ILA support structures within the building and installation of equipment, trenching for installation of the innerduct, automated testing of the emergency generators, and approximately weekly trips to the site by one vehicle for maintenance and data logging. Site development will not be required as this site will have the equipment installed within an existing building (except for the emergency generator) and utilize existing parking.

Noise will be generated from both construction and operation of the ILA facility. Table 3 provides relevant information on construction and operation activities and equipment contributing to noise. Included is the size of each type of heavy construction equipment and the numbers of hours per day that each piece of equipment will operate. A key assumption implicit in the evaluation of noise impacts is that only one piece of heavy equipment will operate at any one time. Therefore, maximum construction noise levels at each site are based on the noisiest piece of construction equipment. This maximum potential noise (at full engine power) for normally-muffled diesel-powered construction equipment up to 200 horsepower (hp) measured at 50 feet is 84 dBA (U.S. EPA, 1971).

Noise from off-site construction activities, associated with personnel vehicles and material delivery and refuse dump trucks, was not included because all vehicles will travel legally on local streets and state highways and will not remain stationary for a significant period of time to create a noise disturbance. As stated in Section III (Air Quality), site access is generally easy and direct, and traffic will not be blocked on local streets or highways for any significant period of time.

The maximum construction noise level at the closest receptor would be 62 dBA CNEL estimated by adjusting the 84 dBA using the inverse square of the distance between the site and the receptor 120 feet away.

The City of Santa Barbara restricts construction activities to the period 7 AM to 8 PM. Review of the Municipal Code, Section 9.16, revised December 31, 1997, indicates that neither construction nor operational noise at the property line of any adjacent parcel shall not exceed 60 dBA CNEL. Specially muffled sound equipment and portable sound walls will be used to reduce construction noise to less than 60 dBA CNEL on all adjacent parcels. Operational (i.e., generator) noise will be reduced to permissible levels using a noise-insulating generator enclosure. Detailed methodologies, algorithms, and assumptions associated with the noise analysis are provided as Attachment A.

Operational parameters related to noise include the size/gross hp and period of operation (30 minutes/week) of the emergency standby generator (Table 3). The generator will be automatically tested weekly.

Evaluation

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
---	--	---	---	---

The project will not generate noise levels in excess of local standards at the closest receptor during construction because specially-muffled construction equipment will be employed and a portable sound wall will be used as necessary for compliance with the City of Santa Barbara Municipal Code. Level 3 will comply with

local construction-related noise ordinances by restricting construction activities to the period 7 AM to 8 PM. Because construction outside of the existing building will utilize prefabricated structures, the construction period will be the brief, up to two months as shown in Table 3, and noise thresholds will not be exceeded.

To reduce operations noise to less than 60 dBA CNEL, the generator location will be located at least 60 feet from the nearest receptor (across the railroad right-of-way to the southeast, Figure 7), and the generator will be housed in a specially designed enclosure which reduces the noise to 75 dBA at 5 feet. These measures will result in an operational noise level of 55 dBA CNEL and will comply with the City of Santa Barbara threshold limit.

Site Specific Environmental Commitments:

- Level 3 will comply with local construction-related noise ordinances by restricting construction activities to the period 7 AM to 8 PM, and by providing special equipment and sound walls to keep construction noise to below 60 dBA CNEL at nearby receptors; and
- Level 3 will comply with the local operation noise ordinance by providing a noise-insulating generator shelter that reduces noise levels to 75 dBA at a distance of 5 feet from the enclosure, and by locating the generator at least 60 feet from the receptor to the southeast.

b) Would the proposal result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
--	--	---	---	---------------------------------------

Neither project construction or project operations will generate excessive ground borne noise or vibration. The low level ground borne vibration and noise generated during construction will be short term in nature, and generally will not extend more than a few feet from the active work area. This work area will be set back 60 feet from the nearest receptor (to the southeast) as shown in Figure 7. As a consequence of the setback and the limited scope of construction activities, there will be a less than significant impact from ground borne vibrations or noise during construction.

For the operational period, (approximately 30 minutes per week) the generator will cause only localized vibration intermittently. The generator is mounted on a concrete pad and will have a minimum of 4 vibration isolators rated for reducing groundborne vibration more than 95 percent (Ace Mounting Company, Inc. 1999). The 60-foot setback from the nearest receptor provides additional assurance that excessive ground-borne noise or vibration will not be perceived by off site receptors. The buried fiber optic cable will not generate any perceptible vibrations or noise. Consequently, there will be no excessive ground borne vibration or noise impacts from site operations.

c) Would the proposal result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

Construction noise will be temporary, lasting up to two months. Therefore, there will be no permanent increases in ambient noise levels in the vicinity of the site. Noise emitted during the approximately 30 minutes each week to test the generator, and during power outages, will be temporary and below the regulatory threshold.

d) Would the proposal result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
---	--	---	---	---------------------------------------

Temporary increases in ambient noise levels will occur during the up to two months of construction but these will not be significant and will comply with the local construction noise ordinance. Weekly testing for a period of approximately 30 minutes and during power outages and for maintenance activities will generate operational noise. This intermittent noise will not be a substantial increase in ambient noise levels because the increased distance from the boundary with the nearest industrial facility will create a buffer area around the generator (Figure 7) and the location and enclosure of the generator will comply with noise regulations.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The site is not located within an airport land use plan. The site is located approximately 8.5 miles from the Santa Barbara Municipal Airport. Therefore, it would not expose people residing or working in the project area to excessive noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The site is not located within two miles of a private airstrip.

XII. POPULATION AND HOUSING

Setting

The project site is located in the City of Santa Barbara, with a population of 91,900 as of June 1999 (Gudgeon 1999). The project site is developed with one commercial/industrial building and is located in a developed Hotel/Retail/Commercial area. The nearest housing is located approximately one-quarter mile away, south of Chapala Street. There are no local policies for population and housing that apply to the project site.

Evaluation

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The proposed project would not directly or indirectly induce population growth. The project would consist of the reuse of an existing industrial building as an unmanned ILA facility. No full-time employees would be present at the project site upon completion. The proposed ILA facility would be visited approximately weekly by one or two employees for maintenance. No new housing or extension of major infrastructure would result.

b) Would the project displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

No displacement of existing housing units would result from implementation of the proposed project. The project would involve the reuse of an existing industrial building in a developed industrial area.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The project would consist of the reuse of an existing warehouse building and would not displace any people or structures.

XIII. PUBLIC SERVICES

Setting

The project is located within the City of Santa Barbara. Fire and police protection are provided by the City of Santa Barbara. The nearest fire station is located at 121 W. Carrillo Street, approximately 0.7 miles from the project site. The police department is located at 215 E. Figueroa Street, approximately 0.9 miles from the project site.

Public facilities within one mile of the project include Santa Barbara City College, West Beach, and several parks (Ambassador Park, Chase Palm Park, Pershing Park, and Plaza Del Mar Park).

There are no local policies for public services that apply to the proposed project or project site.

Evaluation

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any or the public services: Fire protection? Police protection? Schools? Parks? Other public facilities?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The proposed project involves the reuse of an existing warehouse building in a developed industrial area. The proposed ILA facility would be unmanned and would be visited approximately weekly by one or two employees for maintenance. The project would not result in the need for new or physically altered government facilities nor affect response time and other performance objectives.

XIV. RECREATION

Setting

There are several parks located within one mile of the project site. Pershing and Plaza Del Mar parks are both located within 0.5 miles south of the site. Ambassador Park and Chase Palm Park are located approximately 0.30 and 0.25 miles, respectively, south of the project site. In addition to the public parks in the project vicinity, there are a number of visitor-serving uses such as hotels and restaurants throughout the project area. The project site and surrounding area are zoned for hotel and related commerce in support of visitor serving uses in the coastal area. There are no other local policies for recreation that would apply to the proposed project or project site.

Evaluation

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project involves the reuse of an existing warehouse building for an unmanned ILA facility. The proposed project does not involve residential uses and would not cause an increase in the population. No increase in the demand for, or use of, existing parks or recreational facilities would result from implementation of the proposed project.

b) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant With Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The proposed project involves the reuse of an existing warehouse building for an unmanned ILA facility. The proposed project would not include recreational facilities nor require the construction or expansion of recreational facilities that may have an adverse effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Setting

The project site is bordered on the east by Anacapa Street, which is designated by the City of Santa Barbara General Plan (1998) as a Collector Street. The project is bordered to the west by Helena Avenue which is designated by the City of Santa Barbara General Plan as a Minor Collector. The Southern Pacific Railroad ROW borders the project site to the south.

Both Anacapa Street and Helena Avenue have a Level of Service (LOS) A (Quinoes 1999). LOS A is defined by the (1998) City of Santa Barbara General Plan as having conditions of free unobstructed flow, with no delays and all signal phases sufficient in duration to clear all approaching vehicles.

Helena Avenue is a two-lane street with sidewalks within the project area. A two-way stop is located at the intersection of Helena Avenue and Yanonali Street, north of the project site. There is no through traffic on Helena Avenue at the project site, as there is no railroad crossing. Helena Avenue continues south to Cabrillo Boulevard beyond the railroad ROW.

Anacapa Street is a two-lane street with sidewalks in the project area. A two-way stop is located at the intersection of Anacapa Street and Yanonali Street, north of the project site. A railroad crossing with gates and signals is located at the intersection of the railroad ROW and Anacapa Street, just south of the project site.

Evaluation

a) Would the project cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
--	--	---	---	---------------------------------------

During construction at the site, construction workers will be commuting to the site for approximately three months. The average number of commuting workers is expected to be seven. The workers will commute during off-peak traffic hours (usually 6 a.m. and 3 p.m.) and park on the site. Occasionally, trucks will deliver equipment and materials to the site and haul construction debris from the site to recycling centers or landfills. These truck trips will be infrequent and off-peak from area traffic flows. The offsite impacts from construction are therefore expected to be less than significant. During operation of the site, one service person would visit the site approximately weekly. The project would therefore not result in a permanent increase in traffic load or daily trips because the project site would not be occupied on a daily basis.

b)	Would the project exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The proposed project is the reuse of an existing warehouse building as an unmanned ILA facility. One to two service personnel would visit the site approximately weekly for maintenance. The project would not result in a permanent increase in traffic load or daily trips as the project site would not be occupied on a daily basis.

c)	Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The proposed project would not affect air traffic patterns.

d)	Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The proposed project is the reuse of an existing warehouse building as an unmanned ILA facility. Access to the site would be gained via existing driveways. No changes to the site design are proposed. The existing site design has no hazardous features.

e)	Would the project result in inadequate emergency access?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The project would not affect emergency access routes.

f)	Would the project result in inadequate parking capacity?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The project site has a small parking area by its entrance. The project would be unmanned and visited by service personnel approximately weekly for maintenance. On-site parking capacity is adequate for the proposed use.

g)	Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The City of Santa Barbara Circulation Element contains policies supporting pedestrian and bicycle transportation. These policies do not apply to the proposed project. The project does not conflict with any adopted policies, plans, or programs supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

The project site is developed with an industrial building and is located in a developed industrial area. The project would involve the reuse of the existing building as an unmanned ILA facility. All utilities and service systems are available on-site.

Southern California Edison (SCE) provides electricity to the City of Santa Barbara. The Southern California Gas Company (SCG) provides natural gas to the City. SCG has indicated that it can meet future demands for natural gas in the City (Santa Barbara General Plan 1998).

The City of Santa Barbara Department of Public Works provides solid waste disposal, water supply, and wastewater treatment services.

Solid waste is disposed of at the Tajiguas Sanitary Landfill in unincorporated Goleta. The Tajiguas Landfill has a permitted daily capacity of 1,500 tons and an actual daily load of 742 tons. The landfill has a maximum capacity of 12,000,000 tons of which 748,000 have been used (Santa Barbara General Plan 1998).

El Estero Wastewater Treatment Plant (EEWTP) provides wastewater treatment services to the City of Santa Barbara. The collection system is maintained on a 100-year replacement cycle, with a portion of the system replaced each year (General Plan-Conservation Element 1979). The current inflow at the facility ranges from 8 to 8.5 million gallons per day (mgd). The EEWTP has a maximum capacity of 11 million mgd and is sufficient in meeting the City's needs.

Evaluation

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
---	--	---	--	--

The existing building has restroom facilities that could be used by service personnel during site visits. The project site would not be occupied on a daily basis and would not generate a significant amount of wastewater. The project would not exceed wastewater treatment requirements of the applicable RWQCB.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
--	--	---	--	--

The proposed project would be unmanned and would be visited by one or two service personnel approximately weekly for maintenance. The existing building has restroom facilities, which could be used by ser-

vice personnel during site visits. The project site would not be occupied on a daily basis and would not generate a significant amount of wastewater. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities.

c)	Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The project would not result in increased uses or burdens on stormwater facilities, as the site is already paved and contains a building. On site drainage would not be altered. Thus, the project would not result in the construction of new storm water drainage facilities or expansion of existing facilities.

d)	Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	---	--	---	--	--

The proposed project would be visited by one or two service technicians approximately weekly for maintenance. The project site would not be occupied on a daily basis and would not require a significant amount of water. The project would have sufficient water supplies from existing resources.

e)	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The proposed project would not be permanently staffed and would be visited by one or two service personnel approximately weekly for maintenance. The existing building has restroom facilities which could be used by service personnel during site visits. The project site would not be occupied on a daily basis and would not generate a significant amount of wastewater. The project would not affect the wastewater treatment provider's existing commitments.

f)	Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input checked="" type="checkbox"/>	No Impact <input type="checkbox"/>
----	---	--	---	---	---------------------------------------

The project site would be served by the Tajiguas Sanitary Landfill in unincorporated Goleta, in Santa Barbara County. The Tajiguas Landfill has a permitted daily capacity of 1,500 tons and an actual daily load of 742 tons. The landfill has a maximum capacity of 12,000,000 tons of which 748,000 have been used. The project would be unmanned and would not generate solid waste on a daily basis. The project will generate approximately 120 cubic yards (80 tons) of solid waste, primarily from the demolition of non-load bearing interior walls. Thus, the project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

g)	Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact <input type="checkbox"/>	Less than Significant with Mitigation Incorporation <input type="checkbox"/>	Less than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
----	--	--	---	--	--

The project would involve reuse of an existing warehouse building as an unmanned ILA facility. The project would not generate solid waste on a daily basis. A small amount of construction-related solid waste may result from the packing materials. The project would comply with federal, state, and local statutes and regulations related to solid waste.

Analysis Team

The multidisciplinary team that provided input to this checklist included the following members:

Technical Coordination:

Gary Finni, Ph.D., Aquatic Entomology (22 years experience)
Charles Comiskey, Ph.D., Ecology (23 years experience)
BHE Environmental, Inc.
11733 Chesterdale Road, Cincinnati, OH 45246
Phone: (513) 326-1500 Fax: (513) 326-15650

Engineering:

Tom Ogg, BS, PE, MBA, Civil Engineering (10 years experience)
Kiewit Pacific Company
14203 Denver West Parkway, 1st Floor, Golden, CO 80401
Phone: (303) 215-8768 Fax: (303) 215-8296

Hydrology/Geology/Hazardous Materials:

Bob Hearn, BS, JD, Engineering, Law (25 years experience)
BHE Environmental, Inc.
11733 Chesterdale Road, Cincinnati, OH 45246
Phone: (513) 326-1500 Fax: (513) 326-15650

Chris Dennis, MS, Geology, Law (8 years experience)
Tracy Walker, MS, Geology (8 years experience)
TRC Environmental Corporation
5052 Commercial Circle, Concord, CA 94520
Phone: (925) 688-1200 Fax: (925) 688-0388

Land Use/Aesthetics/Public Utilities/Transportation/Field/Analysis

Susan Robbins, AICP, Director of Environmental Services
Cheryl Kuta, MURP, AICP Certified Planner
Chambers Group, Inc.
17671 Cowan Avenue, Suite 100, Irvine, CA 92614
Phone: (949) 261-5414 Fax: (949) 261-8950

Biological Resources: Field/Analysis

Chris Blandford, BS, Ecology: Systematic Biology
Chambers Group, Inc.
17671 Cowan Avenue, Suite 100, Irvine, CA 92614
Phone: (949) 261-5414 Fax: (949) 261-8950

Biological Resources: Field

John Cleckler, BS, Wildlife Biology
Chambers Group, Inc.
17671 Cowan Avenue, Suite 100, Irvine, CA 92614
Phone: (949) 261-5414 Fax: (949) 261-8950

Noise/Air Quality

Deems Padgett, MS, Engineering, Geology (14 years experience)
TRC Environmental Corporation
5052 Commercial Circle, Concord, CA 94520
Phone: (925) 688-1200 Fax: (925) 688-0388

Noise/Air Quality

Eric Walther, Ph.D., Atmospheric Science (32 years experience)
TRC Environmental Corporation
21 Technology Drive, Irvine, CA 92618
Phone: (949) 727-7315 Fax: (949) 727-7399

Historic & Cultural Resources: Analysis:
Brant Brechbiel, BA, History, MBA (10 years experience)
Roger Mason, Ph.D., Anthropology (20 years experience)
17671 Cowan Avenue, Suite 100, Irvine, CA 92614
Phone: (949) 261-5414 Fax: (949) 261-8950

Paleontologic Resources: Analysis

E. Bruce Lander, Ph.D., Paleontology (25 years experience)
Chambers Group, Inc.
17671 Cowan Avenue, Suite 100, Irvine, CA 92614
Phone: (949) 261-5414 Fax: (949) 261-8950

Architectural History:

FieldGail Miller, MA, Historic Preservation (5 years experience)
Myra L. Frank & Associates, Inc.
811 West 7th Street, Suite 800, Los Angeles, CA 90017
Phone: (213) 627-5376 Fax: (213) 627-6853

Architectural History: Analysis

Richard Starzak, MA, Architectural History, (20 years experience)
Myra L. Frank & Associates, Inc.
811 West 7th Street, Suite 800, Los Angeles, CA 90017
Phone: (213) 627-5376 Fax: (213) 627-6853

Quality Control:

Gary Finni Ph.D. Aquatic Entomology (22 years experience)
BHE Environmental, Inc.
11733 Chesterdale Road, Cincinnati, OH 45246
Phone: (513) 326-1500 Fax: (513) 326-15650

David Augustine, JD, Permitting Specialist (25 years experience)
TRC Environmental Corporation
5052 Commercial Circle, Concord, CA 94520
Phone: (925) 688-1200 Fax: (925) 688-0388

Graphics:

Bill Boynton, MA '99, Geography, (5 years experience)
Parsons Brinckerhoff Network Services
505 South Main, Suite 900, Orange, CA 92868
Phone: (714) 973-4918 Fax: (714) 973-0358

Sources

- 40 CFR Parts 93. *Determining Conformity of Federal Actions to State or Federal Implementation Plans*, July 1998.
- Ace Mountings Company, Inc. Manufacturer's literature for Series 630 Spring Isolators, 1999.
- Adcox, Rachel, Senior Planner, City of Santa Barbara Community Development Department. Interviewed by Sam Stewart, Chambers Group Inc., September 16, 1999.
- Arnold, J.E. Craft Specialization in the Prehistoric Channel Islands, California, *University of California Publications in Anthropology* 18, University of California Press, Berkeley and Los Angeles, 1987.
- Blake, T.F. *Preliminary Fault Data for EQ Fault and FRISKSP*, 1998.
- California Department of Fish and Game (CDFG). *Santa Barbara Quadrangle, California Natural Diversity Database*, September 1999.
- California Division of Mines and Geology (CDMG). *Urban Geology, Master Plan for California*, Bulletin 198, 1973.
- . *Fault Vicinity Map of California and Adjacent Areas*, Map No. 6, 1994.
- . *Probabilistic Seismic Hazard Assessment for the State of California*, Open-File Report 96-08, 1996.
- . *Fault-Rupture Hazard Zones in California*, Special Publication 42, 1999.
- California Environmental Protection Agency (California EPA), Air Resources Board. *California Air Quality Data*, 1996-1998.
- . *Proposed Amendments to the Designation Criteria and Amendments to the Area Designations for State Ambient Air Quality Standards, and Proposed Maps of the Area Designations for the State and National Ambient Air Quality Standards*, August 1998.
- . *Emission Factor Computer Program*, 1998.
- . *Reference Air Quality Database*, 1998 State Area Designations, Accessed at <http://www.arb.ca.gov>, Updated February 1999.
- California Historical Resources Information System, Central Coastal Center. *Records Search for Fiber Optic Cable In-Line Amplifier Station Sites in San Luis Obispo and Santa Barbara Counties*, No File No. Assigned, Information on file, Chambers Group, Inc., March 9, 1999.
- Caterpillar Corporation. *Generator Emissions Guarantee*, 1999.
- Dibblee, T.W., Jr. *Geology of the Central Santa Ynez Mountains, Santa Barbara County, California*, California Division of Mines and Geology Bulletin 186, 1966.
- Glassow, M.A., L.R. Wilcoxon, and J. Erlandson. Cultural and Environmental Change During the Early Period of Santa Barbara Channel Prehistory, In: G. Bailey and J. Parkington (Editors), *The Archaeology of Prehistoric Coastlines*, , pp. 64-77, Cambridge University Press, New York, 1988.
- Grant, C. Chumash: Introduction, In: Robert F. Heizer (Editor), *Handbook of North American Indians*, Vol-

- ume 8, California, pp. 505-508, Smithsonian Institution, Washington, 1978a.
- . Eastern Coastal Chumash. In: Robert F. Heizer (Editor), *Handbook of North American Indians, Volume 8, California*, pp. 509-519, Smithsonian Institution, Washington, 1978b.
- Gudgeon, Rachel, Assistant Planner, City of Santa Barbara Community Development Department. Interviewed by Cheryl Kuta, Chambers Group, Inc., August 30, 1999, and by Sam Stewart, Chambers Group Inc., September 16, 1999.
- Henon, Betty, Senior Planner, City of Santa Barbara, Community Development Department. Interviewed by Cheryl Kuta, Chambers Group Inc., September 21, 1999.
- Integrated Waste Management Board. *Solid Waste Information System, California Waste Facilities, Sites, and Operations Database*, Accessed at <http://www.ciwmb.ca.gov>, Updated September 10, 1999.
- Jefferson, G.T. *A Catalogue of Late Quaternary Vertebrates from California: Part One, Nonmarine Lower Vertebrates and Avian Taxa*, Natural History Museum of Los Angeles County Technical Reports Number 5, 1991a.
- . *A Catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals*. Natural History Museum of Los Angeles County Technical Reports Number 7, 1991b.
- King, C.D. *The Evolution of Chumash Society: A Comparative Study of Artifacts Used in System Maintenance in the Santa Barbara Channel Region Before A.D. 1804*, Ph.D. Dissertation, Department of Anthropology, University of California, Davis, 1981.
- Leider, Abe, Planner, County of Santa Barbara. Interviewed by David Carr, Level 3 Long Haul Project Team, September 7, 1999.
- Mason, R.D., Chambers Group Inc. Written communication to Gail McNulty, Native American Heritage Commission, September 3, 1999a.
- . *Cultural Resources Survey Report and Paleontological Resources Literature Review Report for Level 3 Long Haul Fiber Optic Project: Santa Barbara ILA, in the City of Santa Barbara, Santa Barbara County, California*, Prepared by Chambers Group, Inc., Irvine, CA, Prepared for Level 3 Project Office, Pleasanton, CA, November 1999b.
- McNulty, G., Native American Heritage Commission. Written communication to David White, Level 3 Long Haul Project Team, September 17, 1999.
- Martz, P. *Social Dimensions of Chumash Mortuary Patterns in the Santa Monica Mountains*, Paper presented at The Third California Indian Conference, Santa Barbara, California, 1987.
- Palmer, Beth, Santa Barbara Parks and Recreation. Interviewed by David Carr, Level 3 Long Haul Project Team, September 7, 1999.
- Parsons Brinckerhoff Network Services (PBNS). *Level 3 Long Haul Fiber Optics Project: Cultural Resources Procedures*, July 1999.
- Quinoes, Fabio, Transportation Engineer, City of Santa Barbara Public Works Department. Interviewed by Lisa Chen, Chambers Group Inc., September 14, 1999.
- Rap, Derek, Transportation Engineer, City of Santa Barbara Public Works Department. Interviewed by Lisa Chen, Chambers Group Inc., September 21, 1999.

Rice, Tim, Caterpillar Dealer. Interviewed by David Augustine, TRC, December 27, 1999.

Santa Barbara, City of. *The City of Santa Barbara General Plan, Land Use Element*, July 1964.

----- *Coastal Plan*, May 1981.

----- *Municipal Code, Section 9.16*, December 1997.

----- *General Plan, Circulation Element*, October 1998.

----- *Zoning Ordinances*.

----- *Master Environmental Assessment*, Revised September 1981.

Santa Barbara, County of. *Comprehensive Plan, Seismic Safety and Safety Element*, August 1979, amended October 1991.

Santa Barbara County Air Pollution Control District (SBCAPCD), *Rules & Regulations*, 1989.

----- *Scope and Content of Air Quality Sections in Environmental Documents*, January 1999.

Schomer and Associates. *Proposed Revisions to Property-Line-Noise-Source Measurement Procedures*, Report No. ILENR/RE-EA-91/10, June 1991.

Shelton, Barbara, Environmental Planner, City of Santa Barbara. Interviewed by David Carr, Level 3 Long Haul Project Team, September 7, 1999.

Society of Vertebrate Paleontology. Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines, *Society of Vertebrate Paleontology News Bulletin* 163:22-27, 1995.

----- Conditions of Receivership for Paleontologic Salvage Collections [Final Draft], *Society of Vertebrate Paleontology News Bulletin* 166:31-32, 1996.

South Coast Air Quality Management District (SCAQMD). *CEQA Handbook*, Table A9-8-B, 1993.

Starzak, R. and G. Miller. *Santa Barbara ILA Site Architectural History Survey and Evaluation* Myra L. Frank & Associates, September 13, 1999.

Stratton, Alicia, Air Quality Specialist, Ventura County Air Pollution Control District. Interviewed by Mark Hagmann, ESA, May 3, 1999.

Tartaglia, L.J. *Prehistoric Maritime Adaptations in Southern California*, Ph.D. Dissertation, University of California, Los Angeles, University Microfilms, Ann Arbor, 1976.

United States Environmental Protection Agency (U.S. EPA). *Noise for Construction Equipment and Operations, Building Equipment, and Home Appliances*, Contract 68-04-0047, December 30, 1971.

----- *Compilation of Air Pollutant Emission Factors, AP-42*, Section 3.4, Large Stationary Diesel and All Stationary Dual-Fuel Engines, October 1996.

Vista Information Solutions, Inc. *California Site Assessment Plus Report: Santa Barbara*, August 11, 1999.

----- *NEPA Checklist: Santa Barbara, August 1999.*

Tables

- Table 1 Current and Potential Cumulative Projects in the Vicinity of the Santa Barbara ILA.
- Table 2 Specific Local Policies Applicable to Each Issue Area for the Santa Barbara ILA Site.
- Table 3 Santa Barbara ILA - Construction and Operation Emissions Summary.
- Table 4 Santa Barbara County APCD - Total Project Construction Emissions.
- Table 5 Potential for Habitat at the Santa Barbara ILA Site to Support Sensitive Species Occurring in the Vicinity.

Figures

- Figure 1 Regional Map
- Figure 2 Vicinity Map
- Figure 3 Parcel Map
- Figure 4 U.S.G.S. Quad Sheet
- Figure 5 Surrounding Land Use Map
- Figure 6 Photo Key Map
- Figure 7 Conceptual Plot Plan
- Figure 8 Noise Receptor Map
- Figure 9 Floodplain Map
- Figure 10 Wetlands Inventory Map

Photo Plates

- Photo A West Face (Front) of Building
- Photo B West Face (Front) of Building and Alley Adjacent to Railroad with Access to Anacapa Street
- Photo C View of South Face of Building and Railroad Access to Anacapa Street
- Photo D View of Helena Avenue Looking Northwest

Attachment

Attachment A Methodologies, Algorithms, and Assumptions Used in the Air and Noise Analysis.