Site 14. SANTA BARBARA ILA

Environmental Checklist

ENVIRONMENTAL CHECKLIST

1. Facility Title:
Level 3 Communications Infrastructure Project, 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:
Gary Finni, Level 3 Communications, LLC
6689 Owens Drive, Suite A, Pleasanton, CA 94588
(925) 398-3000

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 feet in size, and has an estimated 15,900 square feet warehouse within it. 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 Union Pacific Railroad (UPPR) Right-of-Way (ROW); a narrow alley runs 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 ROW adjacent to the project is also used for parking. A site location map is provided as Figure 14-1; a plot plan of the site is provided as Figure 14-2. Additional maps and detail are provided in the PEA (PEA, 2000, following p. 14-45)

5. Proponent's Name and Address:
Level 3 Communications, LLC ("Level 3")
1450 Infinite Drive, Louisville, CO 80027
(303) 926-3000

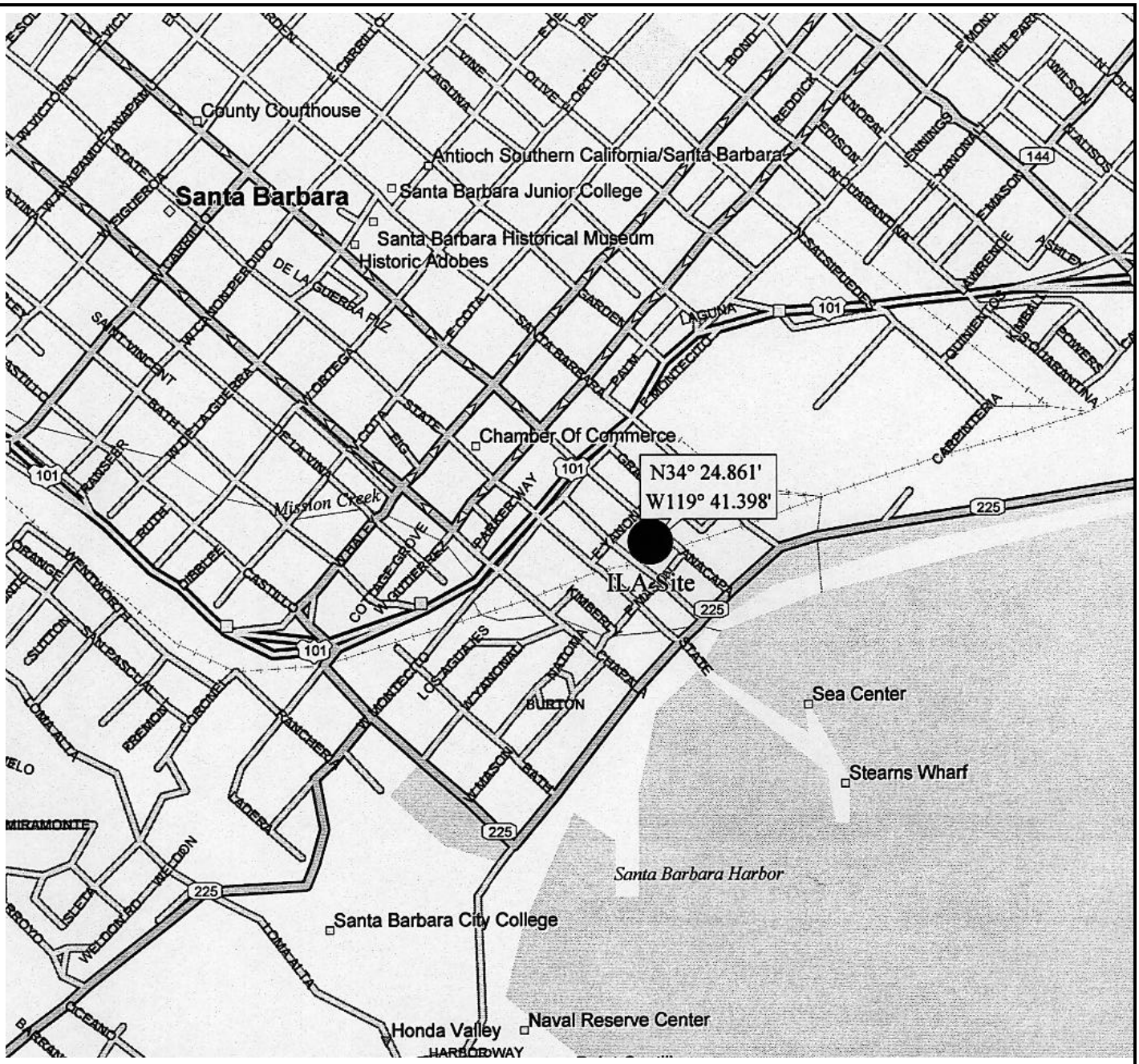
6. General Plan Designation: Hotel/Retail/Commercial (HRC)

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 will be located outside of existing utility corridors.

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. The existing building encompasses approximately 15,900 square feet of the parcel. The building shell will remain intact with the new facility 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.



Scale 1:15,625 (at center)

1000 Feet

500 Meters

Local Road

Major Connector

State Route

Interstate/Limited Access

Exit

Source: PEA,2000

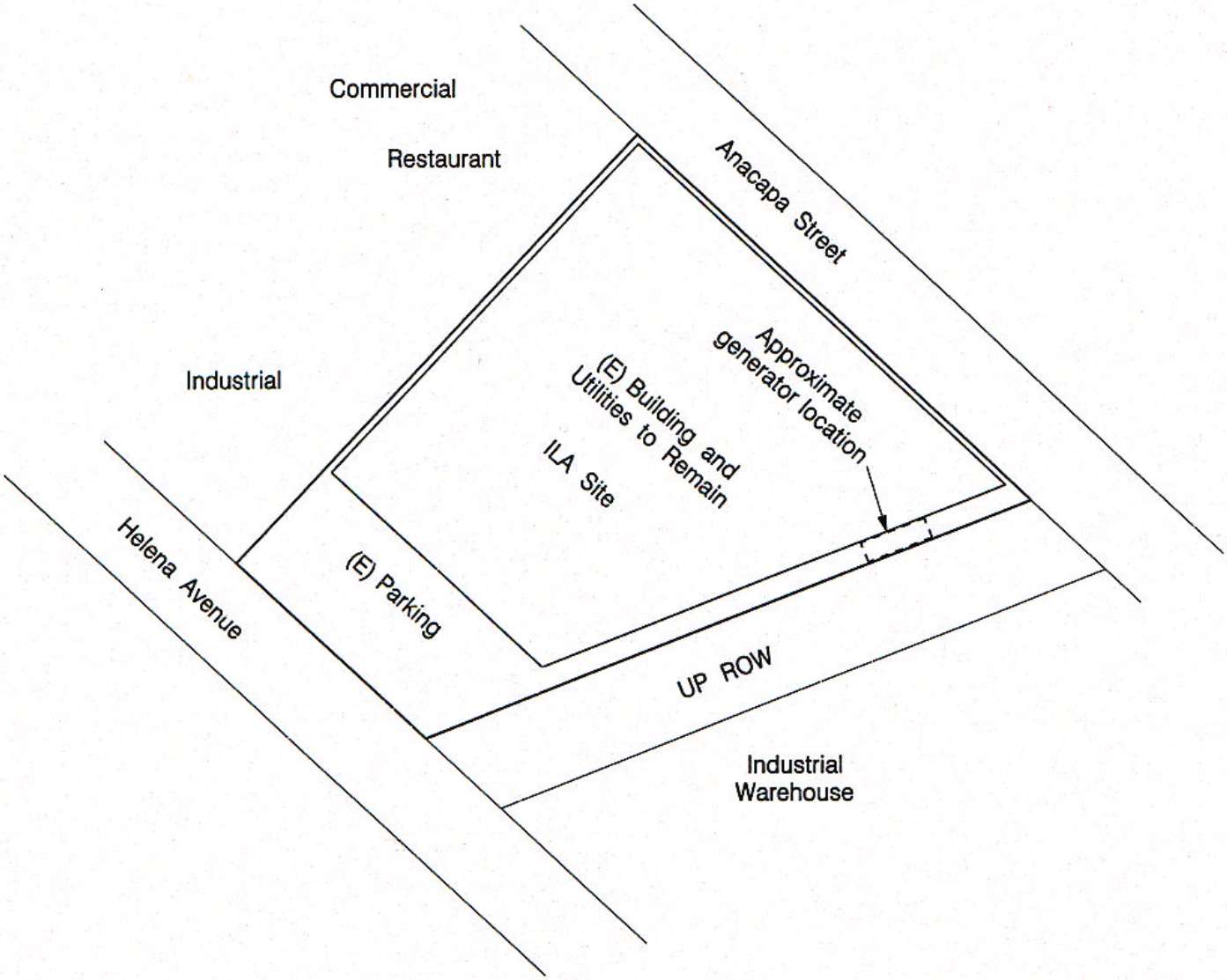
Level 3 Communications Infrastructure Project

Figure 14-1

Santa BarbaraILA Site Vicinity Map

Aspen *EnvironmentalGroup*

ELECTRICAL, TELEPHONE, WATER AND SEWER TO BE DISTRIBUTED EITHER FROM ON-SITE EXISTING OR FROM EXISTING IN STREET PER NEC AND LOCAL CODES (ON-SITE UTILITIES WILL BE DISTRIBUTED UNDERGROUND)



RequiredSetbacks:
Front-30'
Rear-30'
Side-30'

Source: PEA,2000

Level 3 Communications Infrastructure Project

Figure 14-2

Santa BarbaraILA Conceptual Plot Plan

Aspen EnvironmentalGroup

The proposed ILA station will be engineered for the utilization of the available square footage. No prefabricated 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 (PEA, 2000, p. 14-2). 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 to support maintenance activities are available in front of the building facing Helena Avenue.

The Santa Barbara ILA will require electricity and telephone lines. 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 14-2 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 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, 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) is assumed. 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.

Each generator will be equipped 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.

Technical staff will be trained in 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 14-1 of the PEA (PEA, 2000, follows p. 14-45). Criteria for inclusion of a project in the cumulative impact assessment are as follows:

- Projects that are within two miles of the site. In some cases these projects are in more than one jurisdiction
- Projects that are scheduled for construction from one year before to one year after the "construction window" for the project facilities, or between March 1999 to March 2003
- Current projects that include those which have been approved by the lead agency and have had their environmental document signed, approved, and/or certified
- Potential projects 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. Resource-specific baseline settings are provided in Section I – XVI of this checklist.

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 (PEA, 2000, p. 14-3). 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 may be allowed under a 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 14-2 of the PEA (PEA, 2000, follows p. 14-45). 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.

11. Determination:

On the basis of the analysis in this Initial Study, the proposed facility would not have a significant effect on the environment because all potential impacts have been mitigated to a level of less than significant through either (1) the additional mitigation measures recommended in this Checklist, or (2) the Environmental Commitments described below.

The proposed facility is an element of the project addressed in a Petition to Modify 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. The project will incorporate all of the mitigation measures outlined in the previous Decision, as well as those of this environmental review, into its design and construction of the project. 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
- 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
- Documentation and reporting of compliance.

A complete list of mitigation measures from the previous Negative Declaration is provided in Appendix B of the PEA (PEA, 2000, Volume 3).

I. AESTHETICS

Setting

The site is located in an urban landscape dominated by built structures and infrastructure. Existing visual quality is rated low to moderate, viewer sensitivity is rated moderate given the site's close proximity to downtown, and viewer exposure is rated moderate. Visual absorption capability is rated high since the proposed project will be installed in an existing building (see the Visual Analysis Data Sheet at the end of this Initial Study). The proposed project will minimally alter the existing building exterior appearance and visual features. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no visual contrast is expected, no significant visual impacts are anticipated, and no mitigation measures are recommended. Figure 14-I-1 shows the location of the Key Viewpoint from which the Visual Analysis Data Sheet was developed. Figure 14-I-2 shows the view from the Key Viewpoint. These figures are found at the end of this Initial Study. Also, see PEA Photos 14-A through D for additional views.

Evaluation

a)	Would the project have a substantial adverse effect on a scenic vista?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. The project site is not located within the viewshed of a scenic vista. The project will result in only minor changes to the existing building's exterior appearance and visual character as viewed from State Street, Anacapa street, and Helena Avenue.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The site is not located on, or in close proximity to, scenic resources such as trees or rock outcroppings. The project is not visible from a scenic highway. See also a) above.

c)	Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. Existing views of the site encompass an urban setting of industrial, commercial, and office development; paved surfaces; and infrastructure. Since project construction will only involve interior renovation of an existing building, visual absorption capability is considered high. The proposed project would not significantly change the existing visual character or quality of the site or surroundings.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. No new sources of exterior lighting are proposed. Therefore, the project would not adversely affect day or nighttime views in the area or create glare.

II. AGRICULTURAL RESOURCES

Setting

The site is located in a developed urban area. The General Plan designation is "Hotel/Retail/Commercial" and the Zoning designation is "Hotel and Related Commerce." The site does not hold any special agricultural designations and is not currently used for agricultural purposes. The site currently contains a 15,900 square-foot warehouse. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant agricultural impacts are anticipated as a result of project implementation.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. The site is not located on land designated as Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. Therefore, the proposed project would not result in the conversion of such farmland to non-agricultural uses.

b)	Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact**.** The site is not zoned for agricultural use nor is the site under a Williamson Act contract.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. The site is a developed urban parcel and does not retain properties of significant agricultural value (see [a] and [b] above). Project construction would result in the continuation of a developed site, and would not result in the conversion of farmland or significant agricultural potential to a non-agricultural use.

III. AIR QUALITY

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. There are a number of industrial and commercial establishments located adjacent to and within 105 feet of the site. The distance of the closest sensitive receptor to the boundary of the site is 650 feet.

The Santa Barbara County Air Pollution Control District (SBCAPCD) is the consulting agency responsible for determining thresholds of significance for air quality impacts at the proposed Santa Barbara ILA location. For evaluating construction-phase impacts under CEQA, SBCAPCD recommends that significance should be based on a consideration of the control measures to be implemented. If appropriate mitigation measures are implemented, then the impact may be considered less than significant. No quantitative thresholds of significance apply to construction projects. SBCAPCD does provide quantitative thresholds of significance for operational-phase impacts. Operation of a project would trigger a significant impact if associated emissions from all project sources (both stationary and mobile) are equal to or over 240 lbs/day for ROC or NOx, or equal to or above 80 lb/day for PM10. There are no daily operational thresholds for CO (CO is an attainment pollutant). In addition, a significant impact would be triggered if 25 lbs/day or more of NOx or ROC are generated form motor vehicle trips only. 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.

Evaluation

a)	Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact ☐	Less than Significant With Mitigation Incorporation ☒	Less than Significant Impact ☐	No Impact ☐

a) Less Than Significant with Mitigation Incorporation. Given the small scale of the construction and its temporary nature, project construction would not significantly affect regional ozone concentrations. Because there are no quantitative thresholds of significance for construction-related engine or fugitive dust emissions, it is assumed that through the proper implementation of the required SBCAPCD mitigation measures for construction activities, the project would not conflict with or obstruct implementation of the applicable air quality plan.

Level 3 will implement 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.
- 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.

Although these measures would reduce potential impacts to Air Quality, more specific mitigation measures as outlined in Santa Barbara County Air Pollution Control District's ~~*Scope and Content of Air Quality Sections in Environmental Documents*~~ are recommended. As such, the following additional mitigation measures are recommended for implementation.

Mitigation Measure 14-III-1 (PM10):

- Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of duct off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading for the structure.

Mitigation Measure 14-III-2 [Ozone Precursor (NOx and ROC)]:

- Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) should be utilized wherever feasible.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number are operating at any one time.
- Construction equipment shall be maintained in tune per the manufacturer's specifications.
- Construction equipment operating on site shall be equipped with two to four degree engine timing retard or precombustion chamber engines.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- Diesel catalytic converters shall be installed, if available.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch on site.

With regard to operations, generator testing and the visiting technician vehicle would contribute operational air emissions as shown in Table 14-III-1 (PEA, 2000, Table 14-3). The generator would 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 would be in compliance with the requirements of Rule 333 because it would be operated less than 200 hours per year, will not be used in conjunction with any utility voluntary demand reduction program, and would be fully documented with regard to duration of use.

TABLE 14-III-1 AIR QUALITY CALCULATIONS

Construction Engine Emissions

SOURCE	SIZE / GROSS HP	DAILY AMOUNT (1) (hrs or trips)	NUMBER OF DAYS	NUMBER OF UNITS	ONE-WAY DISTANCE (miles)	NO_x EF (2)	NO_x Daily (lbs/day)	NO_x Total (tons)	ROC EF (2)	ROC Daily (lbs/day)	ROC Total (tons)	PM_{10} EF (2)	PM_{10} Daily (lbs/day)	PM_{10} Total (tons)	SO_x EF (2)	SO_x Daily (lbs/day)	SO_x Total (tons)	CO EF (2)	CO Daily (lbs/day)	CO Total (tons)	NOTES
Site Grading (11 cy)																					
Backhoe Loader	200	1	1	1	-	2370	5.2	0.0026	180	0.4	0.0002	15	0.03	0.0000	135	0.30	0.0001	205	0.5	0.0002	6
Vac Truck	153	2	1	1	-	1660	7.3	0.0037	110	0.5	0.0002	15	0.07	0.0000	105	0.46	0.0002	110	0.5	0.0002	6
Surveying Lt-Heavy Duty Truck	117	3	1	1	-	780	5.2	0.0026	72	0.5	0.0002	44	0.29	0.0001	85	0.56	0.0003	105	0.7	0.0003	6
Lt-Heavy Duty Truck	10 cu yd	1	1	1	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Worker Light Truck	175	1	1	1	30	18.4	2.4	0.0012	4.4	0.6	0.0003	0.84	0.11	0.0001	0.31	0.04	0.0000	35	4.6	0.0023	6
Equipment Delivery Truck	Low boy	3	1	-	30	11.3	4.5	0.0022	2.2	0.9	0.0004	0.59	0.23	0.0001	0.31	0.12	0.0001	14.0	5.6	0.0028	7
Worker Light Truck	Light	2	1	-	30	1.0	0.3	0.0001	0.35	0.1	0.0000	0	0.00	0.0000	0.06	0.02	0.0000	7.22	1.9	0.0010	7
Maxima and Subtotals (Site Grading)							16.0	0.0132		2.3	0.0016		0.71	0.0004		0.78	0.0008		14.6	0.0078	
Interior Construction (120 cu.yds.)																					
Semi-end Dump Trucks	20 ton	2	3	-	100	11.3	9.9	0.0149	2.2	1.9	0.0029	0.59	0.52	0.0008	0.31	0.27	0.0004	14.0	12.4	0.0186	7
Worker Light Truck	Light	12	3	-	30	1.00	1.6	0.0024	0.35	0.6	0.0008	0	0.00	0.0000	0.06	0.10	0.0001	7.22	11.5	0.0172	7
Maxima and Subtotals (Demolition)							11.5	0.0173		2.5	0.0037		0.52	0.0008		0.37	0.0006		23.8	0.0358	
Pad Construction (11cy)																					
Cement Truck	10 yd3	1	1	-	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Gravel Truck	10 yd3	1	1	-	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Worker Light Truck	Light	2	1	-	30	1.00	0.3	0.0001	0.35	0.1	0.0000	0	0.00	0.0000	0.06	0.02	0.0000	7.22	1.9	0.0010	7
Maxima and Subtotals (Pad Construction)							3.2	0.0016		0.7	0.0003		0.16	0.0001		0.10	0.0000		5.6	0.0028	
Trenching & Utility Installation (350cy)																					
Excavator	84	8	12	1	-	774	13.6	0.0819	64	1.1	0.0068	13	0.23	0.0014	58	1.02	0.0061	79	1.4	0.0083	6
Equipment Delivery Truck	Low boy	1	2	-	30	11.3	1.5	0.0015	2.2	0.3	0.0003	0.59	0.08	0.0001	0.31	0.04	0.0000	14.0	1.9	0.0019	7
Worker Light Truck	Light	2	12	-	30	1.00	0.3	0.0016	0.35	0.1	0.0006	0	0.00	0.0000	0.06	0.02	0.0001	7.2	1.9	0.0115	7
Maxima and Subtotals (Trenching and Utility Installation)							15.4	0.0850		1.5	0.0076		0.31	0.0015		1.08	0.0062		5.2	0.0216	
Shelter Placement																					
Crane	150 ton	2	1	1	-	576	2.5	0.0013	82	0.4	0.0002	64	0.28	0.0001	41	0.18	0.0001	1624	7.2	0.0036	8
Equipment Delivery Truck	Low boy	1	1	-	150	11.3	7.4	0.0037	2.2	1.5	0.0007	0.59	0.39	0.0002	0.31	0.21	0.0001	14.0	9.3	0.0046	7
Worker Light Truck	Light	2	1	-	30	1.00	0.3	0.0001	0.35	0.1	0.0000	0	0.00	0.0000	0.06	0.02	0.0000	7.2	1.9	0.0010	7
Maxima and Subtotals (Shelter Placement)							10.2	0.0051		1.9	0.0010		0.67	0.0003		0.40	0.0002		18.4	0.0092	
General Construction Activities																					
Compactor	<25 hp	1	1	1	-	8	0.0	0.0000	227	0.5	0.0002	1.4	0.00	0.0000	0	0.00	0.0000	6350	14.0	0.0070	8
Equipment Delivery Truck	Low boy	1	1	-	30	11.3	1.5	0.0007	2.2	0.3	0.0001	0.59	0.08	0.0000	0.31	0.04	0.0000	14.0	1.9	0.0009	7
Construction Generator	<50 hp	8	12	1	-	0.02	0.0	0.0000	0.002	0.0	0.0000	0.001	0.00	0.0000	0.00	0.00	0.0000	0.01	0.0	0.0000	8
Water Truck	4500 gal.	1	2	-	30	11.3	1.5	0.0015	2.2	0.3	0.0003	0.59	0.08	0.0001	0.31	0.04	0.0000	14.0	1.9	0.0019	6
Worker Light Truck	Light	1	17	-	30	1.0	0.1	0.0011	0.35	0.0	0.0004	0	0.00	0.0000	0.06	0.01	0.0001	7.2	1.0	0.0081	7
Maxima and Subtotals (General Construction)							3.1	0.0034		1.1	0.0011		0.16	0.0001		0.09	0.0001		18.7	0.0179	
Maxima and Subtotals, Construction Engine Emissions [3]							16.0	0.1255		2.5	0.0154		0.71	0.0032		1.08	0.0080		23.8	0.0951	
Total Construction Emissions (Fugitive plus exhaust)								0.1255			0.0154		13.13	0.1317			0.0080			0.0951	
Construction Thresholds							N/A	N/A		N/A	N/A		N/A	N/A		N/A			N/A	N/A	
Insignifigant Impact [9]							N/A	N/A		N/A	N/A		N/A	N/A		N/A			N/A	N/A	

Construction Fugitive Dust Emissions

SOURCE	DAILY AMOUNT (hours)	DAYS OF ACTIVITY	AREA OF GRADING / TRENCHING	PM_{10} EMISSIONS EF	PM_{10} EMISSIONS (daily lbs)	PM_{10} EMISSIONS (total tons)	NOTES
Gutting of Building Interior	8	3	0.27 acres	39.4 lb/acre-day	11	0.016	12
Access Road Use	8	17	0.23 acres	39.4 lb/acre-day	9.1	0.077	13
Trenching - Cable Installation	8	12	-	0.51 lb/hr	4.1	0.024	
Wind Erosion	24	12	0.29 acres	6.6 lb/acre-day	1.9	0.011	11
Subtotal, Construction Fugitive Emissions [3]					12	0.13	15
Total PM10 Construction Emissions (Engine Exhaust and Fugitive) [3]						0.13	

(Continued)

Operation Emissions [4]

SOURCE	SIZE / GROSS HP	DAILY AMOUNT (hours)	DAYS OF ACTIVITY	NUMBER OF UNITS	ONE-WAY DISTANCE (miles)	NO_x EF (g/hr) [2]	NO_x Daily (lbs/day)	NO_x Annual (tons/year)	ROC EF (g/hr) [2]	ROC Daily (lbs/day)	ROC Annual (tons/year)	PM_{10} EF (g/hr) [2]	PM_{10} Daily (lbs/day)	PM_{10} Annual (tons/year)	SO_x EF (g/hr) [2]	SO_x Daily (lbs/day)	SO_x Annual (tons/year)	CO EF (g/hr) [2]	CO Daily (lbs/day)	CO Annual (tons/year)	NOTES
Emergency Generator	337	0.5	60	1		2,325	2.6	0.08	337	0.37	0.011	135	0.15	0.004	313	0.35	0.010	2,865	3.2	0.09	6,14
	(300 KW)																				
Worker Light Truck	Light	-	60	1	30	1.0	0.13	0.004	0.35	0.05	0.001	0	0	0	0.06	0.01	0.0002	7.2	0.96	0.03	7
Total Operation Emissions [5]							2.70	0.08		0.42	0.013		0.15	0.004		0.35	0.011		4.1	0.12	
Operation Thresholds							Exempt			Exempt			Exempt			Exempt			Exempt		
Insignifigant Impact [10]							Yes			Yes			Yes			Yes			Yes		

'- = Not applicable

Unit abbreviations: g/hr = grams per hour, lb/day = pounds per day, tpy = tons per year, tpq = tons per quarter

(1) Daily amount is measured in hours for off-road construction equipment (e.g., grader), and in number of trips for on-road vehicles (e.g., worker light-truck).

(2) Emission factors are in grams per hour for off-road equipment, and in grams per mile for on-road vehicles.

(3) Construction engine emission subtotals are for the complete project. Major pieces of construction off-road equipment (e.g., grader, dozer) are used consecutively, not concurrently.

(4) Operation and construction will not occur simultaneously, and hence, the emissions are not additive.

(5) Operational emission totals are for the project. Only one generator will be tested on a single day.

(6) Emission factors are from Caterpillar Corp.

(7) EMFAC7G Emission Factors (1998, 15mph, 75^{0}F)

(8) SCAQMD CEQA Handbook, Table A9-8-B

(9) Construction emissions have insignifigant impact when no emission of a major piece of off-road equipment exceeds threshold (i.e., major pieces are used consequently, not concurrently).

(10) Operation emissions have an insignificant impact if emergency generators are exempt from regulatory limits or if no regulations apply.

(11) Number of days subject to wind erosion equal to days for trenching.

(12) Area to be graded is sum of 115-foot by 66-foot fenced compound and 10-foot wide perimeter band.

(13) Access road assumed to be 1000 ft long and 10 ft wide.

(14) The 25-minute test cycle will be conducted mostly at 50 percent load. To be conservative, the horsepower is stated and emissions are calculated at 75 percent load.

(15) Daily construction fugitive emissions includes the specific activity plus wind erosion.

the ozone precursors NO_x and ROC are extremely small in relation to total district emissions. The project's emissions would not be cumulatively considerable in comparison to total emissions in Santa Barbara County. Therefore, the project's contribution to any regional or local cumulative effect would 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 ☐

d) Less Than Significant Impact. 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, 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 would take place primarily within an existing building. Therefore, receptors associated with surrounding uses would be buffered from the effects of project construction. 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 would be kept below a level of significance.

With regard to operations, the emergency generator would produce operation emissions during testing and power outages. Two factors prevent these emissions from significantly affecting sensitive receptors. First, the generator would not be located in close proximity to sensitive receptors due to the establishment of buffer zones where development would be excluded. Second, generator usage would be restricted to approximately 30 minutes per week.

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 ☒

e) No Impact. The project would not include activities that create objectionable odors.

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 ☒

a) No Impact. No habitat occurs on site 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, March 2000) and knowledge of the project area. Table 14-IV-1 includes these species and their potential for occurrence on site.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. 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 on site, 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 on site or in the immediate vicinity. Therefore, the project is not expected to have any impact on the above 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 ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. 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 on site. No impact to wetlands will result from the proposed project.

Table 14-IV-1
Potential for Habitat at the Santa Barbara ILA Site to Support Sensitive Species Occurring in the Vicinity

The Santa Ynez false-lupine (*Thermopsis macrophylla*) is a federal species of concern and California state rare species with a CNPS listing of 1B. This species is a perennial herb that blooms between the months of April and June. The Santa Ynez false-lupine generally occurs within chaparral communities and in disturbed open areas such as fuel breaks. Studies have shown that it seems to germinate well after fire disturbance. *This site is entirely developed and lacks suitable habitat for Santa Ynez false-lupine.*
The Santa Barbara morning-glory (*Calystegia sepium* ssp. *binghamiae*) has a CNPS listing of 1B and is a perennial herb blooming between the months of April and May. This herb is generally found at low elevations in coastal marshes. However, the subspecies may be extinct. *This site is entirely developed and lacks suitable habitat for Santa Barbara morning-glory.*
*The Sonoran maiden fern (*Thelypteris puberula *var.* sonorensis*) is a CNPS list 2 species perennial herb. It blooms from January to September and is usually found along streams and seepage areas located in and around meadows and riparian forests.* *This site is entirely developed and lacks suitable habitat for Sonoran maiden fern.*
The Late-flowered mariposa lily **(***Calochortus weedii* var. *vestus*) is a federal species of concern with a CNPS listing of 1B. This species is a perennial herb generally occurring in dry, open coastal woodland and chaparral communities within serpentine soils. It typically blooms between the months of June and August. *This site is entirely developed and lacks suitable habitat for late-flowered mariposa lily.*
Coulter's saltbush (*Atriplex coulteri*) has a CNPS listing of 1B. This species is a generally occurs in coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland communities. This site is entirely developed and lacks suitable habitat for Coulter's saltbush.
Davidson's saltscale (*Atriplex serenana* var. *Davidsonii*) has a CNPS listing of 1B. This species is a generally occurs in coastal bluff scrub and coastal scrub communities. This site is entirely developed and lacks suitable habitat for Davidson's saltscale.
Monarch butterfly (*Danaus plexippus*) has no listing but its winter roost sites are considered sensitive habitat by the CDFG. These roost sites include groves of eucalyptus, Monterey pine, and cypress trees. *The site does not include stands of trees necessary for monarch butterfly roosting habitat.*
The tidewater goby *(Eucyclogobius newberryi)* is a federally proposed for delisting north of Orange county and a is California state species of concern found in brackish water habitats along the southern California coast. The tidewater goby is found in shallow lagoons and lower stream reaches. *This site has no aquatic habitat for the tidewater goby.*

Source: California Department of Fish and Game (CDFG). *Santa Barbara Quadrangle, California Natural Diversity Database,* March 2000.

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 ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. 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 ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

e) No Impact. The City of Santa Barbara requires a permit for tree removal from the City Arborist for all trees planned to be removed within the city. 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 (PEA, 2000, p. 14-5).

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 ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

f) No Impact. 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 (PEA, 2000, p. 14-5).

V. CULTURAL RESOURCES

Setting

The property is located at 122 Helena Avenue adjacent to the Union Pacific Railroad in central Santa Barbara. A reinforced concrete warehouse occupies most of the property, while the rest of the property is paved. The project area is located in the region occupied by the Chumash when the first Spanish land expedition passed through the area in A.D. 1769.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

a) and b) Less Than Significant Impact. An archival record search was completed for the site and area within a one-mile radius by the California Historical Resources Information System (CHRIS), Central Coastal Center, UC Santa Barbara. The search also included a check of the California Office of Historic Preservation Historic Property Data File for Santa Barbara County, the National Register of Historic Places (listings and eligibility determinations), California Points of Historical Interest, California Register of Historical Resources, and California Historical Landmarks. The records search reported that the property had not been previously surveyed (File No. Not Provided) and that there are 15 previously recorded prehistoric and historic archaeological sites within one mile of the project. All of the sites are unevaluated for inclusion on the California Register of Historical Resources. Twenty-six historical properties are within a one-quarter mile of the project. Ten of these properties are National Register eligible; five appear eligible; and, three "may become" eligible. Eight do not appear eligible.

The State of California Native American Heritage Commission (NAHC) completed a search of the NAHC Sacred Lands file with negative results and identified locally knowledgeable Native Americans for follow-on contact/consultation. These individuals were contacted, and no response has been sent to Level 3 as of March 14, 2000.

The field inventory noted no exposed ground surface on the parcel and a structure more than 50 years old is present on the property. The facility will be installed inside this existing building.

The building is a Spanish Colonial Revival style warehouse constructed in 1920 that appears to meet the criteria for the National Register of Historic Places and the California Register of Historical Resources. The building is included in the ~~*Architectural and Historic Resources Survey of the City of Santa Barbara*~~. 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. 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.

Level 3 has committed to following 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 (~~*36 CFR § 67.7*~~) to ensure that any alterations to the property required for the proposed project would not compromise the eligibility of the resource for the California Register of Historical Resources. Level 3 will follow any additional recommendations from the City's Historic Landmarks Commission, if required.

c)	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

c) Less Than Significant Impact. The project site is underlain by Quaternary alluvium (unit Qal). No fossil sites are located within this geologic unit on the project or it's vicinity. However, there is a potential for late Pleistocene and early Holocene continental vertebrate and land plant fossils and marine vertebrate and invertebrate remains occurring in the subsurface of the site. It is unlikely that the preconstruction-related earth moving activities will extend to a great enough depth to encounter remains old enough to be considered fossilized (PEA, 2000, p, 14-19).

Level (3) has committed to the following mitigation measure to minimize potential impacts:

Paleontological monitoring will be initiated when earth-moving activities extend 5 feet below current grade. Paleontological monitoring will be conducted by a qualified vertebrate paleontologist to allow for recovery of larger fossil remains and rock samples will be processed to allow for the recovery of smaller fossil remains. All recovered fossil remains will 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 will prepare a final report of findings that includes an inventory of recovered fossil remains. These measures would be in compliance with the Society of Vertebrate Paleontology Guidelines for the management of paleontologic resources and for the museum's acceptance of a monitoring program for fossil collection.

d)	Would the project disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. The CHRIS records search and field survey provided no evidence of the presence of human remains. If suspected human remains are encountered during construction, operations will stop until the proper official is notified, the find evaluated, any mitigation recommendations implemented, and Level 3 has been cleared to resume construction in the area of the find (see ~~*Level 3 Long-Haul Fiber Optics Project Cultural Resources Procedures*~~ (PBNS, 1999:25-39)).

VI. GEOLOGY AND SOILS

Setting

The site is on an alluvial plain south of the east-west trending Santa Ynez Mountains. The plain is essentially flat and slopes southeast toward the Pacific Ocean at a gradient of approximately 100 feet per mile. The project site is within a seismically active region. Principal faults that may generate significant seismic shaking include the Santa Ynez fault, the Mission Ridge Fault System, the Mesa fault, the Red Mountain fault, the Ventura-Pitas Point fault, and the San Andreas fault. The Santa Ynez, Red Mountain, Ventura-Pitas Point, and San Andreas faults have demonstrated Holocene activity (last 11,000 years). Although the Mission Ridge is only classified as potentially active (movement within the last 700,000 years).

The site is not located within an Alquist-Priolo zone, or an area susceptible to landslides and/or erosion. Previous studies in the area (GTC, 1986), suggest that liquefiable materials consisting of saturated, fine-grained sands may underlie the site. The project area is mapped as having highly expansive soil (CDMG, 1973).

Issue Area Analysis

		Potentially Significant Impact	Less than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a)	Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	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?				

a) Less than Significant Impact. The project site is not located within or near an Alquist-Priolo zone (CDMG, 1999). Previous studies in the area (GTC, 1986), suggest that liquefiable materials consisting of saturated, fine-grained sands may underlie the site. The project area is susceptible to severe to moderate magnitude groundshaking (Blake, 1998; CDMG, 1973). The major active faults in the vicinity of the project site and their approximate distance from the project site are as follows:

- Mission Ridge, 2 miles;
- Red Mountain, 4 miles;
- Santa Ynez, 6 miles;
- Ventura-Pitas Point; 11 miles and
- the San Andreas, 40 miles (Blake, 1998).

Accordingly, building and structural design should meet Uniform Building Code-Zone 4 Seismic Standards, and any and all local building and seismic codes to minimize potential seismic hazards. The site is located in an area with little to no landslide hazard (CDMG, 1973).

b)	Would the project result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The project area is relatively flat and paved. It is in an area designated as having low erosion activity (CDMG, 1973).

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. The project site is relatively flat and is not located in an area with unstable soil or geologic units.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. The soil in the project area is mapped as predominantly highly expansive (CDMG, 1973). Proper design of new foundations and reengineering of existing foundations in compliance with state and local building codes would minimize any potential impacts.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

e) No Impact. Although the facility would not be occupied, existing municipal sewer would be retained for disposal of wastewater.

VII. HAZARDS AND HAZARDOUS MATERIALS

Setting

Review of a database of regulatory agency recognized hazardous waste sites revealed no potentially contaminated sites at or within one mile of the project site (Vista, 1999). Fuel for the backup generator would be stored in an aboveground tank. There are no schools located within one-quarter mile of the site. There are no airports located in the vicinity of the project 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. The Proponent will handle and store hazardous materials on site in compliance with applicable federal, state, and local regulations to minimize any potential impact.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. Leak monitoring and spill containment features planned for the on-site aboveground fuel storage tank minimize the risk of hazardous substance release through foreseeable upset or accident conditions.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. No schools or proposed schools are located within one-quarter mile of the project 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. The project site is not included on a list of regulatory agency recognized hazardous materials sites (Vista, 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

e) No Impact. The project site is not located within 2 miles of an airport or within an airport land use plan.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

f) No Impact. There are no private airstrips within the vicinity of the project site.

g)	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

g) No Impact. Redevelopment of this site for use as an ILA facility would not alter, impair, or interfere with adopted emergency response and evacuation plans.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

h) No Impact. The site is not located in the vicinity of any wildland areas, and would not be subject to wildland fires.

Level 3 has already committed to equip generators with spark arrestors.

VIII. HYDROLOGY AND WATER QUALITY

Setting

The facility is to be constructed within an existing building. The existing building is located within a 100-year floodplain (PEA, 2000, Figure 14-9).

Level 3 has already committed to taking the following actions to ensure that hydrology/water quality impacts are minimized during construction and operation of this site. The actions will be applied as appropriate. Details regarding these actions have been provided (PEA, 2000, Appendix E, Volume 3).

- 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.

Level 3 has already committed to submit a Notification of Intent (NOI) to the applicable RWQCB and the State Water Resources Control Board for construction of the site under the General Storm Water Permit to Discharge Storm Water Associated With Construction Activity. The Storm Water Pollution Prevention Plan (SWPPP) will include the following: 1) Project Description; 2) Best Management Practices for Storm Water Pollution Prevention; 3) Inspection, Maintenance, and Record Keeping; and 4) Training.

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 ☒

a) No Impact. Proposed construction, operation, and waste disposal activities are to be performed 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The project will not involve groundwater extraction. Net impermeable area will not be increased on the site, so groundwater recharge will not be impacted.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. The project involves construction within an existing building. No site grading is anticipated nor will there be any net change in impervious surfaces. Thus, no changes in erosion or siltation characteristics on or off site are expected.

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 that would result in flooding on or off site?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. The project involves construction within an existing building. No site grading is anticipated nor will there be any net change in impervious surfaces. Thus, no changes in storm water drainage characteristics are expected.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

e) No Impact. No site grading is anticipated nor will there be any net change in impervious surfaces. The project involves construction within an existing building, so no net change in the amount and characteristics of runoff is expected.

f)	Would the project otherwise substantially degrade water quality?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

f) No Impact. The facility will be placed in an existing building within a developed commercial area. Proposed construction practices are expected to minimize impacts to water quality to the less than significant level.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

g) No Impact. The project does not include housing.

h)	Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

h) Less Than Significant Impact. The project is located within a 100-year floodplain (PEA, 2000, Figure 14-9). However, the project will be constructed within an existing structure, so the project will not result in a significant change to the existing situation.

Level 3 has already committed to the following mitigation measures to minimize potential impacts. 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

i) Less Than Significant Impact. Some risk of flooding is present at the project, but people would be present only during project construction and maintenance, and therefore the risk of injury or death is considered less than significant.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

j) Less Than Significant Impact. Inundation by seiche or mudflow is not considered likely at the project site (PEA, 2000, p. 14-28). The project would be constructed within an existing building, at a location where inundation due to tsunami is possible (PEA, 2000, p. 14-28). However, people would be present only during project construction and maintenance, and therefore the risk of injury or death is considered less than significant.

IX. LAND USE PLANNING

Setting

The proposed site is located at 122 Helena Avenue in the City of Santa Barbara. The general project vicinity is urban with a mix of industrial, commercial, and office development. The 17,000 square-foot site is presently occupied by a 15,900 square-foot warehouse that is proposed to be renovated for occupancy by the ILA. The site is bordered by Helena Avenue on the southwest with commercial uses across the street, a warehouse and restaurant on the northwest, and industrial uses on the northeast and

southeast. See Figure 14-1 in this Initial Study and PEA Figures 14-1 through 8 for locator and vicinity maps.

The General Plan land use designation for the project site is "Hotel/Retail/Commercial (HRC)" while the Zoning designation is "Hotel and Related Commerce-2/S-D-3 (Coastal Zone)." The existing warehouse is a non-conforming use in the HRC-2 zoning district. However, the Zoning Ordinance (section 28.87.030(E)) allows for the changing of a non-conforming use to another non-conforming use provided the new use is similar in intensity of development. The proposed use change would also qualify for a Coastal Development Permit Exclusion. Therefore, the project is not anticipated to conflict with any adjacent uses and is considered consistent with the General Plan and Zoning Ordinance. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant land use impacts are anticipated. See Figure 14-1 in this Initial Study and PEA Figures 14-5, 7, and 8 for locations of adjacent uses.

Evaluation

a)	Would the project physically divide an established community?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. The project site is already developed. The proposed project would reuse the existing building and its location would not divide elements of the local 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The General Plan land use designation for the project site is "Hotel/Retail/Commercial (HRC)" while the Zoning designation is "Hotel and Related Commerce-2/S-D-3 (Coastal Zone)." The project could be allowed as a change from one non-conforming use to another non-conforming use under the City's Zoning Ordinance (section 28.87.030(E)) and would qualify for a Coastal Development Permit Exclusion. Therefore, the proposed project is not expected to conflict with any applicable land use plans, policies, or regulations.

c)	Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. The proposed ILA site is an existing developed site. The proposed project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

X. MINERAL RESOURCES

Setting

The project site is not located within an area designated by the state or Santa Barbara County for mineral resources (PEA, 2000, p. 14-8).

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. There are no known mineral resources within the project area.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. There are no known mineral resources within the project area.

XI. NOISE

Setting

A number of industrial establishments are located adjacent to the site. The site is designated as "Hotel and Related Commerce" 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 (see Figure 14-2).

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 exceed 60 dBA CNEL.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

a) Less Than Significant Impact. The project would not generate noise levels in excess of local standards at the closest receptor during construction because specially-muffled construction equipment

and a portable sound wall would be used as necessary for compliance with the City of Santa Barbara Municipal Code. In addition, Level 3 would comply with local construction-related noise ordinances by restricting construction activities to the period of 7 AM to 8 PM. Because, the construction period would be brief, approximately two months, and noise thresholds will not be exceeded, potential impacts associated with project construction are less than significant.

To reduce operations noise to less than 60 dBA CNEL, the generator location would be located at least 60 feet from the nearest receptor (see Figure 14-2), and the generator would be housed in a specially designed enclosure that reduces noise levels to 75 dBA at 5 feet. These measures would result in an operational noise level of 55 dBA CNEL and will comply with the City of Santa Barbara threshold limit.

Level 3 would 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.

Per SBCAPD Rule 201, the standby generator engine is exempt from permitting requirements because it would be used solely as a source of standby power and would be operated less than 100 hours per year.

The SLOAPACD Rule 601 requires that the generator satisfy Best Available Control Technology (BACT) because its daily emissions would exceed 25 lb/day. BACT would be satisfied because the engine is the latest available technology for a 1,750 kW generator and it would be used only 30 hours per year.

Level 3 would 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

b) Less Than Significant Impact. Neither project construction or project operations would generate excessive groundborne noise or vibration. The low level of groundborne vibration and noise generated during construction would be short term in nature, and would generally not extend more than a few feet from the active construction area. The construction area would be set back 60 feet from the nearest receptor (to the southeast). Because of the setback and the limited scope of construction activities, potential impacts associated with groundborne vibrations during construction are less than significant.

With regard to operations, the emergency generator would be the only potential source of groundborne vibration. However, the generator would be mounted on a concrete pad and would have a minimum of 4 vibration isolators that reduce groundborne vibration by more than 95 percent. The 60-foot setback from the nearest receptor provides additional assurance that excessive groundborne noise or vibration would not be perceived by off site receptors. The buried fiber optic cable would not generate any perceptible vibrations or noise. Consequently, potential impacts associated with groundborne vibration or noise during operation of the project is less than significant.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. There would be no permanent noise sources at the facility. Therefore, there would be no impacts.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

d) Less Than Significant Impact. Temporary increases in ambient noise levels would occur during the approximate two months of construction, but these levels would not be significant and would comply with the local construction noise ordinance.

With regard to project operations, the emergency generator would operate during weekly test for periods of approximately 30 minutes and during power outages, and some minor maintenance activities would generate periodic noise. This periodic noise would not be a substantial increase in ambient noise levels because the distance from the site boundary to the nearest public receptor would create a buffer area around the generator and the generator would be enclosed in a special noise-insulating enclosure.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

e) No Impact. 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

f) No Impact. 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 (PEA, 2000, p. 14-32). 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No impact**.** 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No impact**.** 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. Replacement housing would not be necessary.

c)	Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No impact**.** The project would consist of the reuse of an existing warehouse building and would not displace any people or structures. No replacement housing would be necessary.

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 mile from the project site. The police department is located at 215 E. Figueroa Street, approximately 0.9 mile 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).

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. Construction and operation of the unmanned ILA facility would have no impact on the local school, parks or other public facilities. The site would not have a significant impact on police services. A 1,000-gallon, double-walled, aboveground diesel fuel storage tank would be located on the facility grounds. Tank system design incorporates a high fuel alarm (local) and a tank rupture alarm (remote). Fire protection equipment would be installed per local codes. Although public facilities are in the general vicinity, the Santa Barbara ILA would not have a physical effect on the public facilities or increase the need for additional public facilities.

XIV. RECREATION

Setting

There are several parks located in the vicinity of the proposed project site including: Pershing and Plaza Del Mar Parks (within 0.5 miles south of the site), and Ambassador Park and Chase Palm Park (approximately 0.3 and 0.25 miles, respectively, south of the site). There are also a number of visitor-serving uses including hotels and restaurants throughout the project area (PEA, 2000, p. 14-33). However, due to the un-staffed nature of the ILA facility, the proposed project will not result in additional use of existing recreation facilities or require construction of additional recreational facilities. Based on a field study of the site and vicinity, analysis of PEA data and conclusions, a review of applicable local planning policy and guidance, and/or planning agency confirmation of PEA accuracy, no significant recreation impacts are anticipated with project implementation.

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 ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

a) No Impact. The proposed project will not be permanently staffed. Therefore, the proposed project will not contribute additional use of any recreation facilities.

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 ☐	Less than Significant With Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The project would not include recreation facilities nor require the construction of new recreation facilities that might have an adverse effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Setting

The proposed site would be 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 would be 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.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

a) Less Than Significant Impact. During construction of the proposed project, approximately 7 workers would be commuting to the site for approximately three months. Occasionally, trucks would deliver equipment and materials to the site as well as haul construction debris from the site to recycling centers or landfills. During the operational phase of the project, one or two service persons would visit the site approximately once a week. The project would cause a negligible increase in traffic. Therefore, potential impacts are less than significant.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The limited project traffic would not result in a measurable increase in traffic congestion.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. The project would not affect air traffic patterns.

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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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

d) No Impact. Access to the proposed site would be via existing driveways. No changes to the site design are proposed.

e)	Would the project result in inadequate emergency access?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

e) No Impact. The project would not affect emergency access routes during construction or operation.

f)	Would the project result in inadequate parking capacity?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

f) No Impact. Parking spaces would be provided on site to accommodate vehicles used in periodic maintenance visits.

g)	Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

g) No Impact. The City of Santa Barbara Circulation Element contains policies supporting pedestrian and bicycle transportation. These policies do not apply to the proposed project (PEA, 2000, p. 14-36).

XVI. UTILITIES AND SERVICE SYSTEMS

Setting

The project site would be developed with an industrial building and would be 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.

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. El Estero Wastewater Treatment Plant (EEWTP) provides wastewater treatment services to the City of Santa Barbara.

Evaluation

a)	Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

a) Less Than Significant Impact. The proposed site has existing restroom facilities; however, wastewater generation would be less than significant since the facility would be unmanned. The proposed site would not exceed the wastewater requirements of the applicable Regional Water Quality Control Board.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

b) No Impact. The proposed facility would use an existing building with all utilities and service systems available on site. There would be a minimal amount of wastewater produced. The site would not require the construction or expansion of water or wastewater treatment 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

c) No Impact. The proposed site would reuse an existing facility resulting in minimal construction and water use. The facility would not require construction or expansion of storm water drainage 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

d) Less Than Significant Impact. The proposed site would reuse an existing facility with all utilities and service systems on site. There would be sufficient water supplies for the minimal water use occurring on site.

e)	Would the project result in a determination by the wastewater treatment provider that 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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

e) Less Than Significant Impact. The proposed site would use an existing building with all utilities and service systems available on site. The local wastewater treatment provider could adequately serve the minimal amount of wastewater that would be generated on site.

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 ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☒	No Impact ☐

f) Less Than Significant Impact. The proposed facility would involve the reuse of an existing building. Minimal solid waste generation would occur during facility operation since it would be an unmanned facility. The site's solid waste disposal needs could be served by the Tajiguas Sanitary Landfill, which is permitted by the State of California.

g)	Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact ☐	Less than Significant with Mitigation Incorporation ☐	Less than Significant Impact ☐	No Impact ☒

g) No Impact. The project would not generate a significant amount of solid waste. Landfills where waste would be deposited would be in compliance with applicable solid waste laws. The project would comply with applicable solid waste laws.

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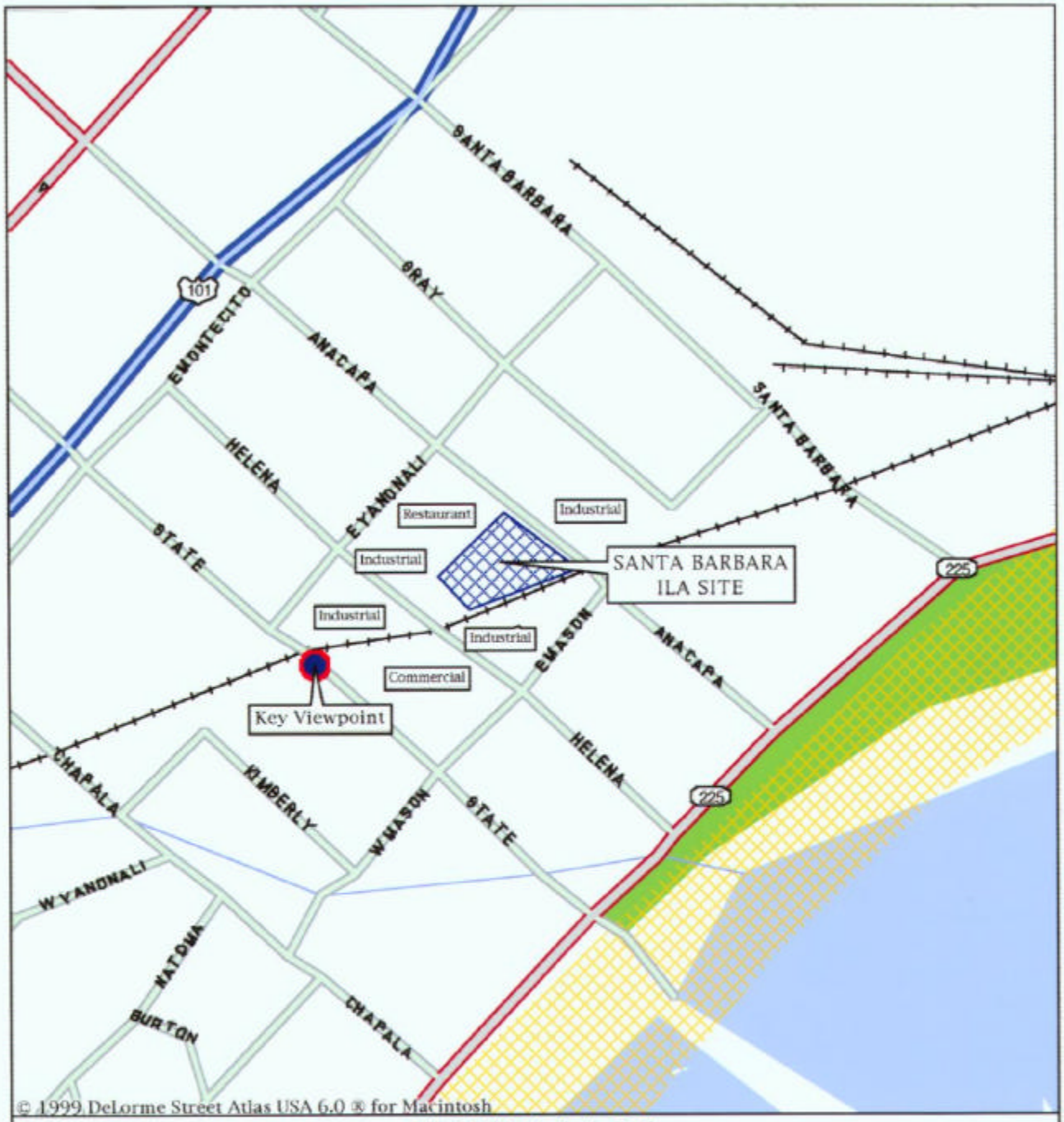

FIGURE 14-I-1

Mag 17.00
Fri Feb 25 18:03 2000
Scale 1:3,906 (at center)
200 Feet
100 Meters

Local Road
Major Connector
State Route
Interstate/Limited Access
Railroad
Water
Sand/Rock
River/Canal
City Park

Level 3 Communications Infrastructure Project	**Figure 14-I-2** **Santa Barbara ILA**	View to the northeast from the south side of State Street in the City of Santa Barbara. The proposed ILA facility would be located in the existing building (at 122 Helena Avenue) shown in the center of the photograph.

VISUAL ANALYSIS DATA SHEET

KEY VIEWPOINT DESCRIPTION

LEVEL 3 SITE NO.
14
PROJECT COMPONENT
Santa Barbara ILA
VIEWPOINT LOCATION
Southside of State Street, viewing to the northeast along the Union Pacific Railroad right of way, toward the existing building proposed to accommodate the ILA.
ANALYST
Michael Clayton
DATE
2/6/00

VISUAL QUALITY

[X] **Low** [ ] **Moderate** [ ] **High**	Views of the site encompass a foreground urban setting of commercial, office, and industrial development, paved surfaces, and infrastructure. Overall visual quality of this complex landscape is considered **low to moderate.**

VISUAL ABSORPTION CAPABILITY

The site is already developed with a structure within which the proposed ILA is proposed to be located. Therefore, visual absorption capability is considered **high**.

VIEWER SENSITIVITY

Viewer expectations for the immediate project vicinity are for an urban environment with commercial/industrial character. The proposed project will not change the existing foreground visual character of the project site or viewer expectations. Overall viewer sensitivity is rated **moderate** given the sites close proximity to the downtown core.

VIEWER EXPOSURE

Visibility: High	**Duration of View:** Brief to Moderate
Distance Zones: [FG: 0-0.5mi.; MG: 0.5-4mi.; BG: 4mi.-horizon] Foreground	**Overall Viewer Exposure:** **Moderate** - resulting from high visibility, low (Anacapa and Helena) to high (State Street) traffic volumes, and brief duration of views.
Numbers of Viewers: Moderate	

VISUAL IMPACT SUSCEPTIBILITY

[X] **Low** [ ] **Moderate** [ ] **High**	Although visual quality, viewer sensitivity, and viewer exposure are rated moderate, visual absorption capability is high. Minimal changes to the existing building exterior will not result in an increase in visual contrast and the changes will not be particularly noticeable to passing motorists on Helena, Anacapa, or State Street. Therefore, visual impact susceptibility is rated **low**.

(over)

Level 3 Site No. 14 Viewpoint
(continued)

VISUAL CONTRAST RATING

CHARACTERISTIC LANDSCAPE DESCRIPTION			
	LAND/WATER BODY	VEGETATION	STRUCTURES
FORM	Level	Indistinct (developed site with minimal landscaping)	Prominent, geometric
LINE	Horizontal	Indistinct (developed site)	Vertical, horizontal to diagonal
COLOR	Indistinct (developed site)	Indistinct (developed site)	White, red, dark green, grey
TEXTURE	Indistinct (developed site)	Indistinct (developed site)	Smooth to coarse

PROPOSED ACTIVITY DESCRIPTION			
	LAND/WATER BODY	VEGETATION	STRUCTURES
FORM	Same	Same	Same
LINE	Same	Same	Same
COLOR	Same	Same	Same
TEXTURE	Same	Same	Same

DEGREE OF CONTRAST												
	LAND/WATER BODY				VEGETATION				STRUCTURES			
	NONE	LOW	MODERATE	HIGH	NONE	LOW	MODERATE	HIGH	NONE	LOW	MODERATE	HIGH
FORM	√				√				√			
LINE	√				√				√			
COLOR	√				√				√			
TEXTURE	√				√				√			

TERM: ☑ Long ☐ Short

CONTRAST SUMMARY: ☑ None ☐ Low ☐ Moderate ☐ High

PROJECT DOMINANCE

Subordinate ☐ Co-Dominant ☑ Dominant ☐

VIEW IMPAIRMENT

None ☑ Low ☐ Moderate ☐ High ☐

VISUAL IMPACT SIGNIFICANCE

Potentially Significant Impact	Less than Significant With Mitigation	Less than Significant Impact	No Impact
☐	☐	☐	☑