

# State Clearinghouse No. 2020040309 ADDENDUM TO MITIGATED NEGATIVE DECLARATION

# RTI INFRASTRUCTURE, INC. GROVER BEACH SUBSEA FIBER OPTIC CABLES PROJECT

March 2022



**CEQA Lead Agency:** California State Lands Commission 100 Howe Avenue, Suite 100 South Sacramento, CA 95825

> **Applicant:** RTI Infrastructure, Inc. 7 Turtleback Lane Westport, CT 06880



### **MISSION STATEMENT**

The California State Lands Commission provides the people of California with effective stewardship of the lands, waterways, and resources entrusted to its care through preservation, restoration, enhancement, responsible economic development, and the promotion of public access.

### **CEQA DOCUMENT WEBSITE**

www.slc.ca.gov/Info/CEQA.html

### Project Geographic Location (Point at Mean High-Water Line)

Latitude: 35° 07.21' N Longitude: 120° 38.09' W (Datum NAD83)

Document prepared in coordination with:



Cover Photo: Looking at the cable landing site and staging area from Le Sage Drive (Photo courtesy of Devin Jokerst, ICF)

# TABLE OF CONTENTS

LIS	t of t	ABLES	ii
LIS	t of f	GURES	ii
LIS	t of A	ABBREVIATIONS AND ACRONYMS	iii
1.0		INTRODUCTION	1-1
	1.1	PROJECT LOCATION AND BACKGROUND	1-1
	1.2	ADDENDUM, LEASE 9632 MODIFICATION, AND PROJECT	
		OBJECTIVES	1-2
		1.2.1 Staging Area	1-5
2.0		CEQA ADDENDUM	2-1
	2.1	ADDENDUM PURPOSE AND NEED	2-1
3.0		ENVIRONMENTAL ASSESSMENT	3-1
	3.1	AESTHETICS	3-1
	3.2	AIR QUALITY	3-1
	3.3	BIOLOGICAL RESOURCES	3-6
	3.4	CULTURAL RESOURCES	3-7
		3.4.1 Terrestrial Cultural Resources	3-7
	o =	3.4.2 Marine Cultural Resources	3-7
	3.5		3-8
	3.0 2.7	GEOLOGY, SOILS, AND PALEON TOLOGICAL RESOURCES	3-11
	3.1 3.2		3-11
	3.0 3.0		3-15
	3 10	LAND USE AND PLANNING	
	3.11	NOISE	
		3.11.1 Construction Noise	3-16
		3.11.1.1 Cable Landing Site	3-16
		3.11.1.2 Underground Conduit System	3-16
		3.11.2 Operational Noise	3-17
		3.11.3 Vibration	3-18
		3.11.4 Airport Noise	3-18
	3.12	RECREATION	3-19
	3.13	TRANSPORTATION/TRAFFIC	3-19
	3.14	UTILITIES AND SERVICE SYSTEMS	3-20
4.0		DETERMINATION/ADDENDUM CONCLUSION	4-1
5.0		ADDENDUM PREPARATION SOURCES AND REFERENCES	5-1
- • •	5.1	ADDENDUM PREPARERS	5-1
	5.2	REFERENCES	5-2
		5.2.1 Personal Communication	5-2

# APPENDICES

- Appendix A. Equipment List and Air Emissions Calculations (November 2021)
- Appendix B. Biological Resources Information
- Appendix C. Cultural Resources Information

# TABLES

Table 1.1-1.	Comparison of Analyzed and Revised Project Components1-2
Table 3.2-1.	Estimated Maximum Daily and Quarterly Construction Criteria Pollutant Emissions for the Revised Project
Table 3.2-2.	Estimated Maximum Daily and Quarterly Terrestrial Construction Diesel Particulate Matter Emissions for the Revised Project
Table 3.6-1.	Estimated Construction Greenhouse Gas Emissions for the Revised Project (metric tons)

# FIGURES

Figure 1.2-1.	Project Location1-	-6
Figure 1.2-2.	Overview of Existing Facilities and Proposed Revisions1-	.7
Figure 1.2-3.	Offshore Hard Bottom Habitat Area and Existing Cable Crossings1-	-8
Figure 1.2-4.	Detailed View of Existing Facilities and Proposed Revisions at the Cable Landing Site1-	-9
Figure 3.2-1.	Sensitive Receptors	-4
Figure 3.4-1.	Marine Cultural Resources Study Area3-1	0

ii

### LIST OF ABBREVIATIONS AND ACRONYMS

- A Addendum Addendum to the Mitigated Negative Declaration
- **C** CARB California Air Resources Board
  - CEQA California Environmental Quality Act
  - CO carbon monoxide
  - CO<sub>2</sub> carbon dioxide
  - CO<sub>2</sub>e carbon dioxide equivalent
  - CSLC California State Lands Commission
- D District San Luis Obispo Air Pollution Control District
- DPM diesel particular matter
- **G** GHG greenhouse gas
- L LMH landing manhole LP landing pipe
- M MM mitigation measure
- MND Mitigated Negative Declaration
- **N** NAHC Native American Heritage Commission
- NOx nitrogen oxides
- P PM10 particulate matter with a diameter of 10 micrometers or less
- **R** ROG reactive organic gases
  - RTI RTI Infrastructure, Inc. (Applicant)
- S State Parks California Department of State Parks and Recreation

### 1 1.1 PROJECT LOCATION AND BACKGROUND

- 2 The RTI Infrastructure, Inc. (Applicant or RTI) Grover Beach Subsea Fiber Optic Cables
- 3 Project (Project) is located in the City of Grover Beach (City), San Luis Obispo County
- 4 (Figure 1.2-1). The Project involves onshore (land) in the City and areas in the Pacific
- 5 Ocean (ocean) offshore of the City.
- 6 On June 23, 2020, the California State Lands Commission (CSLC) adopted a Mitigated
- 7 Negative Declaration (MND) for the original Project (State Clearinghouse Number
- 8 2020040309) and authorized a General Lease Right-of-Way Use (Lease 9632) that
- 9 authorized the installation, use, and maintenance of one 2-inch-diameter subsea fiber
- 10 optic cable and four 6-inch-diameter steel conduits (also referred to as "landing pipes"
- 11 [LPs] in the MND) (<u>Item 50, June 23, 2020</u>). The MND analyzed the installation of four
- 12 LPs and four subsea fiber optic cables, although only one subsea fiber optic cable and
- 13 two LPs were approved by the Commission on June 23, 2020 (Figure 1.2-2).
- 14 Now, the Applicant proposes revisions to the original Project analyzed in the MND to
- 15 address new information regarding offshore hard bottom habitat and to respond to
- 16 anticipated future infrastructure needs. The Applicant states that LPs #3 and #4 need to
- be moved south of the already built LPs #1 and #2 to avoid multiple cable crossings at
- 18 the same location offshore<sup>1</sup> and sensitive hard bottom habitat<sup>2</sup> that recently was
- 19 identified during geophysical surveys conducted after the MND was adopted
- 20 (Figure 1.2-3).
- 21 The Applicant also is proposing to install two additional subsea fiber optic cables (not
- 22 analyzed in the MND) that would be pulled through LPs #5 and #6 (Figure 1.2-2) within
- 23 next 5 or so years, although a precise schedule is not yet known. The Applicant
- 24 determined the need for LPs #`5 and #6 after the MND was adopted and the Phase I
- 25 subsea fiber optic cable was installed. While it is not certain whether the subsea fiber

<sup>&</sup>lt;sup>1</sup> When possible, the submarine fiber optic cable engineers prefer not to cross existing infrastructure (e.g., cables, pipelines) for the following reasons: 1. Crossing other cables makes the cable burial process more difficult. 2. Rather than using the cable plow, the crossing must be accomplished with a remotely operated vehicle to avoid damaging the existing cable. 3. Potential future maintenance of either cable, the one being crossed or the one crossing, is more difficult. 4. It is more difficult to retrieve a cable to the surface for repair if another cable is laying across it.

<sup>&</sup>lt;sup>2</sup> Hard bottom habitat is considered a sensitive habitat due to its slow growth and susceptibility to being crushed or dislodged. The revised Project seeks to avoid this habitat as much as possible (**Mitigation Measure BIO-11**: Minimize Crossing of Hard Bottom Substrate).

- 1 optic cables would be installed through LPs #5 and #6 and their landing locations are
- 2 not finalized, there is a high probability that these additional subsea fiber optic cables
- 3 could land in the City in the next 5 or so years. Anticipating the need for this critical
- 4 infrastructure, the revised Project includes installing additional LPs to bring these
- 5 subsea fiber optic cables onshore in Grover Beach.

# 6 1.2 ADDENDUM, LEASE 9632 MODIFICATION, AND PROJECT OBJECTIVES

- 7 This Addendum to the MND (Addendum) analyzes the revised Project. The revised
- 8 Project includes installation of some previously analyzed facilities 450 feet southeast in
- 9 the same parking lot as the first two LPs and the addition of some new facilities, as
- 10 described in Table 1.1-1 and shown in Figures 1.2-2 and 1.2-4. The revised Project
- 11 construction activities are scheduled to begin in August 2022 and are expected to be
- 12 complete by the end of November 2022.
- Table 1.1-1 compares the Project components analyzed in the MND and the revised
- 14 Project components analyzed in this Addendum.

Project Component	Analyzed Project (MND)	Revised Project (Addendum)		
<b>Terrestrial Project Compo</b>	nents			
Cable Landing Site	Staging Area: Located in the Grover Beach parking lot. Landing Pipes: Up to four independent LPs were	Staging Area: Located in the Grover Beach parking lot, 450 feet southeast of where LPs #1 and #2 were installed.		
	analyzed. Two of the LPs (LPs #1 and #2 in Figure 1.2-2) were installed in 2020.	Landing Pipes: Move two of the previously analyzed LPs south (LPs #3 and #4 in Figure 1.2-2). Add two new LPs (LPs #5 and #6 in Figure 1.2-2).		
	landing manhole (LMH #1 in Figure 1.2-4) was installed in 2020 for LPs #1 and #2.	Landing Manhole: Two new landing manholes (LMH #2 for LPs #3 and #4 and LMH #3 for LPs #5		
	Ocean Ground Beds: Up to four ocean ground beds were analyzed. Only one ocean ground bed was installed onshore for the	and #6) would be added to the Project (Figure 1.2-4). <u>Ocean Ground Beds</u> : Two onshore or offshore ocean		

 Table 1.1-1. Comparison of Analyzed and Revised Project Components

Project Component	Analyzed Project	Revised Project	
	(MND)	(Addendum)	
	one subsea fiber optic cable that was installed in 2020.	ground beds would be installed for LPs #3 and #4 analyzed in the MND, but they would be moved 450 feet southeast (Figure 1.2-4). Possibly two new onshore or offshore ocean ground beds would be added to the revised Project for the two new cables to be installed through LPs #5 and #6 (Figure 1.2-4).	
Underground Conduit System	A 1.5-mile underground conduit system was analyzed and constructed in 2020 through City streets to the cable landing station (Figure 1.2-2). This conduit system goes under Meadow Creek.	Staging Area: A new underground conduit system approximately 0.11 mile (600 feet) long would be constructed to connect LMH #1 to LMHs #2 and #3 (Figure 1.2-2).	
		<u>City Streets</u> : An additional new underground conduit system, approximately 1 mile long, would be constructed from the proposed LMH #3 through City streets to end at the existing cable landing station (Figure 1.2-2). This conduit system also would go under Meadow Creek.	
Cable Landing Station	Equipment was added to an existing cable landing station during construction in 2020 (Figure 1.2-2).	Each additional cable would require new equipment to be added to the same cable landing station that was modified in 2020 (Figure 1.2-2).	
Additional Staging Area in the City (Grover Beach)	The staging area in the Grover Beach parking lot was used, along with a narrow strip of land located between the Union Pacific	Possibly, an additional staging area would be needed in the City. It is likely that the same staging area would be used.	

Project Component	Analyzed Project (MND)	Revised Project (Addendum)
Marina Project Componente	Railroad and Front Street at the intersection of Brighton Avenue.	
Londing Dipos	Lip to four L Pa word	Move two providualy
Landing ripes	analyzed in the MND even though only two were approved by CSLC and constructed in 2020.	analyzed LPs (LPs #3 and #4) 450 feet southeast and add two new LPs (LPs #5 and #6) (Figure 1.2-2).
Subsea Fiber Optic Cables	The MND analyzed installation of up to four subsea fiber optic cables as part of Phases 1 through 4. The CSLC approved installation of one subsea fiber optic cable that was installed in 2020 to connect to Singapore (Figure 1.2-2). A second LP is installed and will remain vacant awaiting a potential future cable.	Move two previously analyzed and yet to be installed subsea fiber optic cables 450 feet southeast in LPs #3 and #4 (Figure 1.2-2). Analyze two new subsea fiber optic cables to be installed in LPs #5 and #6 (Figure 1.2-2) as part of revised Project Phases 5 and 6.
Ocean Ground Beds	The MND analyzed four ocean ground beds to be installed onshore or offshore for each subsea fiber optic cable. In 2020, one ocean ground bed was installed onshore for the one cable that was installed.	Two previously analyzed ocean ground beds would be located about 450 feet southeast in the Grover Beach parking lot (Figure 1.2-2). Two new onshore or offshore ocean ground beds would be added to the Project for the two new subsea fiber optic cables to be installed in LPs #5 and #6 (Figure 1.2- 4).

- 1 The revised Project components listed above are analyzed in this Addendum.
- 2 Therefore, this Addendum would be relied on to modify Lease 9632 to allow the
- 3 Applicant to install the revised Project components and to build additional facilities that
- 4 were not previously analyzed in the MND.

- 1 The following are objectives for the revised Project:
- Provide infrastructure for anticipated future subsea fiber optic cables coming to
   Grover Beach
- Avoid crossing multiple existing subsea fiber optic cables where LPs #3 and #4
   previously were analyzed to be installed
- Avoid offshore hard bottom habitat where LPs #3 and #4 previously were
   analyzed to be installed

### 8 1.2.1 Staging Area

- 9 The revised Project would use the same staging area in the Grover Beach parking lot
- 10 and some of the overflow parking lot area under State Parks jurisdiction as was
- 11 analyzed in the MND (Figure 1.2-4). This parking lot would be the cable landing site
- 12 where equipment and materials would be staged in compliance with State Parks
- 13 requirements. No gravel is expected to be added to the staging area. The Project-
- 14 related work in 2020 used the narrow strip of land located between the Union Pacific
- 15 Railroad and Front Street at the intersection of Brighton Avenue for some staging
- 16 activities. It is likely that this same strip of land would be used for the revised Project. As
- 17 analyzed in the MND, it is also possible that a second staging area could be located in a
- 18 paved or developed site in the City (not yet identified because its location would depend
- 19 on the contractor).



Figure 1.2-1. Project Location



Figure 1.2-2. Overview of Existing Facilities and Proposed Revisions



Figure 1.2-3. Offshore Hard Bottom Habitat Area and Existing Cable Crossings



Figure 1.2-4. Detailed View of Existing Facilities and Proposed Revisions at the Cable Landing Site

### 1 2.1 ADDENDUM PURPOSE AND NEED

- 2 Per California Environmental Quality Act (CEQA) Guidelines, section 15164, once an
- 3 MND has been adopted for a Project, no subsequent negative declaration or
- 4 environmental impact report shall be prepared unless the lead agency determines that
- 5 certain circumstances are present. These circumstances occur when there is a new
- 6 significant impact, a substantial increase in a previously identified impact, or new
- 7 information concerning mitigation measures or alternatives that would substantially
- 8 reduce a significant impact (State CEQA Guidelines §15162). If the proposed changes
- 9 do not involve these specific circumstances, the lead agency may prepare an
- 10 addendum to the CEQA document—in this case, the MND for the Project.
- 11 The MND concluded that the Project, with mitigation, would have no significant effect on
- 12 the environment. The purpose of this Addendum is to analyze whether modifications to
- 13 the Project would cause significant impacts on the environment. As presented below,
- 14 none of the conditions described in State CEQA Guidelines §15162 calling for the
- 15 preparation of a subsequent environmental document have occurred. Consequently, an
- 16 Addendum is the appropriate CEQA document for analysis and consideration of the
- 17 revised Project.
- 18 Circulation of an Addendum for public review is not necessary (State CEQA Guidelines,
- 19 §15164, subd. [c]); however, the Addendum must be considered in conjunction with the
- 20 previous MND for the Project by the decision-making body (State CEQA Guidelines,
- 21 §15164, subd. [d]), which for this Project is the CSLC.

# 3.0 ENVIRONMENTAL ASSESSMENT

- 1 The comparative analysis in this Addendum is to analyze whether the revised
- 2 Project activities would result in any significant environmental impacts that were not
- addressed in the MND adopted by the CSLC in 2020 for the original Project. 3
- 4 Therefore, the analysis in this Addendum addresses the following:
- 5 Any impacts increased, decreased, or unchanged from the conclusions 6 discussed in the MND
- 7 Any changes required to mitigation measures
- 8 The analysis in the MND and this Addendum found that no impacts would occur 9 for the following environmental resource areas; therefore, these topics are not discussed further in this Addendum:
- 10
- 11 Agriculture and Forestry Resources
- 12 Energy
- 13 Mineral Resources
- 14 Public Services
- 15 Population and Housing
- 16 Wildfire •

#### 17 3.1 AESTHETICS

18 As described in the MND for the analyzed Project, visual impacts from the construction 19 activities would be short-term, temporary, and less than significant. Construction would 20 occur between August and November 2022. Most of the revised Project-related 21 activities would occur during daylight hours. The assembled LPs would be pulled 22 through the drilled holes during the nighttime and would take approximately 48 23 additional hours for the two new LPs #5 and #6 (Figure 1.2-2). No other nighttime 24 lighting is required from what was analyzed in the MND. The timeframe for construction 25 would be extended from what was previously analyzed and would be along a new 26 underground conduit system route close to the route analyzed in the MND and built in 27 2020. Aesthetic impacts related to new construction would not increase substantially 28 from those previously analyzed because the Project area is heavily disturbed, and 29 construction would take place be for a short time. No new aesthetic impacts have been 30 identified for the revised Project, and no mitigation is required.

#### 31 3.2 AIR QUALITY

32 Appendix A contains the emission analysis, equipment list, and schedule for the revised 33 Project. These revised Project components are defined in Table 1.1-1 in the Addendum.

- 1 Most of the revised Project components would be installed during the third quarter of
- 2 2022 using the same construction techniques as those analyzed in the MND. The two
- 3 new subsea fiber optic cables LPs #5 and #6 (Figures 1.2-2 and 1.2-4) likely would be
- 4 installed within the next 5 years. Because the precise construction timing for installation
- 5 of these new subsea fiber optic cables is not currently known, the analysis in the
- 6 Addendum conservatively assumes that all four subsea fiber optic cables (LPs #3, #4,
- 7 #5, and #6) would be installed concurrently during the third quarter of 2022 with all other
- 8 elements proposed under the revised Project (refer to Section 1.2).
- 9 It is possible that the emissions intensity of equipment and vehicle operation will be
- 10 lower in 5 years than under 2022 conditions because of technology improvements and
- 11 regulations to reduce combustion emissions. Accordingly, assuming that the additional
- 12 components proposed under the revised Project would be fully constructed during the
- 13 third quarter of 2022 is a conservative representation of potential air quality impacts.
- 14 The San Luis Obispo County Air Pollution Control District (District) has maximum daily
- 15 and quarterly thresholds for reactive organic gases (ROG) and nitrogen oxides (NOx).
- 16 Maximum daily and quarterly emissions estimated for the revised Project during the
- 17 third quarter of 2022 are compared to the District recommended emission thresholds in
- 18 Table 3.2-1. The District uses a tiered threshold approach to determine the need for
- 19 mitigation. If Tier 1 thresholds are not exceeded, then the impact is less than significant
- 20 without the need for mitigation. If the Tier 1 thresholds are exceeded (as is expected for
- 21 the revised Project), but emissions remain below Tier 2, then impacts are less than
- significant so long as the Project implements the District's required mitigation. If Tier 2
- thresholds are exceeded, then impacts are less than significant so long as the Project
- 24 purchases offsets.
- 25 Table 3.2-1 below summarizes these emissions and thresholds assuming that all
- 26 components would be constructed during the third quarter of 2022. The revised Project
- 27 is expected to exceed the daily and quarterly ozone precursor (ROG and NOx)
- 28 emissions thresholds. The quarterly precursor threshold emissions would exceed Tier 1
- 29 but not Tier 2. Therefore, the impact would be less than significant with implementation
- 30 of the District required mitigation. The particulate matter with a diameter of 10
- 31 micrometers or less (PM10) for quarterly emissions would not exceed the thresholds.

Pollutant Emissions for the Revised Project		
	Daily (pounds per day)	Quarterly (tons per quarter)

Table 3.2-1 Estimated Maximum Daily and Quarterly Construction Criteria

Construction Deviad a	Daily (pounds per day)	y) Quarterly (tons per quarter)	
Construction Period *	ROG + NOx	ROG + NOx	Fugitive PM10
Revised Project (2022)	1,210	6.2	0.1
Threshold	137	2.5 (Tier 1)	2.5
		6.3 (Tier 2)	

-

\_\_\_\_

Construction Deried a	Daily (pounds per day)	Quarterly (tons per quarter)	
Construction Period "	ROG + NOx	ROG + NOx Fugitive PI	
Exceed threshold?	Yes	Yes (Tier 1) No (Tier 2)	No

Terms:

ROG = reactive organic gases

NOX = nitrogen oxides

PM10 = particulate matter with a diameter of 10 micrometers or less

Notes:

<sup>a</sup> The revised Project would not change any of the Project components or analysis conducted for the Project phases that have not been constructed yet. Refer to Table 3.3-3 in the MND. The emissions presented above conservatively assume that concurrent construction of all revised Project components, including installation of two additional subsea fiber optic cables (LPs #5 and #6), would occur during the third quarter of 2022.

See Appendix A for emission analysis, equipment list, and schedule.

- 1 The revised Project would not change any of the air quality analysis for pulling the Asia
- 2 or Australia subsea fiber optic cables to California and installation of their associated
- 3 infrastructure. Accordingly, emissions associated with these components are not
- 4 presented in Table 3.2-1 because they already have been analyzed in the MND
- 5 (Reported as Phases 3 and  $4^3$  in MND Table 3.3-3). Moving the previously analyzed
- 6 LPs #3 and #4 450 feet southeast in the same Grover Beach parking lot as LPs #1 and
- 7 #2 were installed for the analyzed Project would not change the air quality emissions
- 8 analyzed in the MND because the types of construction activities would be the same in
- 9 both locations.
- 10 As with the analyzed Project in the MND, residential and non-residential receptors are
- 11 located within 1,000 feet of the revised Project footprint. Based on the Project footprint
- 12 and National Agriculture Imagery Program imagery from the U.S. Department of
- 13 Agriculture (2020), approximately 751 residential properties are within a 1,000-foot
- 14 buffer of the revised Project footprint (Figure 3.2-1 below). Single-family homes and Le
- 15 Sage Riviera RV Park are adjacent to the new underground conduit system alignment.
- 16 As described in the MND, **MM AQ-1** (Standard Control Measures for Construction
- 17 Equipment), MM AQ-2 (Conduct Biological Surveying and Monitoring), and MM AQ-3
- 18 (Delineate Work Limits to Protect Sensitive Biological Resources) also would be
- 19 implemented for the revised Project to reduce potentially significant impacts to a less

<sup>&</sup>lt;sup>3</sup> The MND analyzed the original Project in phases. The phase approach does not work for the revised Project because some of the remaining Project components are not yet determined. Therefore, the Addendum and Appendix A analyze all remaining Project activities at the same time and not as part of any specific phases.

- 1 than significant level. Pursuant to District guidance, projects that incorporate these
- 2 measures and do not exceed their Tier 2 ROG and NOx thresholds (as shown in
- 3 Table 3.2-1 for the revised Project) would have less than significant short-term
- 4 construction impacts on air quality (District 2017; Kirkhuff pers. comm.).
- 5 The District has established thresholds to assist lead agencies in evaluating the
- 6 significance of diesel particular matter (DPM) emissions and associated health effects.
- 7 Table 3.2-2 below summarizes DPM generated by terrestrial construction sources
- 8 associated with the revised Project, assuming that all components would be constructed
- 9 concurrently during the third quarter of 2022. As noted above, the revised Project would
- 10 not change any of the Project components or analyses conducted for the remaining
- 11 activities of the previously analyzed Project in the MND. Accordingly, these activities
- 12 and their associated DPM emissions are not presented in the table because they were
- 13 previously analyzed in the MND (reported as "Phases 3 and 4" in Table 3.3-5 of the
- 14 MND). The District has a maximum daily DPM threshold and two quarterly thresholds. If
- 15 quarterly DPM emissions exceed the Tier 1 threshold, they should then be compared to
- 16 the Tier 2 threshold. As shown in Table 3.2-2, the revised Project would not generate
- 17 DPM emissions above District thresholds.

# Table 3.2-2. Estimated Maximum Daily and Quarterly Terrestrial Construction Diesel Particulate Matter Emissions for the Revised Project

Construction Period <sup>a</sup>	Daily (pounds per day) <sup>b</sup>	Quarterly (tons per quarter) <sup>b</sup>
Revised Project (2022)	1	0.02
Threshold	7	0.13 (Tier 1)
	/	0.32 (Tier 2)
Exceed threshold?	No	No

Notes:

<sup>a</sup> The revised Project would not change any of the Project components or analyses conducted for Project phases that have not been constructed yet. Refer to Table 3.3-5 in the MND. The emissions presented above conservatively assume that concurrent construction of all revised Project components, including installation of the two additional subsea fiber optic cables, would occur during the third quarter of 2022.

<sup>b</sup> The DPM estimates were derived from the PM10 exhaust calculations. This approach represents a worst-case scenario because it includes gasoline PM10 exhaust from employee vehicles.

See Appendix A for emission analysis, equipment list, and schedule.

- 18 Additional use of marine vessels for additional subsea fiber optic cables would generate
- 19 DPM, although these emissions would occur exclusively offshore and more than 3,600
- 20 feet from the closest receptor (Figure 3.2-1 below). Like the analyzed Project, DPM
- 21 emissions generated by the revised Project would have a limited potential to affect
- 22 sensitive receptors. There would be no new significant air quality impact, and no new
- 23 mitigation is required.



### Figure 3.2-1. Sensitive Receptors



March 2022

3-5

### 1 3.3 BIOLOGICAL RESOURCES

- 2 The terrestrial and marine biological resources associated with the revised Project are
- 3 similar to those described in the MND. There are no hard bottom substrates offshore
- 4 along the new LPs pathways. Appendix B contains a Terrestrial Biological Resources
- 5 Technical Memorandum and Marine Biological Resources letter that documents the
- 6 existing terrestrial and marine biological baseline conditions, potential impacts, and
- 7 previously adopted mitigation measures that would still be applicable to the revised
- 8 Project. It also documents terrestrial surveys that were conducted in the revised Project
- 9 area in 2021 and some photos of the revised terrestrial Project area.
- 10 Two new special-status plant species that were located adjacent to the biological study
- 11 area for the revised Project were identified during the 2021 botanical surveys:
- 12 Blochman's leafy daisy (Erigeron blochmaniae) and Blochman's ragwort (Senecio
- 13 *blochmaniae*). These species were documented within the disturbed coastal dune
- 14 habitat southwest of the cable landing site but were outside the designated 200-foot
- 15 buffer biological study area and would not be disturbed by revised Project activities
- 16 (Appendix B). As described in Appendix B, delineating work limits (**MM BIO-3**) to protect

17 Blochman's leafy daisy and Blochman's ragwort would ensure that both species are

- 18 protected and would avoid impacts on both species.
- 19 The MMs listed below and described in the MND also would be implemented to reduce
- 20 potentially significant impacts from the revised Project on terrestrial and marine
- 21 biological resources to a less than significant level. No new mitigation is required.
- **MM BIO-1:** Provide Environmental Awareness Training
- **MM BIO-2:** Conduct Biological Surveying and Monitoring
- **MM BIO-3**: Delineate Work Limits to Protect Sensitive Biological Resources
- MM BIO-4: Install Metal Covers or Some Kind of Escape Ramps in Open
   Trenches
- MM BIO-5: Implement Best Management Practices for Horizontal Directional
   Drilling Activities
- **MM BIO-6:** Prepare and Implement an Inadvertent Return Contingency Plan
- MM BIO-7: Conduct Pre-Construction Nesting Bird Surveys and Implement
   Avoidance Measures
- 32 **MM BIO-8:** Inspection and Burial of Cable
- **MM BIO-9**: Cable Entanglements and Gear Retrieval

- 1 **MM BIO-9:** Cable Entanglements and Gear Retrieval
- MM BIO-10: Prepare and Implement a Marine Wildlife Monitoring and
   Contingency Plan
- **MM BIO-11:** Minimize Crossing of Hard Bottom Substrate
- **MM BIO-12:** Contribute Compensation to Hard Substrate Mitigation Fund
- **MM BIO-13:** Control of Marine Invasive Species
- 7 **MM APM-1:** Fishing Agreement

# 8 3.4 CULTURAL RESOURCES

9 Appendix C contains additional documentation to support analysis of potential impacts
 10 on terrestrial cultural and marine cultural resources associated with the revised Project.

### 11 **3.4.1 Terrestrial Cultural Resources**

A records search for the Project area was conducted on May 28, 2019, at the California Historical Resources Information System Central Coast Information Center in Santa Barbara. The original study area for the terrestrial records search included the footprint for the analyzed Project and an additional 0.25-mile radius. The revised Project footprint is within this additional 0.25-mile radius area. Therefore, no additional area needs to be analyzed for the revised Project.

- 18 As explained in the MND, the terrestrial records search found that 13 cultural resources
- 19 studies had been conducted in the study area. Two historic-era built-environment
- resources were identified in records search results and pedestrian surveys: a segment
   of Highway 1 and a segment of the Union Pacific Railroad. Both resources have been
- of Highway 1 and a segment of the Union Pacific Railroad. Both resources have been recommended as ineligible for listing in the National Register of Historic Places and the
- 22 California Register of Historical Resources, and they are not considered historical
- resources for the purposes of CEQA. Furthermore, neither of these built-environment
- 25 resources would be affected by the revised Project.
- 26 As described in Appendix C, pedestrian surveys of the revised Project area were
- 27 conducted by an archaeologist and architectural historian. No archaeological or historic
- 28 built-environment resources were identified during the survey. Based on current and
- 29 previous studies, the possibility of uncovering unidentified or buried archaeological sites
- 30 during construction is considered low along the new underground conduit system route
- 31 and in the Grover Beach parking lot.

# 1 3.4.2 Marine Cultural Resources

- 2 The study area for the marine cultural resources records search included the subsea
- 3 fiber optic cable corridors for the analyzed Project in the MND and an additional radius
- 4 of 10 nautical miles that includes the subsea fiber optic cable corridors of the revised
- 5 Project (Figure 3.4-1). The records search (Appendix C), including the shipwrecks
- 6 database search, revealed no submerged offshore precontact Native American
- 7 resources in the study area.
- 8 The MMs listed below and described in the MND also would be implemented to reduce
- 9 potentially significant impacts from the revised Project on previously unknown
- 10 archaeological resources to less than significant. No new mitigation is required.
- MM CUL-1/TCR-1: Discovery of Previously Unknown Cultural or Tribal Cultural
   Resources
- 13 MM CUL-2/TCR-2: Cultural Resources Monitoring
- MM CUL-3: Conduct a Pre-Construction Offshore Archaeological Resources
   Survey
- **MM CUL-4:** Conduct a Pre-Construction Offshore Historic Shipwreck Survey
- MM CUL-5: Prepare and Implement an Avoidance Plan for Marine
   Archaeological Resources
- 19 **MM CUL-6/TCR-3:** Unanticipated Discovery of Human Remains

# 20 3.5 CULTURAL RESOURCES - TRIBAL

- 21 Staff received a response from the Native American Heritage Commission (NAHC)
- 22 dated February 8, 2022, for an updated list of tribes to contact for the revised Project.
- 23 Outreach letters explaining the project changes and need for an Addendum were sent
- to the tribes on March 11, 2022.
- Staff previously reached out to the nine tribes identified by the NAHC's response letter
  dated October 15, 2019, for the original Project to seek further information about known
- tribal cultural resource sites or any other tribal cultural resources in or near the Project
- area as described in the MND Section 3.6, *Cultural Resources -Tribal*. Staff received
- 29 responses from the following three tribal representatives identified in the NAHC letter
- 30 (dated October 15, 2019).
- Fred Collins, Chair Northern Chumash Tribal Council
  - Requested and was mailed a copy of the cultural resource survey report.

32

- 1 Freddie Romero, Cultural Resources Manager - Santa Ynez Band of Chumash 2 Indians Elders Council 3 Noted that the Project likely would involve impacts on sensitive areas but 4 deferred to the Yak tityu tityu yak tilhini as the primary culturally affiliated 5 tribe. 6 Mona Tucker, Chairwoman - Yak tityu tityu yak tilhini Northern Chumash Tribe -7 San Luis Obispo County and Region 8 • Requested government-to-government consultation pursuant to the CSLC's Tribal Consultation Policy (CSLC 2016), regarding potential 9 10 impacts on tribal cultural resources and sensitive cultural areas. 11 As a result of consultation, the MND incorporated MM CUL-2/TCR-2 (Cultural 12 Resources Monitoring) that required the Applicant to prepare and implement a Cultural 13 Resource Monitoring Plan to ensure that unanticipated discoveries of tribal cultural 14 resources are identified and protected in place, where possible, and would be treated 15 with respect and care where avoidance is infeasible. For installing the LPs #1 and #2 in 16 2020, the tribal monitors were present during environmental training (MM BIO-1) and 17 ground disturbances to ensure that any unearthed tribal cultural resources would be 18 documented appropriately. The tribal monitors also would be invited to monitor during 19 the revised Project work. 20 The MMs listed below and described in the MND also would be implemented to reduce 21 potentially significant impacts from the revised Project on tribal cultural resources or 22 mitigate them to a less than significant level. No new mitigation is required. 23 **MM CUL-1/TCR-1:** Discovery of Previously Unknown Cultural or Tribal Cultural • 24 Resources 25 MM CUL-2/TCR-2: Cultural Resources Monitoring
- **MM CUL-6/TCR-3:** Unanticipated Discovery of Human Remains



Figure 3.4-1. Marine Cultural Resources Study Area

# 1 3.6 GEOLOGY, SOILS, AND PALEONTOLOGICAL RESOURCES

Geology and soils in the revised Project area, including the revised underground conduit
system, are the same as those described in the MND for the analyzed Project. The
Applicant requests the following revisions to the underground conduit system (see
Figure 1.2-2):

- A new underground conduit system approximately 600 feet long would be constructed to connect LMH #1 to proposed LMH #2 and LMH #3.
- A new underground conduit system, approximately 1 mile long, would extend
   from the proposed LMH #3 through City streets to the existing cable landing
   station.

11 Modifications to the underground conduit system would involve the same construction

12 processes and equipment as described in the MND. No additional actions would be

13 required to prepare the site for construction activities beyond those already considered

- 14 in the MND for the analyzed Project.
- 15 As described in the MND, no paleontological resources were identified within the Project
- 16 area or its immediate surroundings, including the area of the revised underground
- 17 conduit system. Given that the geological deposits found in the Project area are
- 18 considered too young (i.e., less than 10,000 years old) to contain paleontological
- 19 resources, it is unlikely that the revised Project would affect paleontological deposits.
- 20 Therefore, the revised Project would not result in any new significant impacts on
- 21 geology, soils, or paleontological resources, and no new mitigation is required.

# 22 **3.7 GREENHOUSE GAS (GHG) EMISSIONS**

- 23 As discussed in Section 3.2, Air Quality, the revised Project includes installation of 24 additional infrastructure. Based on the revised schedule, except for the two new subsea 25 fiber optic cables (installed through LPs #5 and #6 as seen in Figure 1.2-4), construction 26 of the revised Project components would occur during the third quarter of 2022. The two 27 new subsea fiber optic cables likely would be installed within the next 5 years. Because 28 the precise construction timing for installation of the new subsea fiber optic cables is not 29 currently known, this analysis conservatively assumes that they would be installed 30 concurrently with all other elements proposed for the revised Project during the third 31 quarter of 2022. In 5 years, it is possible that the carbon intensity of equipment and 32 vehicle operation will be lower than under 2022 conditions because of improvements in 33 technology and regulations to reduce combustion emissions. Accordingly, assuming 34 that the additional components proposed under the revised Project, including the 35 subsea fiber optic cables, would be fully constructed during the third quarter of 2022 is a
- 36 conservative representation of potential GHG impacts.

- 1 Emissions for the revised Project were estimated using the methods described in the
- 2 MND. Revisions to the equipment list and schedule are presented in Appendix A.
- 3 Table 3.6-1 below summarizes the analysis of GHG emissions for the revised Project
- 4 (see Appendix A for calculations). All emissions were conservatively assumed to be
- 5 generated in 2022. The revised Project would not change any of the Project
- 6 components or analysis conducted for construction occurring during later years or the
- 7 long-term operation of the analyzed Project. Accordingly, emissions generated by the
- 8 remaining construction phases and operations and maintenance are not presented in
- 9 this Addendum because they were analyzed previously in the MND.

# Table 3.6-1. Estimated Construction Greenhouse Gas Emissions for the Revised Project (metric tons)

Source <sup>a</sup>	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Off-road equipment	97	<1	<1	98
On-road vehicles	54	<1	<1	56
Marine vessels within 3 nautical miles	348	<1	<1	352
Marine vessels between 3 and 24 nautical miles	379	<1	<1	384
Total	877	<1	<1	891
Threshold	0	0	0	0

Terms:

 $CO_2$  = carbon dioxide

 $CH_4 = methane$ 

 $N_2O$  = nitrous oxide

CO<sub>2</sub>e = carbon dioxide equivalent

Notes:

- <sup>a</sup> The revised Project would not change any of the Project components or analysis conducted for the Project phases that have not been constructed yet. Refer to Table 3.9-3 in the MND. The emissions presented above conservatively assume that concurrent construction of all revised Project components, including installation of the two additional subsea fiber optic cables, would occur during the third quarter of 2022. See Appendix A for calculations.
- 10 Construction of the revised Project components would generate 891 metric tons of
- 11 carbon dioxide equivalent (CO<sub>2</sub>e), which exceeds the analysis threshold of no net
- 12 increase above zero. As described in the MND, the Project would implement
- 13 **MM GHG-1** (Purchase GHG Carbon Offsets for Construction Emissions) to completely
- 14 offset GHG emissions during construction to net zero. Since development of this
- 15 measure for the MND, Golden Door Properties, LLC v. County of San Diego 50 Cal.
- 16 App. 5th 467 (2020) added a level of increased rigor for the use of GHG credits as
- 17 CEQA mitigation. In its decision, the California Fourth District Court of Appeal held that
- 18 a supplemental environmental impact report prepared by San Diego County for their
- 19 Climate Action Plan violated CEQA because it relied on a mitigation measure that was

- 1 improperly deferred and lacked enforceable performance criteria. The court specifically
- 2 questioned the use of GHG credits not approved according to California Air Resources
- 3 Board (CARB) protocol within the California Cap-and-Trade Program and in particular,
- 4 credits that could originate outside of California. The court also criticized the measure's
- 5 sole reliance on San Diego County staff to assess future GHG credit feasibility and
- enforcement. While the court's decision does not prohibit the use of GHG credits as
   CEQA mitigation, it underscores the need for such mitigation to include enforceable
- CEQA mitigation, it underscores the need for such mitigation to include enforceable
   performance standards and objective criteria to ensure that the GHG reductions from
- 9 GHG credits are achieved.
- 10 Therefore, **MM GHG-1** is being modified in this Addendum consistent with recent court
- 11 guidance. The updated measure outlines specific and comprehensive criteria for
- 12 purchasing the GHG credits. Pursuant to **MM GHG-1** (as modified), the 891 metric tons
- 13 of CO<sub>2</sub>e estimated for the revised Project would be reduced to a less than significant
- 14 level and would not conflict with the State's adopted GHG reduction goal under Senate
- 15 Bill 32 (Pavley, Chapter 249, Statutes of 2016). The remaining 1,147 metric tons of
- 16 CO<sub>2</sub>e estimated in the MND for pulling the Asia or Australia submarine fiber optic cables
- 17 to California and installation of associated infrastructure (reported as Phases 3 and 4<sup>4</sup> in
- the MND) as well as an estimated 100 to 125 metric tons CO<sub>2</sub>e from those portions of
- 19 prior Phase 1 activities that have not yet been completed would also be subject to
- 20 Modified MM GHG-1, as modified in this Addendum.<sup>5</sup> There would be no new GHG
- 21 impact, and no additional mitigation is required.

### 22 Modified MM GHG-1: Purchase GHG Carbon Offsets for Construction Emissions.

- 23 The Applicant shall purchase and retire Greenhouse Gas (GHG) offsets equivalent to
- 24 the Project's remaining projected GHG emissions (2,150 metric tons CO<sub>2</sub>e) to achieve a
- 25 net zero increase in GHG emissions during the construction phase for emissions within
- 26 24 nm of the California coast. A GHG offset is a credit derived from the reduction of
- 27 GHG emissions through a separate emissions-reduction project, often in a location
- 28 different from the emission source.
- 29 All GHG offsets must be purchased from a California Air Resources Board (CARB)-
- 30 approved registry. These registries are currently the American Carbon Registry (ACR),

<sup>&</sup>lt;sup>4</sup> The MND analyzed the original Project in phases. The phase approach does not work for the revised Project because some of the remaining Project components are not yet determined. Therefore, the Addendum and Appendix A analyze all remaining Project activities at the same time and not as part of any specific phase.

<sup>&</sup>lt;sup>5</sup> The 1,147 value comes from adding Phases 3 and 4 values in Table 3.9-3 of the MND; Phase 3 is estimated to result in 574 metric tons  $CO_2e$ , and Phase 4 is estimated to result in 573 metric tons  $CO_2e$ .

- 1 Climate Action Reserve (CAR), and Verra, although additional registries may be
- 2 accredited by CARB in the future. These registries use robust accounting protocols for
- 3 all GHG offsets created for their exchange, including the six currently approved CARB
- 4 protocols. This mitigation measure specifically requires GHG offsets created for the
- 5 Project to originate from a CARB-approved protocol or a protocol that is equal to or
- 6 more rigorous than CARB protocol requirements under 17 CCR 95972. The protocol
- 7 must demonstrate that the reduction of GHG emissions is real, permanent, quantifiable,
- 8 verifiable, enforceable, and additional, as defined in 17 CCR 95802(a). Note that
- 9 enforceable, as defined in 17 CCR 95802(a), is specific to CARB's Cap-and-Trade
- 10 regulatory program, where CARB holds enforcement authority. This mitigation measure
- 11 employs GHG offsets from the voluntary market, where CARB has no enforcement
- 12 authority. Therefore, enforceable is modified to mean in this context that the GHG
- 13 reduction project generating the GHG offset must be owned by a single entity and must
- 14 be backed by a legal instrument or contract that defines exclusive ownership.
- 15 The Applicant shall purchase GHG offsets by geographic prioritization herein called
- 16 "Tiers." Each Tier identifies a geographic location or region in which emissions-
- 17 reduction projects may occur.
- Tier 1: Within San Luis Obispo County, the counties adjacent to San Luis Obispo
   County, or the California San Joaquin Valley.
- Tier 2: Within California
- Tier 3: Outside California
- The Applicant shall purchase GHG offsets at the lowest Tier (i.e., Tier 1, then Tier 2, etc.), subject to availability or cost prohibition as described:
- 24 1. Lack of sufficient available GHG offsets in a lower Tier; or
- 25
   2. GHG offsets at a lower Tier are priced at or above the settlement price of the
   26
   26 latest CARB Cap-and-Trade auction.
- 27 All GHG offsets shall be verified by an independent verifier accredited by the ANSI
- 28 National Accreditation Board (ANAB) or CARB, or an expert with equivalent
- 29 qualifications to the extent necessary to assist with the verification. Following the
- 30 standards and requirements established by the accreditation board (ANAB or CARB),
- 31 the verifier shall certify:
- The GHG offsets conform to a CARB-approved protocol or a protocol that is
   equal to or more rigorous than CARB requirements under 17 CCR 95972.
   Verification of the latter requires certification that the offsets meet or exceed the
   standards in 17 CCR 95972.

- The GHG offsets are real, permanent, quantifiable, verifiable, enforceable, and additional, as defined in this measure.
- The GHG offsets were purchased according to the geographic prioritization
   defined in this measure.
- 5 Verification of GHG offsets must occur as part of the certification process for
- 6 compliance with the accounting protocol. Once certified, the Applicant shall provide to
- 7 CSLC staff copies of the retirement verification for all GHG offsets purchased pursuant
- 8 to this measure at least 30 days in advance of commencement of Project activities.

### 9 3.8 HAZARDS AND HAZARDOUS MATERIALS

As discussed in the MND for the analyzed Project, the potential for the release of
hazards and hazardous materials would be limited to the use of gasoline, diesel,

- 12 lubricants, and solvents. The revised Project would not involve additional sources of
- 13 hazardous material; however, because of the new underground conduit system, the
- 14 revised Project would use additional fuels, solvents, and lubricants during construction.
- 15 As described in the MND, the risk associated with hazardous materials would be
- 16 mitigated through implementing existing regulations and construction industry
- 17 standards for the containment and recovery of spills (e.g., Spill Contingency and
- 18 Hazardous Materials Management Plans [**MM HAZ-1**]), providing environmental
- 19 awareness training (**MM BIO-1**), delineating work limits to protect environmentally
- 20 sensitive areas and resources (**MM BIO-3**), implementing best management practices
- 21 for horizontal directional drilling activities (**MM BIO-5**), and preparing and implementing
- 22 an inadvertent return contingency plan (**MM BIO-6**). Therefore, the revised Project
- 23 would not result in new hazards or impacts related to hazardous materials, and no new
- 24 mitigation is required.

# 25 3.9 HYDROLOGY AND WATER QUALITY

- 26 Impacts on water quality and hydrology related to the revised Project are the same as
- those described in the MND. Risks associated with impacts on hydrology and water
- 28 quality would be mitigated through implementing existing regulations and
- 29 construction industry standards for the containment and recovery of spills (e.g., Spill
- 30 Contingency and Hazardous Materials Management Plans [MM HAZ-1]), implementing
- 31 best management practices for horizontal directional drilling activities (MM BIO-5), and
- 32 preparing and implementing an inadvertent return contingency plan (MM BIO-6).
- 33 Therefore, the revised Project would not result in new impacts on hydrology or water
- 34 quality, and no new mitigation is required.

### 1 3.10 LAND USE AND PLANNING

- 2 The revised Project would not result in any changes to the proposed land uses
- 3 described in the MND. The cable landing site would be located on a private parcel
- 4 (Assessor's Parcel Number 060-381-010) occupied by Fin's Seafood Restaurant & Bar
- 5 and parking area and would not significantly affect parking (Figure 1.2-4). The proposed
- 6 underground conduit system would be located underground and mainly within public
- 7 road rights-of-way. None of the requested modifications, including the additional subsea
- 8 fiber optic cables, LPs, and LMHs—and their proposed locations, would change existing
- 9 land uses. Therefore, the revised Project would not result in new impacts related to land
- 10 use and planning, and no new mitigation is required.

# 11 3.11 NOISE

- 12 Construction and operation of the revised Project would generate noise and vibration
- 13 through installation of two additional subsea fiber optic cables, two additional LMHs, two
- 14 additional LPs (LPs #5 and #6), and a new underground conduit system. The noise- and
- 15 vibration-related impacts from the revised Project components are the same as those
- 16 presented in the MND for the analyzed Project.
- 17 The same types of noise-sensitive land use in the analyzed Project area are present in
- 18 most of the revised Project area (residential and commercial areas), except the
- 19 underground conduit system (Figure 1.2-2). The revised Project's underground conduit
- system would follow a new route and would affect additional receptors. The additional
- 21 receptors are located along West Grand Avenue, 5th Street, and Farroll Road
- 22 (Figure 3.2-1).

# 23 3.11.1 Construction Noise

- 24 3.11.1.1 Cable Landing Site
- 25 As noted above, the revised Project is expected to require similar construction
- 26 equipment to that analyzed in the MND. Noise from the revised Project at the cable
- 27 landing site could range from 82 to 83 dBA (A-weighted decibels) Leq (equivalent sound
- level) and 87 to 88 L<sub>max</sub> (maximum sound level) 50 feet away, as identified in the MND.
- 29 This level of noise would result in the same severity of impact as the analyzed Project,
- 30 which would be potentially significant since it would exceed the City municipal code
- 31 noise restriction of 85 dBA for commercial land uses (at the cable landing site).
- 32 3.11.1.2 Underground Conduit System
- 33 During construction of the new underground conduit system, the revised Project would
- 34 expose additional noise-sensitive land uses (i.e., residences) than described for the
- 35 analyzed Project in the MND and would operate construction equipment closer to

- 1 sensitive receptors (Figure 3.2-1). Based on the proposed route of the second
- 2 underground conduit system, the revised Project would generate noise along 5th Street
- 3 and Farroll Road, thus exposing noise-sensitive land uses not evaluated in the MND to
- 4 construction noise (Figure 1.2-2 and 3.2-1). Although affecting a greater number of
- 5 noise-sensitive land uses, the amount of noise generated by the equipment would be
- 6 the same as described in the MND for the analyzed Project. Other than entry and exit
- areas, much of the terrestrial conduit system would involve subterranean activity that
  would be attenuated by the ground surface and likely not detectable to receptors on the
- a surface
- 9 surface.
- 10 The expected rate of LMH construction at the cable landing site would be similar to that
- 11 for the analyzed Project (i.e., 2 days for each LMH); thus, LMH construction would occur
- 12 at any single location for approximately 2 workdays. Therefore, each sensitive receptor
- 13 (i.e., Fin's Seafood Restaurant, mobile home park, and residential recreational vehicle
- 14 park) would be affected by the noise for about 2 workdays.
- 15 For the second underground conduit system and associated intermediate manholes, the
- 16 revised Project would expose new sensitive receptors other than the ones affected by
- 17 construction of the underground conduit system in 2020 (Figures 1-2 and 3.2-1).
- 18 Typically, one to two intermediate manholes can be installed per day. Therefore, these
- 19 new sensitive receptors would be affected by temporary and intermittent noise for
- 20 approximately 0.5 to 1 day during intermediate manhole installation. For the revised
- 21 Project, terrestrial underground conduit construction activities and marine-based
- 22 construction activities would be expected to generate the same noise levels as the
- analyzed Project. These levels of noise would exceed the City's residential noise
- restriction limits, at distances up to 230 feet (Figure 3.2-1). Noise impacts of marine-
- 25 based construction activities on aquatic species would be reduced to a less than
- significant level through implementation of **MM BIO-10** (Prepare and Implement a
- 27 Marine Wildlife Monitoring and Contingency Plan). Potential terrestrial noise impacts
- would be reduced to a less than significant level with implementation of **MM NOI-1**
- 29 (Construction Noise Control Plan) and **MM NOI-2** (Construction Vibration Notification
- 30 and Disturbance Coordinator) as described in the MND, and no new mitigation is
- 31 required.

# 32 3.11.2 Operational Noise

- 33 Revised Project operations would not increase noise relative to the analyzed Project in
- 34 the MND, because the primary source of operational noise would still be mechanical
- 35 generators. These generators at the cable landing site would be used only during a
- 36 power loss, which is not expected to be a common occurrence, and during occasional
- 37 testing. As noted in the MND, existing generators at existing telecommunications
- 38 buildings would be used for back-up power. Thus, neither the analyzed Project nor the
- 39 revised Project would introduce these sources of noise.

- 1 The revised Project may include more maintenance and inspection activities, because
- 2 of the additional LMHs. It is likely that the routine vehicle trip identified in the MND
- 3 required for maintenance and inspection of the analyzed Project would accommodate
- 4 any increase in required maintenance and inspection activities. As noted in the MND,
- 5 the monthly single trip for maintenance and inspections would not noticeably affect
- 6 ambient noise levels. Therefore, the revised Project would not change operational noise
- 7 impacts from those described in the MND for the analyzed Project, and no new
- 8 mitigation is required.

# 9 3.11.3 Vibration

- 10 The revised Project would require temporary use of heavy construction equipment but
- 11 would not use impact equipment (e.g., pile drivers), as defined by the Federal Highway

12 Administration (FHWA 2006). Construction equipment for the revised Project would

13 generate ground-borne vibration like that described for the analyzed Project (see

14 Table 3.14-5 in the MND). Damage to buildings or structures during construction is not

15 anticipated because no extremely fragile historic buildings, ruins, or ancient monuments

- 16 are in the revised Project area.
- 17 As described in the MND, the revised Project also could result in operating construction
- 18 equipment as close as 25 feet from residences. The vibration levels generated by
- 19 construction equipment for the revised Project would be similar to those identified in the
- 20 MND for the analyzed Project. Although the vibration levels would be similar at
- 21 individual residences as those described for the analyzed Project, the revised Project
- would expose more residences to these vibration levels (Figure 3.2-1). At 25 feet,
- 23 vibration would be more than distinctly perceptible but less than strongly perceptible,
- based on the human response values in Table 3.14-7 in the MND.
- 25 Beyond 40 feet, ground-borne vibration would attenuate to levels that are less than
- 26 distinctly perceptible; and at 80 feet and greater, vibration would not be perceptible.
- 27 Construction activities for the revised Project within 80 feet of sensitive land uses may
- result in a violation of the City's municipal code. This impact is the same as that
- 29 described for the analyzed Project because the municipal code prohibits operation of
- 30 any device that creates a vibration above the perception threshold of an individual at the
- 31 property line. Implementing **MM NOI-2** (Construction Vibration Notification and
- 32 Disturbance Coordinator) as described in the MND would reduce the impact to a less
- than significant level by providing advance notice (via flyer) of construction to all
- 34 residences within 80 feet of construction and establishing a designated complaint
- 35 coordinator. No new mitigation is required.

# 36 3.11.4 Airport Noise

- 37 As discussed in the MND, the closest airport to the revised Project site is Oceano
- County Airport, which is owned by the County of San Luis Obispo. This is the only

- 1 airport located within 2 miles of the revised Project footprint. The part of the revised
- 2 Project closest to the airport (the cable landing station) also was the closest part of the
- 3 analyzed Project in the MND. As with the analyzed Project, the revised Project is
- 4 located outside of the 65-decibel noise contour line and thus would not be substantially
- 5 affected by single-event noise levels from the airport. No impact would be related to
- 6 excessive aircraft noise from public airports or private airstrips, and no mitigation is
- 7 required.

### 8 3.12 RECREATION

- 9 As discussed in the MND for the analyzed Project, no recreational facilities or residential
- 10 land uses would be used or built. Access to terrestrial recreational sites would remain
- 11 open and unaffected by the revised Project. Construction workers staying in the area
- 12 during non-working days could make occasional use of the area's recreational
- 13 opportunities but not to the extent that would cause substantial physical deterioration or
- 14 limit access to recreational facilities for residents.
- 15 Also as described in the MND, the revised Project would not affect clamming at Grover
- 16 Beach. However, offshore recreational activities (e.g., pleasure boating, recreational
- 17 fishing, and kayaking) may be affected for a short period in the immediate offshore area
- 18 during cable-laying activities. Implementing **MM REC-1** (Advanced Local Notice to
- 19 Mariners) would reduce temporary impacts on offshore recreational activities. The
- 20 revised Project would not result in new impacts on recreational facilities or activities.
- 21 Therefore, no new mitigation is required.

# 22 3.13 TRANSPORTATION/TRAFFIC

- 23 The revised Project could increase construction traffic slightly (from 1 to 2 trucks per
- 24 day plus up to 10 employee vehicles per day) from that analyzed in the MND due to the
- 25 need for additional resources (e.g., landing pipe, water, deliveries, and fuels) for
- 26 construction activities. This increase in traffic for materials delivery would not be
- 27 significant and would not affect any existing level of service designation or significantly
- 28 affect local traffic congestion.
- 29 The anticipated marine transportation would not change because of the revised Project.
- 30 Implementing MM REC-1 (Advanced Local Notice to Mariners) and APM-2 (Marine
- 31 Anchor Plan) as described in the MND would reduce potential impacts on terrestrial and
- 32 marine transportation to less than significant. The fishers in the area would be notified
- about the Project through **APM-1** (Fishing Agreement). A notification flyer would be
- 34 submitted to the Fishing Committee and all of their members in advance of construction.
- 35 The Fishing Committee members that represent the individual fishing associations in
- the area would forward notifications to their members. Therefore, no new mitigation is
- 37 required.

# 1 3.14 UTILITIES AND SERVICE SYSTEMS

- 2 As described in the MND, water would be used during construction for the boring
- 3 machine, dust suppression, and drinking water. The revised Project would increase the
- 4 water requirements for the extended drill operations for two additional landing pipes, but
- 5 not by a significant amount. As described in the MND for the analyzed Project, all water
- 6 supplies would be portable and brought onsite for the duration of revised Project
- 7 activities. Following Project completion, no additional water usage would be necessary.
- 8 Local water supplies would not be affected; therefore, the revised Project would not
- 9 result in new impacts related to utilities and service systems, and no mitigation is
- 10 required.

# 4.0 DETERMINATION/ADDENDUM CONCLUSION

1 As detailed in the analysis presented above, this Addendum adopted by the CSLC in 2 June 2020 (Item 50, June 23, 2020), as lead agency under CEQA, supports the 3 conclusion that the changes to the previously analyzed Project in the MND would not 4 result in any new significant environmental effects. Specifically, the CSLC has 5 determined, based on substantial evidence considering the whole record, that none of 6 the following circumstances exist: 7 Substantial changes proposed in the Project which will require major revisions of 8 the previous MND due to the involvement of new significant environmental 9 effects or a substantial increase in the severity of previously identified significant 10 effects (State CEQA Guidelines, §15162, subd. [a][1]). 11 Substantial changes that will occur with respect to the circumstances under 12 which the Project is undertaken which will require major revisions of the previous 13 MND due to the involvement of new significant environmental effects or a 14 substantial increase in the severity of previously identified significant effects 15 (State CEQA Guidelines, §15162, subd. [a][2]). 16 New information of substantial importance, which was not known and could not 17 have been known with the exercise of reasonable diligence at the time the

- have been known with the exercise of reasonable diligence at the time the
  previous MND was adopted by the CSLC (State CEQA Guidelines, § 15162,
  subd. [a][3]).
- 20 The revised Project is consistent with CEQA Guidelines §15164 in that none of the
- 21 conditions described in CEQA Guidelines §15162 have occurred. Therefore, the CSLC
- 22 has determined that no subsequent or supplemental negative declaration or
- 23 environmental impact report is required.

### **5.0 ADDENDUM PREPARATION SOURCES AND REFERENCES**

### 1 5.1 ADDENDUM PREPARERS

### 2 California State Lands Commission

- 3 Afifa Awan, Senior Environmental Scientist (Project Manager), Division of
- 4 Environmental Planning and Management (DEPM)
- 5 Nicole Dobroski, Chief, DEPM
- 6 Eric Gillies, Assistant Chief, DEPM
- 7 Drew Simpkin, Public Land Management Specialist
- 8 Andrew, Kershen, Staff Attorney, Legal Division
- 9 Joo Chai Wong, Associate Engineer, Mineral Resources Management Division

### 10 RTI Infrastructure, Inc.

- 11 Chris Brungardt, Vice President
- 12 Brian Bergfalk, Project Director
- 13 <u>ICF</u>
- 14 Tina Sorvari, Project Manager
- 15 Susan Bushnell, Regulatory/Permitting
- 16 James Alcorn, Environmental Planner
- 17 Laura Yoon, Air Quality and Greenhouse Gas Specialist
- 18 Cory Matsui, Noise Specialist
- 19 Steve Pappas, Cultural Resource Specialist
- 20 Steve Yonge, Wildlife Biologist
- 21 Sean O'Brien, Wildlife Biologist
- 22 Devin Jokerst, Botanist/Wetland Ecologist
- 23 Jesse Cherry, Publications Specialist

### 1 Applied Marine Sciences

2 Jay Johnson, Marine Scientist/Senior Oceanographer

### 3 MacFarlane Consulting

4 Heather MacFarlane, Marine Archaeologist

### 5 Egret, Inc.

6 Joan Lynn, Editor

### 7 5.2 REFERENCES

- 8 California State Lands Commission (CSLC). 2016. California State Lands Commission
- 9 Tribal Consultation Policy. Available: <u>https://www.slc.ca.gov/tribal-consultation/</u>.
- 10 Accessed March 3, 2020.
- Federal Highway Administration (FHWA). 2006. FHWA Roadway Construction Noise
   Model User's Guide. Final report. Cambridge, MA. January.
- 13 National Agriculture Imagery Program. 2020. NAIP Imagery ArcGIS server. Farm
- 14 Service Agency, United States Department of Agriculture, Salt Lake City, UT.
- Available at <u>https://gis.apfo.usda.gov/arcgis/rest/services/</u> Accessed on: February
   15, 2022.
- 17 San Luis Obispo County Air Pollution Control District (District). 2017. Clarifications
- 18 Memorandum for the San Luis Obispo County Air Pollution Control District's 2012
- 19 CEQA Air Quality Handbook. November 14.

### 20 **5.2.1 Personal Communication**

Kirkhuff, Vince. Air Quality Specialist. San Luis Obispo County Air Pollution Control
 District. June 10, 2019—email message to ICF.