

EXECUTIVE SUMMARY

1 This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by
2 the California State Lands Commission (CSLC), as lead agency under the
3 California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et
4 seq.), to analyze and disclose the environmental effects associated with the
5 proposed San Francisco Bay Fiber Optic Cables Project (Project). The Project
6 would authorize Bandwidth Infrastructure Group, LLC (Applicant or Bandwidth)
7 to build two nonlinear, parallel, and close-together fiber optic cables and
8 related infrastructure onshore (terrestrial) and across the San Francisco Bay
9 (SF Bay) (marine) between the cable landing sites in Brisbane in San Mateo
10 County (western SF Bay), and San Leandro in Alameda County (eastern SF Bay)
11 in California (Figures ES-1 and ES-2).

12 The CSLC prepared an MND because it determined that, while the IS identifies
13 potentially significant impacts related to the Project, mitigation measures (MMs)
14 incorporated into the Project proposal, and agreed to by the Applicant, will
15 avoid or mitigate those impacts to a point where no significant impacts occur.

PROPOSED PROJECT

17 The Applicant proposes to build two nonlinear, parallel, and close-together fiber
18 optic cables between the cable landing sites in Brisbane and San Leandro. A
19 majority of the Project components would be within the SF Bay under CSLC's
20 jurisdiction, which is generally below the ordinary high-water mark (OHWM).
21 Other Project components would be within the SF Bay but outside of CSLC's
22 jurisdiction (e.g., on legislatively granted tide and submerged lands or on
23 tidelands lots sold to private parties in the 1800s) or on land above the OHWM
24 (Figures ES-2, ES-3, and ES-4).

25 One new 8-inch (20-centimeter) diameter high-density polyethylene (HDPE)
26 conduit would be installed using the horizontal directional drilling (HDD) method
27 in the western SF Bay (Figure ES-3) and another of the same size would be
28 installed in the eastern SF Bay (Figure ES-4) to house these two fiber optic cables
29 near the shore. The HDPE conduit on the western side of the SF Bay would be
30 longer and deeper than the HDPE conduit on the eastern side of the SF Bay.
31 Once the HDPE conduits are installed, the fiber optic cables would be pulled
32 through them starting from the western side of the SF Bay and going toward the
33 eastern side of the SF Bay. The fiber optic cables would be in the HDPE conduits
34 from the terrestrial landing sites into the SF Bay and then the fiber optic cables
35 would be buried between 3 to 6 feet (1 to 2 meters) deep using a jetting sled

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1 starting from the western HDPE conduit and going toward the eastern HDPE
2 conduit across the SF Bay.

3 This Project would connect into a partially complete terrestrial cable network,
4 with independent utility from the Project analyzed in this MND.¹ The partially
5 complete terrestrial cable network extends throughout the SF Bay region and
6 would connect to the Project at the landing vaults. The Project would improve
7 capacity and speed of telecommunication data connectedness within the SF
8 Bay Area, and its surrounding region, by adding a physical fiber optic cable
9 connection across the SF Bay to the terrestrial cable network (Figures ES-2, ES-3,
10 and ES-4).

11 **PROJECT COMPONENTS**

12 Construction of the Project components is expected to begin in summer or fall
13 of 2023, and construction would take approximately 3 months:

- 14 • Two Cable Landing Sites: Each cable landing site would be used as a
15 staging area to park vehicles and store construction-related equipment
16 for terrestrial work, marine work, and HDD work to install the HDPE
17 conduits. An area approximately 66 feet by 66 feet (20 meters by
18 20 meters) would be used.
- 19 • Two Landing Vaults: A pre-cast concrete landing vault (12 feet long,
20 9 feet wide, and 10 feet deep [3.7 meters long, 2.7 meters wide, and
21 3 meters deep]) would be installed at each cable landing site, with a
22 cast-iron vault cover (36 inches [91 centimeters] in diameter) and buried
23 flush with the ground. The landing vaults would provide access to the
24 cables and HDPE conduits for maintenance activities. There would be no
25 aboveground structures associated with the Project.
- 26 • One Western HDPE Conduit: On the western side of SF Bay (in Brisbane), a
27 single 8-inch (20-centimeter) diameter HDPE conduit would be installed
28 using the HDD method from an entry pit (where the landing vault would
29 eventually be installed) and would exit within the SF Bay marine
30 environment. This HDPE conduit would be from approximately 686 to
31 2,731 feet (209 to 832 meters) long depending on the route selected. Final

¹ The Applicant (Corporate ID U7336C) will complete this terrestrial network project under California Public Utilities Commission (CPUC) authorizations. The CPUC has issued a Notice to Proceed for the network connection at the eastern landing vault in San Leandro. A Notice to Proceed is anticipated from the CPUC in April 2023 for the network connection to the western landing vault in Brisbane.

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1 route selection and HDPE conduit length may vary to avoid existing utilities
2 (Figure ES-3) and associated pipeline crossing agreements with existing
3 utility owners. The HDPE conduit would exit at a location in the SF Bay
4 where water depth at mean lower low tide is approximately 5 feet
5 (1.5 meters). The marine end of the HDPE conduit would be buried under
6 5 feet (1.5 meters) of sediment during and after installation, except when
7 exposed to pull the fiber optic cables through. The western HDPE conduit
8 would be installed from the bottom of the landing vault, approximately
9 6.5 feet (2 meters) below ground surface, toward the SF Bay transiting at a
10 possible maximum depth of 66 feet (20 meters) using the HDD method to
11 the exit point within the SF Bay.

- 12 • One Eastern HDPE Conduit: On the eastern side of SF Bay (in San
13 Leandro), a single 8-inch (20-centimeter) diameter HDPE conduit would
14 be installed from an entry pit also exiting into the SF Bay. The eastern HDPE
15 conduit would be approximately 150 to 325 feet (50 to 100 meters) long
16 and would exit at a water depth of 0 foot (0 meter) at mean lower low
17 tide, which would be buried under 5 feet (1.5 meters) of nearshore
18 sediment during and after installation except when exposed to pull the
19 fiber optic cables through. The eastern HDPE conduit would be installed
20 from the bottom of the landing vault, approximately 6.5 feet (2 meters)
21 below ground surface, towards the SF Bay transiting at a possible
22 maximum depth of 30 feet (9 meters) using the HDD method to avoid any
23 utilities, such as the East Bay Dischargers Authority 96-inch force main, to
24 an the exit point within the SF Bay (Figure ES-4).
- 25 • Two Fiber Optic Cables: Once the HDPE conduits are installed, then the
26 fiber optic cables would be pulled through the HDPE conduits and housed
27 in them in the nearshore environment to the exit point in SF Bay. Once
28 outside of the conduit (past the exit point), the rest of the fiber optic
29 cables would be buried 3 to 6 feet (1 to 2 meters) deep in the SF Bay floor
30 using a cable-lay vessel (with the help of two anchor-lay vessels) and
31 jetting sled. The buried cables would not be housed in an HDPE conduit. A
32 jetting sled is a burial tool that would be deployed by the cable-lay vessel
33 where water depth allows for its use across the majority of the SF Bay fiber
34 optic cables route. Close to the HDD exit points, where the SF Bay is too
35 shallow for the jetting sled, the fiber optic cables would be installed by
36 divers (with a dive support boat) with hand-jetting techniques.

1 **Western Cable Landing Site**

2 There would be four possible alternative landing sites for the western cable
3 landing site (Figure ES-3). The exact location cannot be finalized now due to the
4 local utilities' complexities, road infrastructure, and multiple land ownership.
5 However, the Applicant expects the "Proposed Western Cable Landing Site" as
6 explained below to be selected. If that site is not possible, then one of the three
7 alternative sites would be selected:

- 8 • **Proposed Western Cable Landing Site**, in Brisbane, at coordinates
9 37°41'22.09" N and 122°23'30.59" W. This site is along the Bay Trail at the
10 southern corner of Lagoon Road and Sierra Point Parkway in Brisbane in
11 an unoccupied area. The offshore HDPE conduit exit point would be
12 approximately 2,519 feet (768 meters) from the landing vault and in
13 approximately 5 feet (1.5 meters) water depth in the SF Bay.

14 This site was part of a formal landfill parcel where landfill operation ended
15 in 1960s. All landfill material is located approximately 200 feet (61 meters)
16 northwest of the landing site, north of Lagoon Road.

- 17 • **Alternative 1**, in Brisbane, at coordinates 37°41'19.42" N and
18 122°23'30.15" W. Alternative 1 is located 270 feet due south of the
19 southern corner of Lagoon Road and Sierra Point Parkway in Brisbane. The
20 HDPE conduit exit point would be 2,731 feet (832 meters) from the landing
21 vault and in approximately 5 feet (1.5 meters) water depth in the SF Bay.

22 This site was also part of a formal landfill parcel where landfill operation
23 ended in 1960s. All landfill material is located approximately 200 feet
24 (61 meters) northwest of the landing site, north of Lagoon Road.

- 25 • **Alternative 2**, in Brisbane, at coordinates 37°41'19.55" N and
26 122°23'27.62" W. Alternative 2 is located on a narrow parcel of land
27 between the Bayshore Freeway and Sierra Point Parkway in Brisbane. The
28 HDPE conduit exit point would be 686 feet (209 meters) from the landing
29 vault and in approximately 5 feet (1.5 meters) water depth in the SF Bay.

- 30 • **Alternative 3**, in Brisbane, at coordinates 37°41'15.11" N and
31 122°23'26.23" W. Alternative 3 is located on a narrow parcel of land
32 between the Bayshore Freeway and Sierra Point Parkway in Brisbane. The
33 HDPE conduit exit point would be 1,640 feet (500 meters) from the landing
34 vault and in approximately 5 feet (1.5 meters) water depth in the SF Bay.

1 **Eastern Cable Landing Site**

2 The eastern cable landing site would be along the Bay Trail at coordinates
3 37°41'14.48" N and 122°10'50.82" W, west of the Tony Lema Golf Course and
4 south of the Marina Dog Park within an unoccupied area (Figure ES-4). The
5 planned HDPE conduit and HDD exit point would be approximately 150 to
6 325 feet (50 to 100 meters) from the landing vault and would exit at a water
7 depth of 0 foot (0 meter) at mean lower low tide. The HDPE conduit would be
8 buried under 5 feet (1.5 meters) of nearshore sediment during and after installing
9 the conduit except when exposed to pull the fiber optic cables through.

Figure ES-1. Project Vicinity



Figure ES-2. Project Site Location

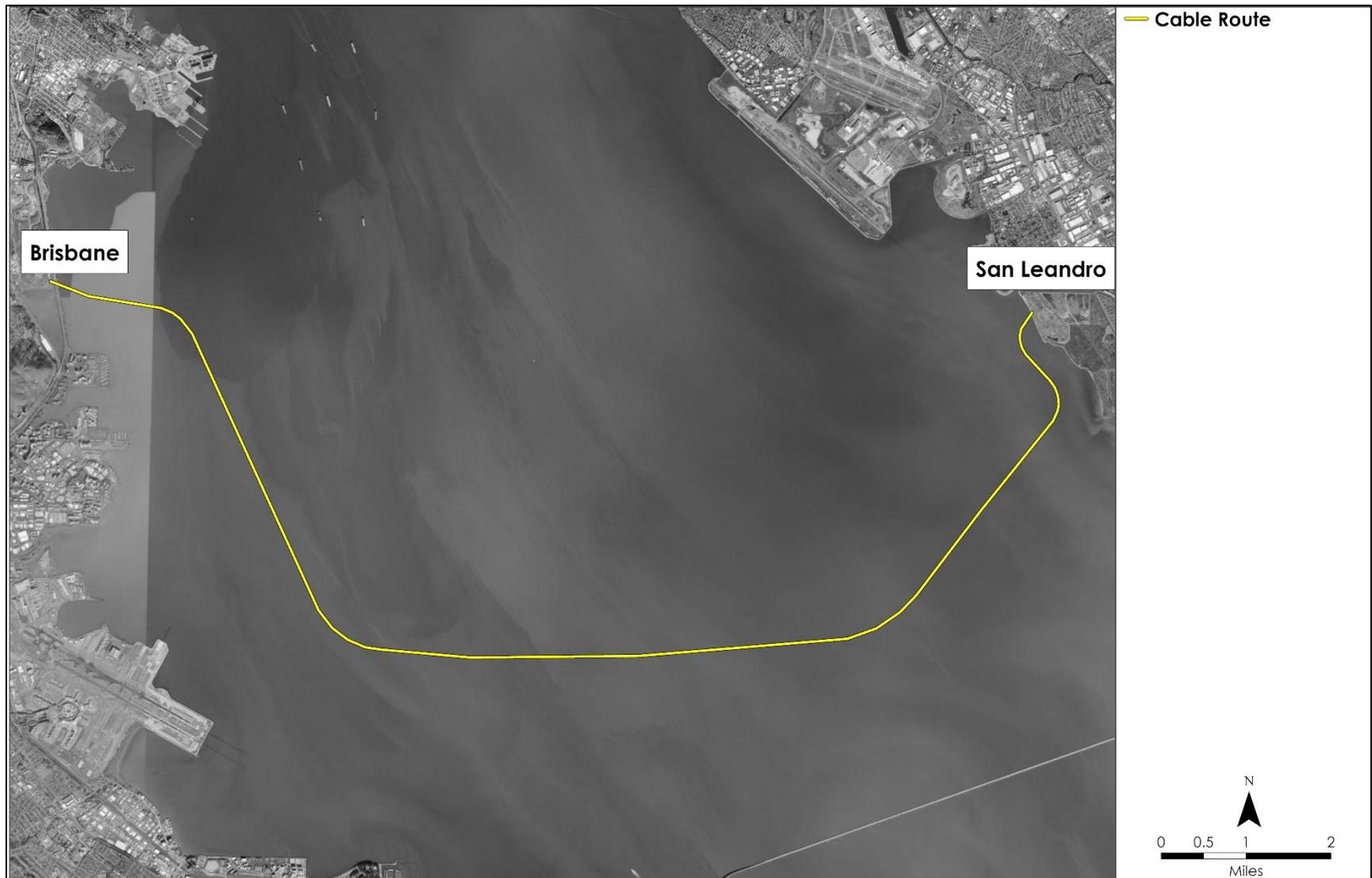


Figure ES-3. Western Cable Landing Site

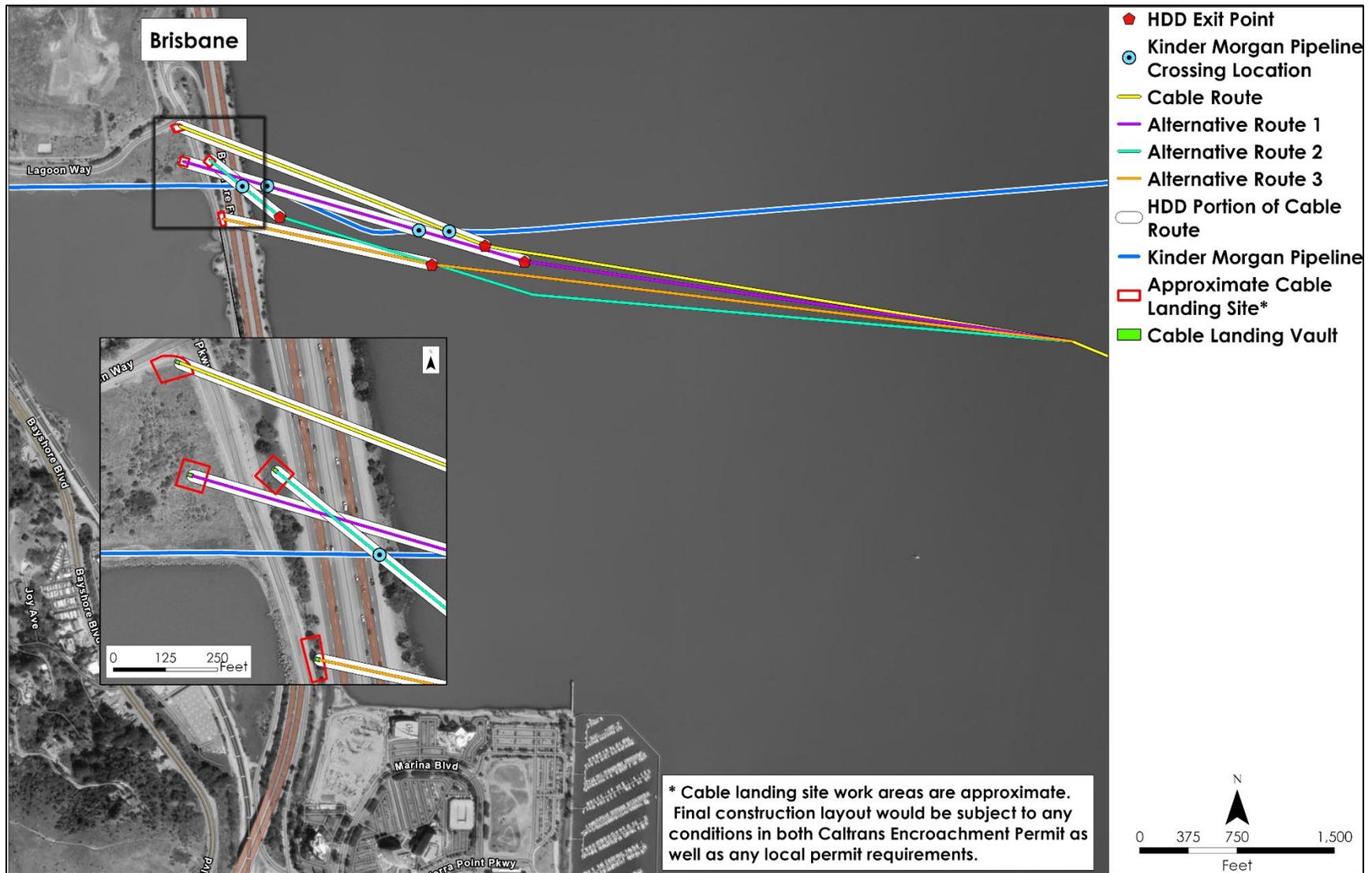


Figure ES-4. Eastern Cable Landing Site



ENVIRONMENTAL IMPACTS AND PROPOSED MITIGATION MEASURES

The environmental issues listed below under the “Environmental Issues with Potentially Significant Impacts” are resource areas with at least one impact that would be a “potentially significant impact.”

Environmental Issues with Potentially Significant Impacts:

- Air Quality
- Biological Resources
- Cultural Resources
- Cultural Resources – Tribal
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise
- Hydrology and Water Quality
- Recreation
- Transportation
- Mandatory Findings of Significance

The environmental issues listed below under the “Environmental Issues Without Potentially Significant Impacts” are resource areas that do not have any impacts that would be considered potentially significant.

Environmental Issues Without Potentially Significant Impacts:

- Aesthetics
- Agriculture and Forestry Resources
- Energy
- Geology, Soils, and Paleontological Resources
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Utilities and Service Systems
- Wildfire

The Applicant has agreed to Project revisions, including the implementation of MMs that would reduce potentially significant impacts to “less than significant with mitigation,” as detailed in Section 3.0, Environmental Checklist and Analysis, of this MND.

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Table ES-1 lists the proposed MMs designed to reduce or avoid potentially significant impacts. With implementation of the proposed MMs, Project-related impacts would be reduced to less than significant levels.

Table ES-1. Summary of Proposed Project Mitigation Measures (MM)

Proposed Project Mitigation Measures
Air Quality
MM AIR-1: Use of Tier 4 Equipment
MM AIR-2: Standard Control Measures for Construction Equipment
MM AIR-3 : Minimize Fugitive Dust
Biological Resources
MM BIO-1: Provide Worker 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 Covers or Escape Ramps in Open Trenches
MM BIO-5: Conduct Pre-Construction Nesting Bird Surveys and Implement Avoidance Measures
MM BIO-6: In-Water Work Window
MM BIO-7: Fish Screen on the Jet Sled Intake
MM BIO-8: Cable Burial Surveys
MM BIO-9: Cable Entanglements and Gear Retrieval
MM BIO-10: Control of Marine Invasive Species
MM HYD-1: Develop and Implement Stormwater Pollution Prevention Plan
MM HAZ-1: Develop and Implement Spill Contingency and Hazardous Materials Management Plans
MM HAZ-2: Prepare and Implement an Inadvertent Return Contingency Plan
Cultural Resources
MM CUL-1/TCR-1: Discovery of Previously Unknown Cultural or Tribal Cultural Resources
MM CUL-2/TCR-2: Unanticipated Discovery of Human Remains
MM CUL-3/TCR-3: Cultural and Tribal Resources Awareness Training
Cultural Resources - Tribal
MM CUL-1/TCR-1: Discovery of Previously Unknown Cultural or Tribal Cultural Resources
MM CUL-2/TCR-2: Unanticipated Discovery of Human Remains
MM CUL-3/TCR-3: Cultural and Tribal Resources Awareness Training
Greenhouse Gas Emissions
MM AIR-1: Use of Tier 4 Equipment
MM AIR-2: Standard Control Measures for Construction Equipment

Proposed Project Mitigation Measures
Hazards and Hazardous Materials
MM HAZ-1: Develop and Implement Spill Contingency and Hazardous Materials Management Plans
MM HAZ-2 : Prepare and Implement an Inadvertent Return Contingency Plan
MM BIO-1: Provide Worker Environmental Awareness Training
MM BIO-3: Delineate Work Limits to Protect Sensitive Biological Resources
Hydrology and Water Quality
MM HYD-1: Develop and Implement Stormwater Pollution Prevention Plan
MM HAZ-1: Develop and Implement Spill Contingency and Hazardous Materials Management Plans
MM HAZ-2: Prepare and Implement an Inadvertent Return Contingency Plan
Noise
MM NOI-1: Implement Construction Noise Control Measures
Recreation
MM REC-1: Advanced Local Notice to Mariners
Transportation
MM TRA-1: Marine Anchor Plan
MM TRA-2: Traffic Control Plan
MM REC-1: Advanced Local Notice to Mariners
Commercial and Recreation Fishing
MM BIO-6: In-Water Work Window
MM BIO-7: Fish Screen on the Jet Sled Intake
MM BIO-8: Cable Burial Surveys
MM BIO-9: Cable Entanglements and Gear Retrieval
MM BIO-10: Control of Marine Invasive Species
MM REC-1: Advanced Local Notice to Mariners
MM TRA-1: Marine Anchor Plan