EXECUTIVE SUMMARY

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the California State Lands Commission (CSLC), as lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.), to analyze and disclose the environmental effects associated with the proposed AT&T Japan-U.S. Cable Network Decommissioning (JUS S8 and JUS S9 Cables) (Project). The Project would authorize AT&T Enterprises, LLC (AT&T) (Applicant) to decommission Segments S8 and S9 (JUS S8 and S9) of the Japan-US Cable Network's submarine fiber optic telecommunication cable system.

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

PROPOSED PROJECT

AT&T is proposing to decommission JUS S8 and S9 of the Japan-US Cable Network's submarine fiber optic telecommunication cable system. While AT&T's overall project would take place across the Pacific Ocean between Japan and California, including both federal and international waters, the limit of California's jurisdiction is out to the state's offshore boundary that is located approximately 3 nautical miles (nm) offshore Mendocino and San Luis Obispo Counties (Figure ES-1). As a result, the cable decommissioning occurring in both international and federal waters (between California's offshore boundary (3 nm) and the 1000-fathom contour), while part of AT&T's overall project, is outside the scope of all impacts analyzed in this IS/MND except for Air Quality (Section 3.3) and Greenhouse Gas Emissions (Section 3.9). For these two resource areas, the IS/MND analyzes impacts within the San Luis Obispo County Air Pollution Control District's asserted CEQA authority to regulate air quality emissions out to California's Coastal Waters boundary (17 CCR 70500), which extends approximately 38 nautical miles offshore from Morro Bay.

The Project work areas (Figure ES-2) are primarily located onshore and offshore San Luis Obispo County and offshore Mendocino County. JUS S9 Montaña work activities would include open water cable recovery, onshore cable cutting, and dive support vessel (DSV) operations for cable excavation and cutting and

conduit cable removal. JUS S9 Manchester and JUS S8 work activities would include DSV operations for cable excavation and cutting as well as open water cable recovery.

The resources noted below have the potential to be affected by this Project and have at least one impact that would be a "potentially significant impact." The Applicant has agreed to the implementation of MMs that would reduce the potential impacts to "less than significant with mitigation," as detailed in Section 3, Environmental Checklist and Analysis, of this MND. Appendix F, Mitigation Monitoring Program, outlines the proposed mitigation measures designed to reduce or avoid potentially significant impacts. With implementation of the proposed mitigation measures, all Project-related impacts would be reduced to less than significant.

Environmental Issues with Potentially Significant Impacts:

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

Summary of Proposed Project Mitigation Measures:

Air Quality

- MM AQ-1a: Reactive Organic Gases (ROG) + Nitrogen Oxides (NO_X) and Diesel Particulate Matter (DPM) Emission Offset Credits - San Luis Obispo Air Pollution Control District (SLOAPCD)

- MM AQ-1b: Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_X) Emission Offset Credits – Mendocino County Air Quality Management District (MCAQMD)

Biological Resources

- MM BIO-1: Pre-Activity Worker Environmental Training
- MM BIO-2: National Marine Fisheries Service (NMFS) – Approved Wildlife Monitor
- MM BIO-3: Modify Vessel Operations
- MM BIO-4: Avoid Anchor Impacts to Marine Wildlife
- MM BIO-5: Vessel Lighting
- MM BIO-6: Marine Safety and Anchoring Plan
- MM HAZ-1: Vessel Waste Management Plan
- MM HAZ-2: Shipboard Oil Pollution Emergency Plan

Cultural Resources

- MM CUL-1: Prepare and Implement an Avoidance Plan for Marine Archaeological Resources
- MM CUL-2: Unanticipated Discovery of Human Remains

Cultural Resources – Tribal

- MM TCR-1: Tribal Cultural Awareness Training

Hazards and Hazardous Materials

- MM HAZ-1: Vessel Waste Management Plan
- MM HAZ-2: Shipboard Oil Pollution Emergency Plan

Hydrology and Water Quality

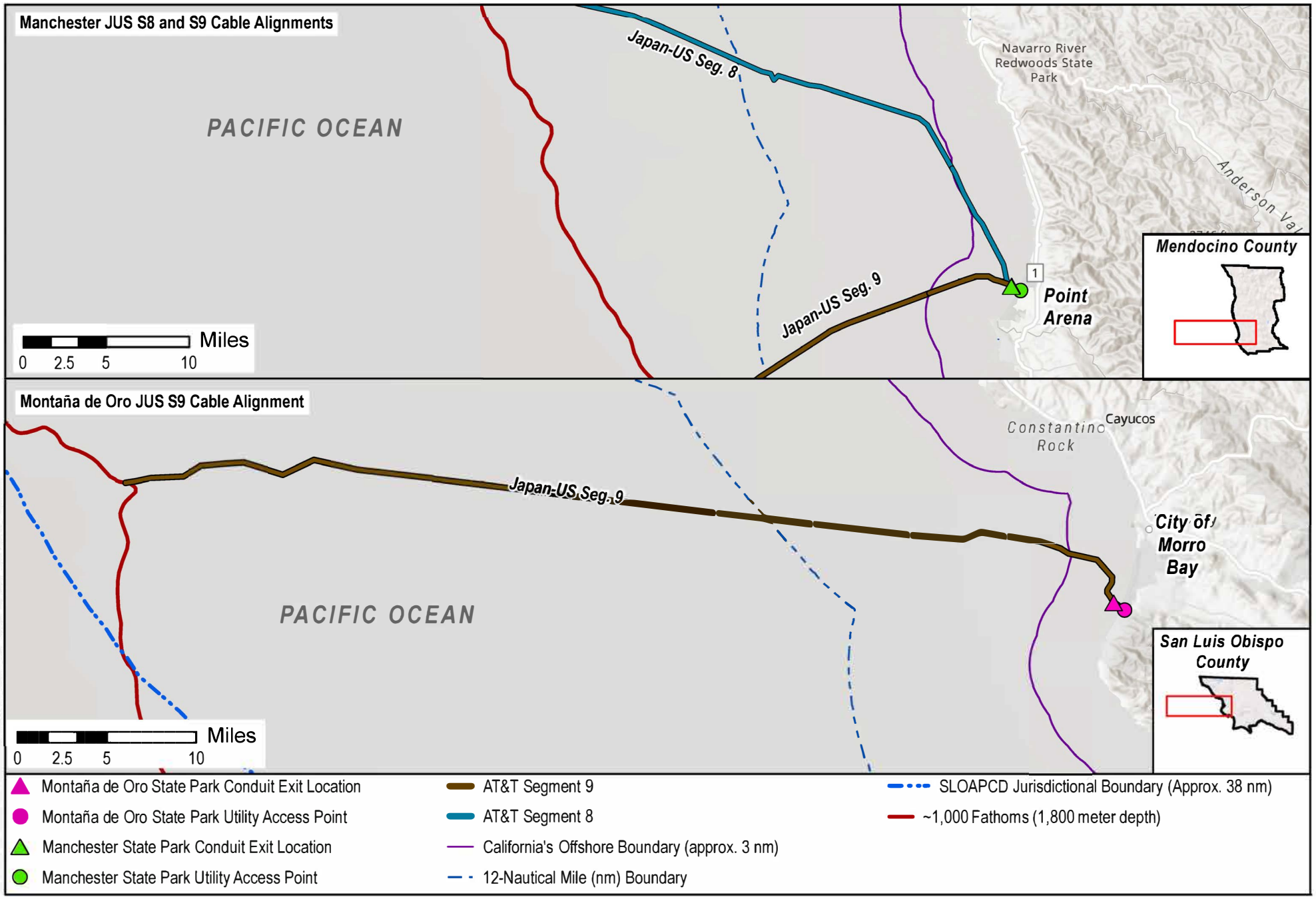
- MM HAZ-1: Vessel Waste Management Plan
- MM HAZ-2: Shipboard Oil Pollution Emergency Plan

Recreation

- MM REC-1: Advanced Local Notice to Mariners
- MM REC-2: Advanced Notice to Ocean Users

Transportation

- MM REC-1: Advanced Local Notice to Mariners



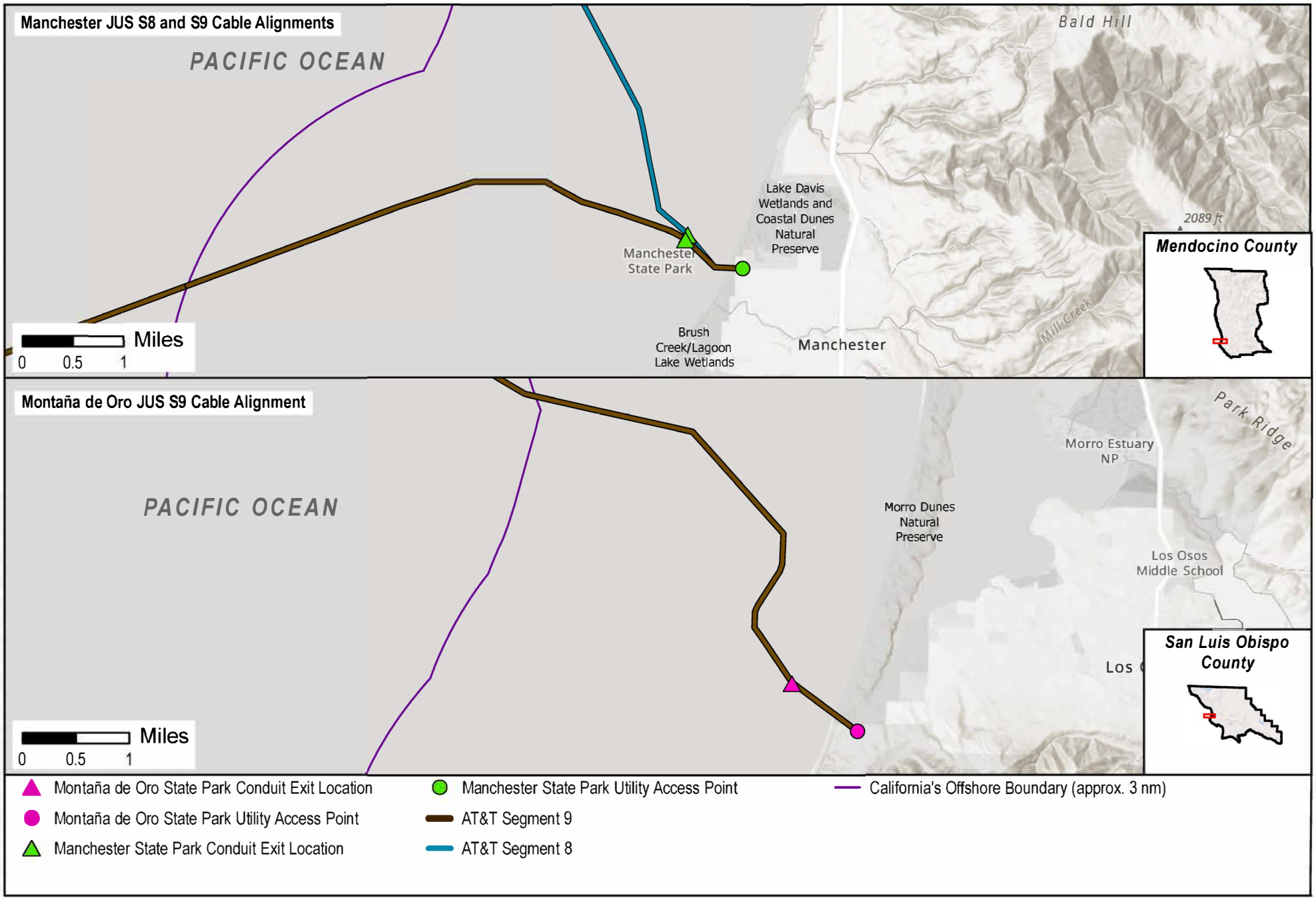
SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

FIGURE ES-1

Project Vicinity

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK



SOURCE: Padre Associates, Inc. 2024, ESRI Basemap (accessed 2025)

FIGURE ES-2

Project Work Areas

AT&T Japan- U.S. Cable Network Decommissioning

DUDEK