Strategic Action Plan for Digital Equity
Outline for Local Governments
July 2022

I. Purpose

A. Set forth the Findings and Declarations of the Local Government Board or Council, such as:
   1. It is an imperative to close the Digital Divide (the Challenge) through Digital Inclusion (the Process) to achieve Digital Equity (the Result).
   2. Digital Divide is another manifestation of the Economic Divide, Wealth Gap, and Opportunity Gulf associated with concentrated and persistent poverty rooted in systemic racism. Thus, closing the Digital Divide requires a comprehensive, integrated set of strategies that institutionalizes Digital Inclusion to achieve Digital Equity.
   3. Digital Equity is a 21st Century Civil Right.

B. State the purpose of the Strategic Action Plan for the Local Government.

C. Describe how it is to be implemented and used by the Local Government.

II. Overview

A. Describe the nature and impact of the Digital Divide in the Local Government jurisdiction.
   1. Explain how the Digital Divide impacts the public and private sectors, especially the low-income and other digitally-disadvantaged residents.
   2. Acknowledge the 2 Complementary Dimensions of the Digital Divide:
      a. Deployment: Deployment is the construction of broadband infrastructure. Broadband is a generic term for high-speed Internet infrastructure including wireline and wireless networks and technologies. It is necessary by not sufficient to close the Digital Divide and achieve Digital Equity.
      b. Adoption: Adoption is the process of enabling households to harness the power of technology to save time and money and improve their lives (see below the description of Adoption). Increasing adoption rates (or subscriptions to Internet service, referred to as "take rates" of broadband deployment) supports the economic viability of deployment.

B. Summarize history of Local Government leadership to address the Digital Divide, promote Digital Inclusion, and achieve Digital Equity (to provide perspective and context). Reference existing policies and ordinances and include them in Section XII Attachments.

C. Discuss the Roles of Local Governments (see attached description of the 5 Roles):
   1. Policy Leader
   2. Planner
   3. Regulator
   4. Consumer
   5. Service Provider

III. Summary of Needs and Challenges

A. Deployment: Review existing data sources to quantify number of Unserved and Underserved households (HHs), anchor institutions, and other locations in the local jurisdiction to prepare a "Map of Needs and Opportunities" with identified Public Assets. ["Unserved" is defined in State law and CPUC regulations as locations with less than 25/3 Mbps. Given that the State and CPUC standards for deployment is > 100/20 Mbps, Underserved can be considered locations between 25/3 Mbps and 100/20 Mbps.]

1. CPUC Maps: 25/3 Mbps and 100/20 Mbps (CSU Chico North State Planning and Development Collaborative is a source—see below for contact information).
2. Other Relevant Data and Information (such as number and approximate locations of hotspots distributed by School Districts to support distance learning (as an indication of insufficient broadband infrastructure and/or inability to afford home Internet service).

   Work Products (20-40 hours: to be completed by existing staff within 60-90 days):
   a. Map of Needs and Opportunities with Public Assets (see below) with number of Unserved and Underserved HHs, anchor institutions, and other locations.
   b. Inventory Public Assets (and identified on the Map of Needs and Opportunities).

   [Public Assets include: ROWs; light poles; traffic light standards; public property for co-location; and other utilities conduits such as for water or sewer.]

B. Adoption: Review existing data sources to quantify the number of Unconnected (no home Internet connection) and Underconnected (smartphone only Internet access) HHs in the Local Government jurisdiction and prepare an analysis (which may be a range from various sources to inform setting Goals).

1. Statewide Survey on Broadband Adoption (see 2021 Statewide Survey data below which can be applied to any Local Government populations for reliable estimates).
2. Census Data – America Community Survey (ACS)
3. Pew Charitable Trusts Surveys
4. California Department of Technology (CDT) ACP Enrollment Tracker (or IFAN Tracker).
5. Number of HHs on Medi-Cal and CalFresh per the County; and number of students eligible for National School Lunch Program (NSLP) by School District per the County Office of Education (COE).

   Work Products (20-40 hours: to be completed by existing staff within 60-90 days):
   a. Table of Data of Unconnected and Underconnected HHs from data sources.
   b. Estimate of range of Unconnected and Underconnected HHs (in inform Goals).

IV. Goals

A. Qualitative Goals

1. Ubiquitous Deployment: Ensure all households and other locations have access to high-speed Internet infrastructure sufficient to support all economic endeavors (user demand) with sufficient speeds at all times to enable and support distance learning and telehealth for all residents. Other locations (customers) include: public safety agencies; anchor institutions (schools, libraries, health and medical facilities, community centers); small businesses (especially in low-income neighborhoods); central business districts; and research institutions.

2. Universal Adoption: Assist all residents, particularly low-income households, get connected at home to high-speed Internet service that is affordable with an appropriate computing device and sufficient digital literacy proficiency to help improve their lives (save time and money). Assist other customers, especially small businesses in low-income neighborhoods, to become digitally proficient.

B. Quantitative Goals
   1. Achieve Ubiquitous Deployment (<100%) by 20XX (set interim milestones for 2024 and 2027).
   2. Achieve Universal Adoption (<100%) by 20XX (90% of ACP-eligible households by 2024; 95% of ACP-eligible households by 2027 to align with State Goals).

V. Deployment Strategies to Achieve Goals

A. Adopt an Overall Policy and/or General Plan Element to establish the perspective of the Local Government to achieve Ubiquitous Deployment in the public interest and to promote high-speed Internet infrastructure as a "green strategy" (see *Resource Guide* for a template to customize for the Local Government). [An Overall Policy provides a foundation for development and implementation of other Deployment Strategies while a General Plan Element is being prepared along with a Programmatic Environmental Impact Report (EIR)—see discussion below. The Map of Needs and Opportunities is a logical exhibit for the Overall Policy and/or General Plan Element.]

B. Identify, develop and advance high-speed Internet infrastructure Last-Mile Projects to the "hardest-to-reach" Unserved and Underserved areas: rural, remote communities, including Tribal Lands; and high-poverty urban neighborhoods.
   1. Identify >3 Priority Areas for Last-Mile Projects by analyzing data and obtaining input from stakeholders and residents. Prepare a Priority Area Map based on the Map of Needs and Opportunities and any available additional information for an "at scale" Last-Mile Project and quantify the number of Unserved last-mile HHs (including residences on Tribal Lands), anchor institutions, and other locations. The term "at scale" refers to a project which deploys to all last-mile locations that can be reached and served by a given middle-mile network segment. Quantify the number of Underserved HHs, anchor institutions, and other locations in the Priority Area. Quantification of Unserved and Underserved HHs, anchor institutions, and other locations may need to be an estimate based on available information. [Don't worry about whether or not there are perfect maps and don't let that delay development of Last-Mile Projects. By focusing on the hardest-to-reach areas and engaging stakeholders, the process will reveal and verify Unserved and Underserved areas.]
   2. Develop and release an open, competitive "Invitation" to all interested private and public Internet Service Providers (ISPs) to submit Last-Mile Project Proposals based on the Priority Area Maps. [The open, competitive Invitation can be similar to the Request for Qualifications for Prospective Process (RFQPP) used by Metropolitan Planning Organizations (MPOs) San Diego Association of Governments (SANDAG) and Southern California Association of Governments (SCAG) as well as the collaboration between the San Joaquin Valley Regional Broadband Consortium (SJVRBC) and the California Emerging Technology Fund (CETF) referred to as #SanJoaquinValleyNetwork.

A Rural County also may want to participate in the process led and managed by the Rural County Representatives of California (RCRC). Whatever approach is used by the Local Government, it ultimately needs to obtain Last-Mile Project Proposals from both public and private ISPs through a transparent and fair process to serve the public interest.] The Invitation should reserve the right to accept one or more Last-Mile Project Proposals, negotiate among ISPs for a collaborative joint venture, or reject all Proposals. The Invitation should require Last-Mile Project Proposals to include the following information, which all can be subject to non-disclosure agreements (NDAs):

- Number of Unserved and Underserved HHs, anchor institutions, and other locations to be reached (or reaffirm quantification for the Priority Area Map).
- Path(s) of deployment with a description of the infrastructure technology to be used, specification of the number of miles of infrastructure, statement of the construction costs per appropriate unit (such as per foot, meter, mile), and an estimate of the total cost of the Project (set forth for Unserved and Underserved HHs, anchor institutions, and other locations).
- Discussion of how the Last-Mile Project will relate and/or connect to the State Middle-Mile Network (referred to as GoldenStateNet or GSN, a wholly-owned subsidiary of CENIC as the third-party administrator), including whether or not the ISP proposes to: (a) use any of its own existing middle-mile facilities to save public funds; (b) build any or all of the relevant GSN middle-mile segments; or (c) just connect to GSN when constructed without constructing any new middle miles. Special attention to should be given to analyzing whether or not the Local Government's Last-Mile Project Areas are served by the GSN first 18 Projects and to inform CDT about the results of the analysis.
- Delineation of the construction timetable.
- Commitment to adoption activities that will be implemented and/or funded in conjunction with construction of the Last-Mile Project.

3. Negotiate with ISPs to develop relatively-detailed Last-Mile Project Proposals, secure written "agreements of commitments and cooperation" to work together to prepare Applications for public funding for the Last-Mile Projects.
4. Confer with CDT and CENIC to help prioritize GSN investments based on Local Government Priority Areas and Last-Mile Projects. Determine which middle-mile segments essential for the Last-Mile Projects will be built and/or funded by GSN and which should be included in the Last-Mile Project Applications for public funding.
5. Engage with the California Public Utilities Commission (CPUC) Communications Division (CD) to discuss and reach consensus on the priorities for Last-Mile Projects to receive California Advanced Services Fund (CASF) initial $5M per County from $2B in CASF Federal Funding Account (FFA) per SB156 (see reference below).
6. Assist ISPs in preparing Last-Mile Project Applications for public funding.
7. Help secure Last-Mile Project approvals and permitting from public agencies. This step for securing public funding for Last-Mile Projects to the hardest-to-reach areas can be supported by a separate effort to streamline all project approvals and permitting for deployment of high-speed Internet infrastructure, with priority attention to deployment projects that serve Unserved and Underserved HHs.

C. Promote additional networks and technologies to augment Last-Mile Projects as needed or relevant for the Local Government.
    1. 5G: Assess private-sector demand for 5G deployment (which requires a robust fiber infrastructure to support wireless transmissions). Consider inviting invitations from ISPs and negotiating agreements to provide a revenue stream from small-cell installations to support staff to facilitate deployment and fund grants to non-profit community-based organizations (CBOs) to achieve Adoptions. [Establish what economists call a "virtuous circle" of collaborative ecosystem in the context of a sincere public-private partnership (economically-productive partnership). Consider the example of the City of San José Digital inclusion Fund capitalized by fees from 5G deployment and the San José Digital Inclusion Partnership.]
    2. Public WiFi: Determine if there is a need for public WiFi in low-income neighborhoods and how such a network could be supported.
    3. Satellite: Become familiar with low-earth orbit (LEO) satellite constellation technologies and options to determine if there is a public service subscription application and/or other funding stream to test the service quality and cost-effectiveness.
D. Ensure that all Publicly-Subsidized Housing Complexes (government housing authorities and non-profit affordable housing organizations) get high-speed Internet infrastructure installed in all housing units and encourage them to arrange for digital literacy training.
    1. Reach out to Publicly-Subsidized Housing Complexes in the Local Government jurisdiction to inform them about the CPUC CASF Public Housing Account (PHA) grants.
    2. Convene workshops to provide technical assistance to all Publicly-Subsidized Housing Complexes in preparing Applications for CASF PHA grants.
    3. Facilitate a "Learning Community" among Publicly-Subsidized Housing Complexes to coach one another, share Lessons Learned, and provide peer accountability for results.
E. Develop and adopt a process for streamlining broadband project and permitting, especially deployment to the hardest-to-reach areas as discussed above. Embrace a general objective to approve and permit priority deployment projects as fast as ISPs can build ("public permitting at the speed of private construction").
F. Set forth other Deployment Strategies as appropriate (review Check List for Digital Equity).

VI. Adoption Strategies to Achieve Goals

A. Adopt an Overall Policy to establish the perspective of the Local Government to achieve Universal Adoption in the public interest and direct all departments, agencies, and programs to incorporate Digital Inclusion into all public services as a commitment to Digital Equity. Recognize that the best opportunity for low-income HHs to subscribe to affordable home Internet service is the federal Affordable Connectivity Program (ACP) administered by the Federal Communications Commission (FCC). ACP provides a $30 per month subsidy on an Internet subscription for a qualifying HH ($75 on Tribal Lands) plus a $100 credit for a computing device (Cox Communications currently is the only ISP in California offering that ACP benefit). Acknowledge that an Adoption starts by getting an unconnected low-income household online and that a "full" Adoption must address and overcome all 3 barriers for low-income households (see below the definition and description of an Adoption).

- Cost (including the cost for both Internet service and appropriate computing device).
- Relevance (reason why outreach in-language and in-culture by "trusted messengers" (often referred to as "Digital Navigators") is essential to explain to unconnected low-income HHs how they will benefit from being connected at home to the Internet).
- Digital Literacy (no one will subscribe to service and acquire a device if they don't know how to use it to navigate the Internet).

B. Develop and implement a plan to reach all ACP-Eligible HHs in the Local Government jurisdiction to notify them about ACP and inform them about how to enroll. Request the County (appropriate departments) to notify all Medi-Cal and CalFresh recipients about ACP and request the COE to engage all School Districts to notify all NSLP students-families about ACP (90% of ACP-Eligible HHs are in these 3 Big Populations). Reach out to higher education institutions to notify all Pell Grant recipients about ACP.

C. Develop and implement a public awareness campaign about ACP targeting community and ethnic media channels. Seek shared funding from public agencies, ISPs, and philanthropy. Increased awareness through targeted media is key to augmenting the direct outreach to ACP-Eligible HHs.

D. Distribute information about ACP through all other Local Government communications channels, such as: all public services and programs reaching low-income residents; community newsletters; utility bills or other service notifications in targeted low-income census tracts or zip codes; government and community access video channels; and licenses for small businesses in low-income neighborhoods so they can notify customers.

E. Organize and host ACP Enrollment Events (>20% of ACP-eligible HHs will need assistance to sign up for ACP) and incorporate ACP promotion during other community gatherings. Encourage ISPs to provide computing devices for ACP Enrollment Events and collaborate with and fund CBOs to do outreach in-language and in-culture.

F. Convene workshops to inform and assist CBOs to apply for CPUC CASF Adoption Account grants to provide digital literacy training to ACP enrollees (to achieve "full" Adoptions). Use the Digital Literacy Framework based on the UNESCO 6 Elements and the associated Self-Assessment Tool for pre- and post- evaluations of digital proficiency (see attached). Convene and facilitate a Learning Community among CBOs to coach one another, share Lessons Learned, and provide peer accountability for results.

G. Consider developing a workforce training program to recruit digitally-disadvantaged low-income residents to help implement both Deployment and Adoption Strategies.

H. Set forth other Adoption Strategies as appropriate (review Check List for Digital Equity).

VII. Work Plan and Budget

A. Prepare a simple Work Plan setting forth the above Deployment and Adoption Strategies with specific related Activities in a Timetable with Assigned Responsible Personnel. Focus on launching Strategies and making significant progress in Year 1 (first Annual Work Plan). Evaluate progress and prepare an Annual Work Plan thereafter with an initial time horizon of about 3 years to accomplish the Goals. (Identification of Deployment and Adoption Strategies and preparation of the Work Plan should be possible within 90-120 days.)

B. Develop a Budget to implement the Work Plan. Begin by first analyzing how many of the Deployment and Adoption Strategies can be integrated into existing activities of the Local Government with no or modest marginal costs. Then identify a range of costs and funding options for the balance of Strategies and Activities. Available public funding includes grants for and from: CPUC Local Agency Technical Assistance (LATA); CPUC CASF FFA, Infrastructure, Adoption, and PHA Accounts; Infrastructure Investment and Jobs Act (IIJA also referred to as the "Bipartisan Infrastructure Law" or BIL) administered by the U.S. Department of Commerce National Information and Technology Administration (NTIA). Much of IIJA funding will be pursuant to the State Digital Equity Plan being developed by CDT and the Broadband Equity, Access, and Deployment (BEAD) Plan being prepared by the CPUC. Local Governments should participate in these planning processes to provide input on both content and funding needs. Then, pursue IIJA funding for Deployment and Adoption Strategies when available either from State and/or NTIA. Local Governments also may want to seek funding from ISPs and philanthropic foundations.

VIII. Oversight and Technical Expertise

A. Designate a Local Government Leadership Team composed of appropriate administrators and those who become the Assigned Responsible Personnel in the Work Plan to lead actions and deliver results—to "own" the work products and ensure timely progress. It is most efficient and effective for Local Government "ownership of results" to begin with an internal Leadership Team rather than engage outside consultants.

B. Establish an outreach and engagement process to consult key stakeholders and obtain community input for the "Summary of Needs and Challenges" (Outline Item III) and to gather suggestions for Deployment and Adoption Strategies (Outline Items V and VI). Ensure a sufficient number of community forums are convened to capture the diversity of the population in the Local Government jurisdiction (usually >3 forums). It is most effective to complete Items I and II as background documents for the community forums. It may be more productive to meet with some key stakeholders, such as ISPs, in separate meetings to obtain candid, confidential, and detailed input. Consider conducting a community "feedback process" (which can involve a combination of distribution of documents, more community forums, and workshops with the Board or Council) after draft Deployment and Adoption Strategies are prepared.

C. Consider appointing a Community Advisory Committee to oversee development of the Strategic Action Plan (perhaps recruited in part from participants in community forums) and/or Technical Advisory Group to assist with review of ISP Last-Mile Project Proposals and help guide negotiations with ISPs.

IX. Evaluation Framework

A. Framework for reporting progress in implementing the Work Plan.

B. Metrics for achieving qualitative and quantitative Goals for <u>Ubiquitous Deployment</u>, such as number of Unserved and Underserved HHs, anchor institutions, and other locations are to be reached in Last-Mile Projects and are reached in completed Projects.

C. Metrics for achieving qualitative and quantitative Goals for Universal Adoption, such as the number of Unconnected and Underconnected HHs who are connected sustainably to high-speed home Internet service and become digitally-proficient through digital literacy training using the Self-Assessment tool for standardized benchmarking (the number of "full" Adoptions achieved).
D. Increases in ACP Enrollment by Zip Codes and County (using CDT ACP Enrollment Tracker).
E. Local Government Check List for Digital Equity.

X. Reporting Schedule for Accountability

A. Establish an internal monthly process for the Leadership Team to monitor progress in implementing the Work Plan and prepare a simple status report to County Administrator or City Manager.
B. Provide quarterly Update Reports and to the Local Government Board or Council.
    1. Progress on implementation of Deployment Strategies.
    2. Progress on implementation of Adoption Strategies.
C. Prepare an annual Progress Report to the Local Government Board or Council with an opportunity for public comment and feedback. The annual Progress Report should include at least the following content:
    1. Summary of quarterly Update Reports.
    2. Assessment of metrics towards achieving the qualitative and quantitative Goals for Deployment and Adoption (Item IV above).
    3. Status of completion and overall score on the Check List for Digital Equity.

XI. Glossary: Definitions

A. Technology definitions and common terms used in literature.
    1. Broadband: Generic term for high-speed Internet infrastructure, including both wireline and wireless networks.
    2. Unserved and Underserved; Unconnected and Underconnected.
    3. Adoption: Process of addressing 3 barriers for low-income households, including the concept of a "full" Adoption involving digital literacy training to achieve standardized digital proficiency.
B. Official terminology used by the Local Government, including organizational structure.

XII. Attachments

A. Maps of Broadband Deployment and Adoption for Local Government
B. Data Analysis for Adoption and Status of ACP Enrollment
C. Information About Affordable Connectivity Program (ACP) and Other Affordable Offers
D. Digital Literacy Framework and Self-Assessment
E. Local Government Check List for Digital Equity (Current Status and Score)
F. Other Local Government Relevant Policies and Ordinances
G. Links to Other Available Resources
    - California Department of Technology Website Broadband For All Website
    - Resource Guide: *Getting Connected – A Broadband Deployment and Adoption Resource Guide for Local and Regional Leaders* (posted on the CDT Broadband For All website; published 2021 by Connected Capital Area Broadband Consortium and CETF)
    - Local Government Check List for Digital Equity

Additional Information to Support Preparation of a Strategic Action Plan

Map of Needs and Opportunities

The purpose of a Map of Needs and Opportunities is to provide a common visual document of all the broadband (high-speed Internet infrastructure) needs in the Local Government jurisdiction, including Unserved and Underserved households, anchor institutions, and other locations. It also becomes a base document for developing and seeking public funding for Last-Mile Projects, including informing an open, competitive, and transparent public process to invite collaboration from private and public Internet Service Providers (ISPs) and other stakeholders in achieving Ubiquitous Deployment.

A comprehensive Map of Needs and Opportunities should include the following information or be a series of "overlays" to the CPUC Broadband Map for the Local Government jurisdiction:

- CPUC Broadband Maps (25/3 Mbps and 100/20 Mbps)
- Unserved Rural Communities (including Tribal Lands)
- High-Poverty Census Tracts (by percentage of poverty in 20 percentage-point bands)
- Communities Reported by School Districts as Unreliable Internet Infrastructure and Access
- Communities Reported by Health Providers as Unreliable Internet Infrastructure and Access
- Planned Surface Transportation and Transit Projects
- Broadband Strategic Corridors (submitted by Regional Consortia and mapped by Caltrans)
- Caltrans Existing and Needed Fiber Network for Traffic Management and Controls
- CENIC Networks
- All Publicly-Subsidized Multi-Unit Housing Complexes (Housing Authorities and Non-Profits)
- All Anchor Institutions
- OES Infrastructure (Fairgrounds, Emergency Response Staging Areas, PSAPs, FirstNet Nodes)
- Sensitive Habitats (as identified by CDFW, Regional Agencies)
- Cultural Assets (from Consultations with Tribal Leaders and Other Experts)
- Public Assets for Collaboration and/or Joint Use (including Water Districts' ROWs)
- IOUs and Other Public Utilities Fiber Networks (and ROWs)

Local Governments can obtain cost-effective and timely professional assistance for mapping from California State University, Chico:

North State Planning and Development Collective
35 Main Street, Suite 132
California State University, Chico
Jason Schwenkler, Executive Director
Email: jschwenkler@csuchico.edu
Telephone: (530) 898-4372 (Office); (530) 680-3653 (Mobile)

2021 Statewide Survey on Broadband Adoption
Sponsored by CETF and Conducted by University of Southern California

- The percentages below from the 2021 Statewide Survey on Broadband Adoption can be applied to the population of the Local Government jurisdiction for reasonable estimate of the number of Connected and Underconnected households (HHs).
- The 2023 Statewide Survey results will be available by April 2023.
- Use the California Department of Technology (CDT) ACP Enrollment Tracker to obtain the most recently-available data from the Federal Communications Commission (FCC) on the number and percentage by County and Zip Code of ACP-Eligible HHs and ACP-Enrolled HHs.

Socio-Economic Demographic Group	**Total Percent Connected**	**Percent Underconnected** (Smartphone Only)	**Percent To Be Connected** (Adoption Target)
All California	91%	6%	9%
Socio-Economic Demographic Group			
Low-Income	84%	8%	18%
African-American	92%	1%	8%
Asian	92%	3%	8%
LatinX	84%	8%	16%
Spanish-Speaking	75%	10%	25%
65 and Older	77%	5%	23%
High School Diploma	92%	7%	8%
No HS Diploma	63%	12%	37%
Region			
Los Angeles	89%	8%	11%
Inland Empire	92%	5%	8%
San Diego-Orange	89%	3%	11%
Central Valley	86%	6%	14%
Bay Area	96%	4%	4%
Rest of California	91%	8%	9%

Overview of a Local Government Programmatic Environmental Impact Report

Purpose

The purpose of a Programmatic Environmental Impact Report (EIR) is to provide an overall jurisdiction-wide analysis of the impacts and assessment of the net environmental benefits of a major infrastructure system, such as high-speed Internet infrastructure, which is referred to generically as "broadband" and includes both wireline and wireless networks. It provides a context for the assessment of impacts of any specific project and sets forth accepted data, consistent set of requirements, standardized methodology, and reliable recommendations for mitigations. It avoids repeated duplications of effort by applicants, thereby reducing costs and decreasing processing time. The certification of a Programmatic EIR by a Local Government provides a "rebuttable presumption" legally should litigation arise regarding a specific project that the jurisdiction has exercised due diligence in considering environmental impacts, net benefits, and reliability on the sufficiency of approved mitigations.

Analyses of Overall Impacts and Public Benefit

A Local Government Programmatic EIR should include at least the following scope of analyses of overall impacts and public benefits:

- Identify the households and other locations in the Local Government jurisdiction (including incorporated Cities if being done by County), which are Unserved and Underserved and need to be connected to high-speed Internet infrastructure consistent with State and federal speed thresholds and County performance standards to achieve the goals
- Develop a reliable projection of vehicle trips and vehicle miles traveled (VMT) avoided if all unserved and underserved locations in the Local Government jurisdiction are connected to high-speed Internet infrastructure with projected associated reductions in criteria pollutants and greenhouse gas emissions (GHG). The projection should be based on a comprehensive and representative review of literature and research on the relationship between broadband connectivity and VMT and GHG (such as the Summary of Research compiled for the Caltrans Grant to the Southern California Association of Governments). Projections of avoided trips should begin with a reliable inventory and analysis of all trip generation with a defensible projection of trip reduction by segment of the inventory based on reliable existing survey data, such as the USC-CETF 2021 Statewide Survey on Broadband Adoption and research published by the University of California, Davis Institute of Transportation Studies.
- Delineate and quantify all other potential impacts and prospective public benefits to be derived from ubiquitous broadband deployment with an analysis of net impacts vs. benefits, including public safety considerations and quality of life.
- Inventory and map all known (previously identified and characterized) sensitive environmental and cultural assets in the Local Government jurisdiction to be protected and preserved in the construction of broadband infrastructure with a reliable description of procedures for notifying the Local Government and other responsible public agencies along with approved acceptable standardized mitigation measures.
- Assess the potential to attract capital investment into the Local Government jurisdiction and increase economic productivity (such as job generation, increased wages, decreased costs of operations) with the availability of ubiquitous high-speed Internet infrastructure at all households and other locations.

Project-Specific Assessments

A Programmatic EIR should set forth project-specific assessments to be conducted for each broadband construction application and the process for submitting the assessment results in conjunction with an application. It also should prescribe the procedures to request and obtain a CEQA Negative Declaration or Exemption based on the project-specific assessments. Examples of project-specific assessments include:

- Description of the number of households and other locations to be connected by the broadband infrastructure deployment project with the calculations of the net impacts and benefits based on the Programmatic EIR.
- Identification of sensitive environmental and cultural assets along the path of deployment for the proposed infrastructure construction.
- Interruption and/or closure of public facilities and service during the construction period.

It is envisioned that a Programmatic EIR can be completed efficiently without excessive costs or time delays by conducting certain tasks in conjunction with or in parallel to existing or planned work for either a General Plan date or an EIR on a specific broadband project. Local Governments may be able to and leverage in-kind contributed resources from collaborating partners, such as the Regional Broadband Consortium and the Metropolitan Planning Organization and/or Council of Governments.

Definition and Description of Broadband Adoption

In closing the Digital Divide (the Challenge), strategies must promote Digital Inclusion (the Process) in all programs that serve digitally-disadvantaged residents to achieve Digital Equity (the Result). While Ubiquitous Deployment of high-speed Internet infrastructure is necessary, it is not sufficient to close the Digital Divide. Achieving Digital Equity requires Universal Adoption to ensure that all digitally-disadvantaged residents are able to use the Internet and computing devices with sufficient proficiency to help improve their lives. "Adoption" refers to the process of getting a household sustainably connected to the Internet at home and proficient in digital literacy skills.

The California Emerging Technology Fund (CETF) has established in regulatory proceedings before both the CPUC and FCC that an Adoption must address the 3 barriers for low-income households (Dr. John Horrigan 2013 research):

1. Cost (including the cost for both Internet service and an appropriate computing device).
2. Relevance (the reason why outreach in-language and in-culture by "trusted messengers"—the original "Digital Navigators"—is essential to explain to low-income unconnected HHs how they will benefit from being connected at home to the Internet).
3. Digital Literacy (no one will subscribe to service and acquire a device if they don't know how to use it to navigate the Internet).

A successful Adoption usually involves the following steps in assisting residents in unconnected households to: (a) understand the benefits of being connected online at home; (b) become aware of available affordable Internet service options; (c) acquire an affordable device for connecting to the Internet; (d) learn the foundational skills of digital literacy; and (e) select and sign up for home Internet service. It should be understood that community-based organizations (CBOs) who are the "trusted messengers" doing the outreach, assisting households sign up for home Internet service, and delivering the digital literacy training are what has become termed "Digital Navigator"—and CETF CBO grantees have been doing the work of Digital Navigators for more than a decade.

Thus, by definition, introductory digital literacy for base functionality is embedded in an Adoption. However, not all digital literacy training results in an Adoption unless it is an explicit outcome associated with funding for the program. Further, as many CETF grantee partners know from their deep and extensive experience in digital literacy training, more training often is needed and wanted by many Adopters to become sufficiently proficient to use the technology to optimize saving time and money.

CETF and grantee partners work on $250 per Adoption with digital literacy training consistent with the first 2 Elements of the Digital Literacy Framework. The San José Digital Inclusion Partnership (SJDIP) now awards grants at $350 per Adoption which includes delivering digital literacy training for the first 3 Elements of the UNESCO Framework with documentation of proficiency using the standardized Self-Assessment Tool.