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March 13, 2020

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Association of Central  
California

Mr. Chad Rupe, Administrator  
USDA Rural Development  
Rural Utilities Service  
STOP 1510, Rm 5135  
1400 Independence Ave., SW  
Washington, DC 20250-1510

RE: Identifying Regulatory Reform Initiatives  
(Docket ID: USDA-2017-0002-0001)

Dear Administrator Rupe:

Thank you for the opportunity to provide public comment on the ReConnect Program associated with the release of the recent Funding Opportunity Announcement (FOA) published on December 12, 2019. Expanding broadband service to rural communities and farms that do not have sufficient access to broadband is essential. As the largest agricultural state in the nation, California has more than 1.2 million individuals without fixed broadband service meeting the benchmark (Federal Communications Commission Report: FCC 12-90), with the third largest rural population in the nation without sufficient service – representing approximately 35.2% of the state's rural population.

On behalf of the California State Board of Food and Agriculture, an advisory body to the Governor and Secretary of Agriculture, below please find a recommendation to improve the current round and future rounds of ReConnect funding, as well as any future USDA broadband programs.

#### Essential Community Facilities

Essential Community Facilities are defined in the FOA as, "public facilities that provide community services essential for supporting the safety, health, and well-being of residents, including, but not limited to, emergency response and other public safety activities." The FOA further indicates that Essential Community Facilities will be counted using the Geographic Information System (GIS) layer located in the Rural Utilities Service (RUS) mapping tool. Defined Essential Community Facilities include: local law



March 13, 2020

Page 2

enforcement offices, fire stations, prisons, and state emergency operation centers. Also included on this list are city/town halls and post offices.

*Recommendation:* For the current and future rounds of broadband funding, we strongly recommend that state and county fairgrounds be included within the definition of Essential Community Facilities. In California, fairgrounds continue to be essential in supporting the safety, health and well-being of residents – serving as evacuation centers and shelters during fires and floods. Of California's 77 fairgrounds, 36 (47% of all fairs in the state) have been activated as evacuation centers, fire camps, and animal shelters providing direct emergency response and public safety activities. Sufficient access to broadband connectivity at these locations is critical to provide individuals and families impacted by emergencies essential access to communication, banking and other services. Allowing state and county fairground eligibility as Essential Community Facilities is a priority for our state to extend overall broadband connectivity and better prepares for future emergencies.

We appreciate the opportunity to provide public comment on this topic and are hopeful that you will incorporate this recommend change in the ReConnect Program and other broadband programs as applicable.

Sincerely,

  
Don J. Cameron

cc: Secretary Karen Ross, California Department of Food and Agriculture

Enclosures

## California Fairground Locations

FairName	Address	City	State	PostalCode	County	Lat	Long
1-A DAA - Grand National Rodeo	2600 Geneva Ave.	Daly City	CA	94014	San Francisco	37.707129	-122.417851
2nd DAA - San Joaquin County Fair	1658 S. Airport Way	Stockton	CA	95206	San Joaquin	37.937984	-121.268735
3rd DAA - Silver Dollar Fair	2357 Fair Street	Chico	CA	95928	Butte	39.716261	-121.813535
4th DAA - Sonoma-Marin Fair	175 Fairgrounds Drive	Petaluma	CA	94952	Sonoma	38.241769	-122.630236
7th DAA - Monterey County Fair	2004 Fairground Road	Monterey	CA	93940	Monterey	36.594187	-121.865975
9th DAA - Redwood Acres Fair	3750 Harris St.	Eureka	CA	95503	Humboldt	40.780318	-124.126308
10th DAA - Siskiyou Golden Fair	1712 Fairlane Road	Yreka	CA	96097	Siskiyou	41.707009	-122.640132
10-A DAA - Tulelake-Butte Valley Fair	800 S. Main Street	Tulelake	CA	96134	Siskiyou	41.950297	-121.478613
12th DAA - Redwood Empire Fair	1055 N. State Street	Ukiah	CA	95482	Mendocino	39.162809	-123.207937
13th DAA - Yuba-Sutter Fair	442 Franklin Ave.	Yuba City	CA	95991	Sutter	39.130518	-121.610581
14th DAA - Santa Cruz County Fair	2601 E. Lake Ave.	Watsonville	CA	95076	Santa Cruz	36.950828	-121.735949
15th DAA - Kern County Fair	1142 South "P" St.	Bakersfield	CA	93307	Kern	35.342344	-119.011576
16th DAA - California Mid-State Fair	2198 Riverside Ave	Paso Robles	CA	93446	San Luis Obispo	35.638206	-120.687564
17th DAA - Nevada County Fair	11228 McCourtney Road	Grass Valley	CA	95949	Nevada	39.206389	-121.077078
18th DAA - Eastern Sierra Tri-County Fair	Sierra St & Fair Drive	Bishop	CA	93514	Inyo	37.372818	-118.399450
19th DAA - Santa Barbara Fair and Exposition	3400 Calle Real	Santa Barbara	CA	93105	Santa Barbara	34.430504	-119.734543
20th DAA - Gold Country Fair	1273 High Street	Auburn	CA	95603	Placer	38.893004	-121.072937
21st DAA - Big Fresno Fair	1121 South Chance Avenue	Fresno	CA	93702	Fresno	36.731123	-119.750980
21-A DAA - Madera District Fair	1850 W. Cleveland Ave	Madera	CA	93637	Madera	36.972916	-120.080440
22nd DAA - San Diego County Fair	2260 Jimmy Durante Blvd.	Del Mar	CA	92014	San Diego	32.972580	-117.261042
23rd DAA - Contra Costa County Fair	1201 West 10th Street	Antioch	CA	94509	Contra Costa	38.009802	-121.822783
24th DAA - Tulare County Fair	215 Martin Luther King Jr. Ave.	Tulare	CA	93274	Tulare	36.201474	-119.344313
24-A DAA - Kings Fair	810 S. 10th Ave	Hanford	CA	93230	Kings	36.315040	-119.636596
25th DAA - Napa Town and Country Fair	575 Third Street	Napa	CA	94559	Napa	38.298612	-122.278889
26th DAA - Amador County Fair	18621 Sherwood Street	Plymouth	CA	95669	Amador	38.479110	-120.853051
27th DAA - Shasta District Fair	1890 Briggs Street	Anderson	CA	96007	Shasta	40.454034	-122.308965
28th DAA - San Bernardino County Fair	14800 Seventh Street	Victorville	CA	92392	San Bernardino	34.520511	-117.312086
29th DAA - Mother Lode Fair	220 Southgate Drive	Sonora	CA	95370	Tuolumne	37.979109	-120.388931
30th DAA - Tehama District Fair	650 Antelope Blvd	Red Bluff	CA	96080	Tehama	40.187935	-122.202720
31st DAA - Ventura County Fair	10 W. Harbor Blvd.	Ventura	CA	93001	Ventura	34.276567	-119.300616
32nd DAA - Orange County Fair	88 Fair Drive	Costa Mesa	CA	92626	Orange	33.668612	-117.904853
33rd DAA - San Benito County Fair	9000 Airline HWY.	Tres Pinos	CA	95075	San Benito	36.766680	-121.301845
34th DAA - Modoc District Fair	1 Center Street	Cedarville	CA	96104	Modoc	41.523874	-120.174814
35th DAA - Merced County Fair	900 Martin Luther King Jr. Way	Merced	CA	95340	Merced	37.291659	-120.484812
35-A DAA - Mariposa County Fair & Homecoming	5007 Fairgrounds Road	Mariposa	CA	95338	Mariposa	37.463996	-119.946538
36th DAA - Dixon May Fair	655 South First Street	Dixon	CA	95620	Solano	38.439474	-121.822135
37th DAA - Santa Maria Fair Park	937 S. Thornburg St.	Santa Maria	CA	93458	Santa Barbara	34.941523	-120.440693
38th DAA - Stanislaus County Fair	900 North Broadway	Turlock	CA	95380	Stanislaus	37.500761	-120.856705
39th DAA - Calaveras Co. Fair & Jumping Frog Jubilee	101 Frogtown Road	Angels Camp	CA	95222	Calaveras	38.048767	-120.522602
40th DAA - Yolo County Fair	1125 East Street	Woodland	CA	95776	Yolo	38.666423	-121.765321
41st DAA - Del Norte County Fair	421 Highway 101 North	Crescent City	CA	95531	Del Norte	41.760435	-124.196754
42nd DAA - Glenn County Fair	221 East Yolo Street	Orland	CA	95963	Glenn	39.742746	-122.181502
44th DAA - Colusa County Fair	1303 10th Street	Colusa	CA	95932	Colusa	39.204996	-122.019450
45th DAA - California Mid-Winter Fair & Fiesta	200 East Second Street	Imperial	CA	92251	Imperial	32.836715	-115.569262
46th DAA - Southern California Fair	18700 Lake Perris Dr.	Perris	CA	92571	Riverside	33.848403	-117.202512
48th DAA - Schools' Agriculture & Nutrition Program	1100 N. Grand, Bldg.F10 Farm Rd.	Walnut	CA	91789	Los Angeles	34.048884	-117.838333
49th DAA - Lake County Fair	401 Martin St.	Lakeport	CA	95453	Lake	39.040083	-122.918238
50th DAA - Antelope Valley Fair	2551 W. Avenue H	Lancaster	CA	93536	Los Angeles	34.722624	-118.175036

### California Fairground Locations

FairName	Address	City	State	PostalCode	County	Lat	Long
51st DAA - The Valley Fair	2551 W. Avenue H	Lancaster	CA	93536	Los Angeles	34.722624	-118.175036
52nd DAA - Sacramento County Fair	1600 Exposition Blvd	Sacramento	CA	95815	Sacramento	38.592609	-121.431328
53rd DAA - Desert Empire Fair	520 South Richmond Rd	Ridgecrest	CA	93555	San Bernardino	35.612132	-117.646186
54th DAA - Colorado River Fair	11995 Olive Lake Blvd.	Blythe	CA	92225	Riverside	33.620167	-114.557204
Alameda County Fair	4501 Pleasanton Avenue	Pleasanton	CA	94566	Alameda	37.659773	-121.882103
Butte County Fair	199 East Hazel St	Gridley	CA	95948	Butte	39.365930	-121.683447
Cloverdale Citrus Fair	1 Citrus Fair Drive	Cloverdale	CA	95425	Sonoma	38.802348	-123.017456
El Dorado County Fair	100 Placerville Drive	Placerville	CA	95667	El Dorado	38.723809	-120.833536
Humboldt County Fair	1250 5th Street	Ferndale	CA	95536	Humboldt	40.586772	-124.264809
Los Angeles County Fair	1101 W. McKinley Ave	Pomona	CA	91768	Los Angeles	34.081418	-117.765818
Lassen County Fair	195 Russell Avenue	Susanville	CA	96130	Lassen	40.413063	-120.635971
Madera County Fair	1000 S. Third Street	Chowchilla	CA	93610	Madera	37.115131	-120.253470
Marin County Fair	10 Avenue of the Flags	San Rafael	CA	94903	Marin	38.003815	-122.531434
Mendocino County Fair	14400 Highway 128	Boonville	CA	95415	Mendocino	39.007262	-123.365755
Merced County Fair	403 F Street	Los Banos	CA	93635	Merced	37.065295	-120.848481
Salinas Valley Fair	625 Division Street	King City	CA	93930	Monterey	36.205384	-121.127382
Napa County Fair	1435 Oak Street	Calistoga	CA	94515	Napa	38.585909	-122.585242
National Orange Show	689 South "E" Street	San Bernardino	CA	92408	San Bernardino	34.088421	-117.293249
Placer County Fair	800 All American Blvd.	Roseville	CA	95678	Placer	38.756115	-121.292601
Plumas-Sierra County Fair	204 Fairgrounds Road	Quincy	CA	95971	Plumas	39.938249	-120.914724
Riverside County Fair	82-503 Highway 111	Indio	CA	92201	Riverside	33.714581	-116.224861
Santa Clara County Fair	344 Tully Road	San Jose	CA	95111	Santa Clara	37.303695	-121.853267
Shasta County Fair	44218 A Street	McArthur	CA	96056	Shasta	41.051519	-121.400747
Lodi Grape Festival & Harvest Fair	413 E. Lockeford St	Lodi	CA	95240	San Joaquin	38.138522	-121.263528
San Mateo County Fair	2495 S. Delaware St.	San Mateo	CA	94403	San Mateo	37.546303	-122.303718
Solano County Fair	900 Fairgrounds Drive	Vallejo	CA	94589	Solano	38.140511	-122.226307
Sonoma County Fair	1350 Bennett Valley Rd.	Santa Rosa	CA	95404	Sonoma	38.432922	-122.700821
Trinity County Fair	S. Highway 3	Hayfork	CA	96041	Trinity	40.544248	-123.190173
California Exposition and State Fair	1600 Exposition Blvd	Sacramento	CA	95815	Sacramento	38.592611	-121.431330