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December 7, 2020

Ms. Connie Chen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Zayo Group, LLC's Prineville to Reno Fiber Optic Line Project (Application A.20-10-008) – Response #1 to CPUC Application Completeness Review/Data Request

Dear Ms. Chen:

We write to provide additional information in response to the CPUC's completeness review letter from October 30, 2020 of Zayo Group, LLC's (Zayo's) Application for modification of a Certificate of Public Convenience and Necessity (CPCN) and Proponent's Environmental Assessment (PEA), filed on October 1, 2020 (Application A.20-10-008).

As you are aware, Zayo provided updated project GIS data to CPUC on November 11, 2020. On November 13, 2020, Zayo provided a matrix of initial responses to comments as well as detailing how Zayo would address each unanswered comment in the future, e.g., revise as suggested, undertake additional analyses, or recommend inclusion in the CPUC's CEQA document. In the absence of a formal response from CPUC, we assume our approach to each, described in the November 13th matrix and discussed in detail with CPUC over several phone conversations, is adequate.

The November 13th matrix included placeholders for responses to several comments. Following that submittal, you and I on November 20th discussed the Zayo proposed method for addressing each of these issues. You express preliminary agreement with the following approaches:

- Noise: refine the analysis provided by utilizing data compiled by the American National Standards Institute (ANSI), which provides calculations for noise levels based on land uses and population density;
- Aerially deposited lead: as recommended in discussions with Caltrans (Attachment B), identify this as a potential issue in the environmental document and then mitigate it through the implementation of a Lead Compliance Plan; and
- Wildfire: discuss the risk of wildfire from aboveground project components and how that risk can be mitigated.

On November 30th, you provided a request for further refinement of the proposed wildfire risk assessment, specifically that it include a discussion of the wildlife risks surrounding the above-

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ground elements and additional information about the equipment at the ILA and the new electric line leading to the ILA, including an assessment of associated fire risk. You confirmed that with these changes Zayo's proposed approach was acceptable.

With this letter, we are submitting an updated comment matrix (Attachment A), the requested personnel communication with Caltrans related to the aerially deposited lead analysis that we discussed on November 20th (Attachment B), the revised Biological Resource Section (Attachment C), Revised PEA Figures (Attachment D), Paleontological Resources Report GIS (Attachment E), Revised PEA Noise (Attachment F), USACE Aquatic Resources Spreadsheets (Attachment G), BRTR Revised Figure 3 (Attachment H), and Paleontological Resources Report Revised Table 3 (Attachment I).

In the interest of expediency, responses to comments will continue to be submitted in batches as information is finalized. It is our understanding that the CPUC will deem the application complete once we submit a revised Project Description and the revised wildfire risk assessment.

We trust the information provided herein is fully responsive to your requests. However, should you have any further questions, please do not hesitate to contact me at 415.846.3663 or ella.gannon@morganlewis.com.

Sincerely,



Attachments:

- Attachment A: November 13, 2020 Initial Comment Response Matrix
- Attachment B: Personal communication with Caltrans regarding aerially deposited lead
- Attachment C: Revised PEA Biological Resources Section
- Attachment D: Revised PEA Figures
- Attachment E: Paleontological Resources Report GIS
- Attachment F: Revised PEA Noise Section
- Attachment G: USACE Aquatic Resources Spreadsheets
- Attachment H: BRTR Revised Figure 3
- Attachment I: Paleontological Resources Report Revised Table 3

Please note that the Cultural Report and Ethnographic Report were provided to CPUC on November 20, 2020 and are not enclosed for confidentiality purposes.

Comments Addressed - November 11, 2020

Number (per 11/13/20 matrix)	Resource	Section	Comment	Response
13	Section 3 Project Description	3.3.1 Preliminary Design and Engineering	The information required on page 15 of the PEA Guidelines is not contained in this section, the referenced sections, or Appendix A. For example, approximate locations, dimensions, and limits of areas needed for construction are not described or (with the exception of approximate locations of ILAs and staging areas) shown on maps.	These data were provided in the GIS package on 11/11/20
14	Section 3 Project Description	3.3.5 In Line Amplifiers	Provide site maps of the ILA locations either in this section or Appendix A	These data were provided in the GIS package on 11/11/20
20	Section 3 Project Description	3.5.2.1 Staging Area Locations	Staging Area locations have been identified according to the text. Detailed information on the size and condition of each staging area should be included here or in an appendix, including site maps.	These data were provided in the GIS package on 11/11/20
21	Section 3 Project Description	3.5.2.3 Material Storage Yards	Last sentence in section says Material Storage Yards have been identified, but no location or other information is provided in the PEA or in an appendix. Section references Figure 3-2, but this figure does not show Material Storage Yards. Although some of the communities identified for Material Storage Yard locations are shown on the maps, not all are.	These data were provided in the GIS package on 11/11/20
24	Section 3 Project Description	3.5.3.2 Work Area Disturbance	This required section from the PEA Guidance is not numbered. The information is partially in Section 3.5.3.1. In general, the description of the construction work areas is very brief.	These data were provided in the GIS package on 11/11/20

Number (per 11/13/20 matrix)	Resource	Section	Comment	Response
59	Section 4 Alternatives	4.1 Alternatives Considered	The applicant states here that all of the ILAs, staging areas, and material storage yards are in the roadway ROW or on previously disturbed lands. There is no evidence in this section, in the project description, or appendices as precise locations and site maps for these facilities are not provided.	These data were provided in the GIS package on 11/11/20
62	5.1 Aesthetics	5.1.2, 5.1.3, 5.1.4	Need to identify viewpoints that correspond to the representative photographs provided in Section 5.1.1.2. Provide the following information for each viewpoint: Number, title, and brief description of the location; Types of viewers; Viewing direction(s) and distance(s) to the nearest proposed project features; Description of the existing visual conditions and visibility of the project site as seen from the viewpoint and shown in the representative photographs. Provide a supporting map (or maps) showing project features and representative viewpoints with arrows indicating the viewing direction(s). Provide associated GIS data (may be combined with GIS data request below for representative photographs).	These data were provided in the GIS package on 11/11/20
82	5.4 Biological Resources	Table 5.4.2	"Temporary Impacts" would be more accurately labeled as "Direct Impacts," since some impacts may become permanent if restoration is not possible. Also, the text should explain exactly what these acreages reflect (i.e., special status plant population acreages in the proposed footprint of disturbance? acreages in the BRSA?).	Temporary and permanent impact footprints were provided as part of GIS package on 11/11/20. Temporary impacts changed to direct, as suggested. Text clarified to note that impacts refer to special status plants within the ADI.

Number (per 11/13/20 matrix)	Resource	Section	Comment	Response
90	5.4 Biological Resources	Table 5.4-4	"Temporary Impacts" would be more accurately labeled as "Direct Impacts," since some impacts may become permanent if restoration is not possible. Also, the text should explain exactly what these acreages reflect (i.e., acreages in the proposed footprint of disturbance? acreages in the BRSA?).	These data were provided in the GIS package on 11/11/20. The text and table were updated to explain what the acreages reflect.
242	PEA Guidelines Mapbook and GIS Requirements	3.12.3 GIS Data	There is a 10-foot alignment buffer called the ADI, not clear if that is intended to encompass all impacts or work areas. Land ownership and postmiles missing from GIS	These data were provided in the GIS package on 11/11/20
252	Additional Sections with GIS Requirements	5.5.1.3 - Cultural Resource Survey Boundaries	missing GIS data	These data were provided in the GIS package on 11/11/20
268	BTR Minimum Requirements; Mapping and GIS Data	a) Biological survey area for each survey that was conducted	missing GIS	These data were provided in the GIS package on 11/11/20
269	BTR Minimum Requirements; Mapping and GIS Data	b) Vegetation communities and land cover types	Yes, GIS data provided	These data were provided in the GIS package on 11/11/20
270	BTR Minimum Requirements; Mapping and GIS Data	c) Aquatic resource delineation	Yes, GIS data provided	These data were provided in the GIS package on 11/11/20

Number (per 11/13/20 matrix)	Resource	Section	Comment	Response
271	BTR Minimum Requirements; Mapping and GIS Data	d) Special-status plant locations	Yes, GIS data provided	These data were provided in the GIS package on 11/11/20
272	BTR Minimum Requirements; Mapping and GIS Data	e) Special-status wildlife locations	only raptor nests	These data were provided in the GIS package on 11/11/20

Comments Addressed – December 7, 2020

Number	Resource	Section	Comment	Response
72	5.4 Biological Resources	5.4.1.2, Survey Area (Local Setting)	The total acreage of the survey area, length of survey area, and approximate range of widths of the survey area should be reported here, should match the area of potential effect reported in Section 3.3, Proposed Project Description, and should match the survey area reported in the BRTR, Delineation Report and Botanical Report. For example, the length of the study area in California is reported as 192 miles in the Delineation Report vs. approximately 200 miles in the Botanical Report vs. 193.9 miles in the main body of the BRTR and Section 5.4 of the PEA. In addition, the study area acreage is reported as 5,976 acres in the Delineation Report vs. 5,538 acres in the Botanical Report. The ROW widths are reported as 60 to 1,500 feet wide in Section 5.4 of the PEA vs. 20 to 250 feet in the Botanical Report. It currently appears that additional botanical surveys are required to survey the entire current study area, as well as potentially additional wetland delineations, or the discrepancy should be explained in all reports.	Survey areas for all biological resource surveys is the Caltrans right-of-way. Data provided as GIS on 11/11/2020
73	5.4 Biological Resources	5.4.1.3, Vegetation Communities and Land Cover	Should be <i>Artemisia tridentata</i> rather than <i>Artemisia tridentate</i> .	Please refer to Attachment C. Change made as suggested.
74	5.4 Biological Resources	5.4.1.5, Habitat Assessment	Please add the following to the list of special status species: BLM Sensitive Species and California Department of Forestry and Fire Protection (CDF) Sensitive Species. These corrections should be made to the BRTR as well.	Applicant has no objection to inclusion of these species in the CEQA document. No further information required.

Number	Resource	Section	Comment	Response
75	5.4 Biological Resources	5.4.1.5, Habitat Assessment	The second sentence should be clarified to say "They identified <u>the following special status species</u> : 127 plants, 19 mammals," In addition, the Executive Summary of the Botanical Report states that "38 special status plant species" were documented in the BRSA. Please note in the PEA that 38 special status plant species were observed in the BRSA.	Please refer to Attachment C. Applicant updated the text of Section 5.4.1.5 to clarify that these are special status species by taxa and listed the numbers of special status species observed in the project during field surveys.
76	5.4 Biological Resources	5.4.1.7, Native Wildlife Corridors and Nursery Sites	Please correct last sentence to state "...pronghorn antelope (<i>Antilocarpa americana</i>) kidding areas occur outside of the BRSA...". Please discuss the potential for greater sage-grouse leks to occur in the BRSA and/or proximity to the BRSA.	Please refer to Attachment C. The sentence has been edited to clarify that pronghorn kidding habitat is BLM-designated. Applicant is still coordinating with the BLM Eagle Lake Field Office about greater sage-grouse and will provide an update when relevant information is received. Applicant confirmed during surveys that no leks occur within the BRSA.
77	5.4 Biological Resources	5.4.1.8, Biological Resource Management Area	Please correct title to "Areas" rather than "Area." Please state explicitly which areas are directly crossed by the Project and which areas are only within 5 miles of the BRSA. Except for the 1st and last sentences, this paragraph should be in the impact analysis rather than the existing setting. An impact analysis on these biological management areas must be added to the Impact Analysis below.	Please refer to Attachment C. Applicant updated the title of Section 5.4.1.8 and text to include which biological resource management areas the Project directly crosses and placed the impacts analysis information in Section 5.4.4.b.
78	5.4 Biological Resources	5.4.1.4, Aquatic Features	The section states "Stantec identified 238.21 ac of potential waters of the U.S. and state within the BRSA." However, waters of the state, were not explicitly mapped or quantified. Appendix D, Delineation of Potential Waters of the U.S. Report, of the Biological Resources Technical Report, states that only potential waters of the U.S. were evaluated, quantified, and mapped. "Potential waters of the U.S." may overlap with potential waters of the State, however, there	All aquatic areas meeting the definition of either WOUS or Waters of the State have been delineated and the analysis reflects impacts to both. The information in this section will be updated to clarify WOUS and Waters of the State once we receive confirmation from the USACE; The wetland delineation methods were consistent with the USACE and RWQCB requirements for identifying both waters of the U.S. and State. Applicant is awaiting verification from the USACE to provide a

Number	Resource	Section	Comment	Response
			<p>could be a much greater acreage of waters of the State in the Biological Resources Study Area than the "potential waters of the U.S." Therefore, waters of the State must be mapped and quantified in the Biological Resources Study Area (BRSA) in order for the application to be deemed complete. Finally, under the 2020 Section 401 Water Quality Certification Rule (Sept. 11 2020) and new rule on jurisdictional waters of the U.S., it is our understanding that the USACE will not issue a Preliminary Jurisdictional Determination (PJD) where waters of the State may be involved, but will require issuance of an Approved Jurisdictional Determination (AJD) instead.</p>	<p>response to our aquatic resources delineation report. Based on the USACE response, it will confirm what features are waters of the state and which are waters of the U.S.</p>
81	5.4 Biological Resources	5.4.4.1, Special Status Plants	<p>It appears that the paragraph starting with "While the project would avoid impacts...", as well as Table 5.4-2 should be placed at the very beginning of the analysis.</p>	<p>Please refer to Attachment C. Change made as suggested.</p>
84	5.4 Biological Resources	5.4.4.1, Special Status Plants	<p>A discussion of impacts associated with herbicide use is included. The use of herbicides is not discussed as a proposed activity in Section 3.3 of the Proposed Project Description, including when, where, and why. These details should be discussed in Section 3.3 of the PEA as well as evaluated more fully in Section 5.4.4.1.</p>	<p>Herbicide use is included in Section 5.4 Biological Resources. The applicant will update the Hazards and Project Description Sections to reflect this use.</p>
85	5.4 Biological Resources	5.4.4.2, Special Status Wildlife	<p>Please see comments on APM BIO-16. This measure is in conflict with APM BIO-11, Nesting Birds. In addition, no tree removal or trimming is proposed in Section 3.5.4.3 of the PEA; please reconcile. Finally, APM BIO-16 does not address impacts associated with the potential for bats to roost on bridges in the BRSA and potential disturbance to these roosts by project activities (i.e., hanging lines on bridges). This</p>	<p>Please refer to Attachment C. Applicant updated the referenced APM measures, dividing into Nesting Birds (Bio-11) and Bats (Bio-16) measures. APM Bio-11 clarifies the difference between the two buffers for non-raptor nests, and APM Bio-16 notes that pre-construction surveys for bat roosts on bridges will be conducted. All reference to tree removal were deleted.</p>

Number	Resource	Section	Comment	Response
			paragraph should address potential impacts on bat roosts on bridges and consider proposing pre- construction surveys for roosting bats on bridges as well as establishment of buffers from disturbance during construction if found.	
86	5.4 Biological Resources	5.4.4.2, Special Status Wildlife	This paragraph should be clarified that measure APM BIO- 10 would require work during the daylight hours to the maximum extent possible (but that some night work is possible).	Please refer to Attachment C. Change made as suggested.
87	5.4 Biological Resources	5.4.4.2, Special Status Wildlife	The comments on herbicides in Section 5.4.4.1 also apply to this section.	Herbicide use is included in Section 5.4 Biological Resources. The applicant will update the Hazards and Project Description Sections to reflect this use.
91	5.4 Biological Resources	Impact Question c) Have a substantial adverse effect on state or federally protected wetlands...	(see Section 5.4.4.4 of the PEA Checklist). In order to accurately evaluate impacts on jurisdictional waters of the U.S. and waters of the State, they must both be mapped and quantified in the BRSA, and temporary and permanent impacts on each must be evaluated. Therefore, the following are required prior to deeming the application complete: (1) the acreages of waters of the State in the BRSA must be mapped and quantified; (2) the acreages of waters of the U.S. in the BRSA must be verified through issuance of an AJD; (3) the exact proposed locations of directional drilling must be determined as well as alternative routes to avoid or minimize impacts; (4) as required in the PEA checklist, a table shall be provided identifying all wetlands, by milepost and length, crossed by the project and the total acreage of each wetland type that would be affected by construction (in terms of temporary and permanent impacts); (5) it must be determined whether the Project would qualify for	See response to Comment 78; Applicant is also waiting for the USACE to provide a response to our PJD which will allow us to provide an accurate assessment of potential waters of the state and waters of the U.S.

Number	Resource	Section	Comment	Response
			<p>Nationwide Permit(s) (NWP[s]) or whether an Individual Permit would be required; (6) if an Individual Permit is required, preparation and submittal of a 404(b)(1) Least Environmentally Damaging Practicable Alternative analysis is required; and (7) if jurisdictional waters of the U.S. or waters of the State would be permanently filled, describe the proposed measures to compensate for permanent wetland losses (the project description and APMs are unclear whether restoration is</p>	
92	5.4 Biological Resources	Table 5.4-5	<p>This table is labeled "Potential Waters of the U.S. and State Project Impacts" however, the Delineation Report for the Project only mentions that waters of the U.S. were mapped and quantified. Please clarify.</p>	<p>See response to Comment 78; Applicant is also waiting for the USACE to provide a response to our PJD which will allow us to provide an accurate assessment of potential waters of the state and waters of the U.S.</p>
93	5.4 Biological Resources	Impact Question d) Interfere substantially with the movement of resident migratory...or use of native wildlife nursery sites...	<p>The impact analysis on greater sage-grouse leks should be included or referenced here.</p>	<p>Please refer to Attachment C. Reference to discussion of impacts on greater sage-grouse in section 5.4.4.2 was included under Impact Question d as suggested.</p>
94	5.4 Biological Resources	Impact Question e) Conflict with local policies...	<p>Potential impacts on biological resources discussed under impacts a) through d) would potentially result in conflicts with local policies protecting biological resources. However, implementation of APMs would reduce impacts to less than significant levels. Impacts should be "less than significant" rather than "no impact."</p>	<p>Please refer to Attachment C. Agreed. Updated to say "less than significant" and short explanation provided.</p>

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97	5.4 Biological Resources	5.4.5, Draft Environmental Measures	There should be a provision for all new workers to be trained, and documentation of each worker who has been trained through a sign-in sheet.	Please refer to Attachment C. Revision made.
98	5.4 Biological Resources	5.4.5, Draft Environmental Measures	In order for the measure to fully mitigate loss of native habitat, the following edits are recommended: (1) this measure should include provisions to revegetate and restore native habitat after any repair or maintenance of the line as well; (2) any soils from commercially available sources should be from local areas and weed-free; (3) local native seed mixes and native container plants specific to the habitat disturbed should be used for site revegetation and restoration; (4) this measure should include provisions for regular maintenance and monitoring of the revegetated areas to ensure success of restoration as well as performance measures to determine success; (5) this measure should include direction on the proper use of herbicides to control invasive species in the revegetated/restored areas; and (6) this measure should include provisions for review and approval of the RRP by the governing landowner.	Please refer to Attachment C. Added further clarification to this measure.
99	5.4 Biological Resources	5.4.5, Draft Environmental Measures	Because use of herbicides in work areas could adversely affect special status plant species and/or native plant communities, it is recommended to address use of herbicides under measure APM BIO-5, Site Restoration, rather than in this measure.	Please refer to Attachment C. Added further clarification to this measure.

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101	5.4 Biological Resources	5.4.5, Draft Environmental Measures	Please add the word "and" as follows: "If additional special status plants are identified during pre-construction surveys, and complete..."	Please refer to Attachment C. Revision made.
102	5.4 Biological Resources	5.4.5, Draft Environmental Measures	Would implementation of this measure increase the size of disturbance of the entry and exit pits for the directional drilling? If so, the potential for this to occur should be discussed in the Section 3.3, Proposed Project Description.	Will clarify in revised Project Description
103	5.4 Biological Resources	5.4.5, Draft Environmental Measures	This measure should also include a requirement to implement a Dewatering Plan in place of bullet no. 2. The Dewatering Plan should be prepared and submitted as part of the PEA submittal prior to deeming the application complete. The Dewatering Plan should include provisions for screening intake pipes/hoses for any pumps, excluding fish and aquatic herptiles from dewatering equipment, relocating any fish from areas proposed for dewatering, and measures to control and monitor water quality during dewatering activities.	Please refer to Attachment C. Added further clarification to this measure.
104	5.4 Biological Resources	5.4.5, Draft Environmental Measures	This measure is in conflict with APM BIO-11, Nesting Birds. In addition, Section 3.5.4.3 of the PEA states that no tree removal or trimming is proposed. Instead this measure should stipulate pre-construction surveys for bats in trees as well as under bridges in the BRSA and include requirements and performance measures to avoid or minimize impacts on bat species. As written, the measure does not fully mitigate impacts on special status bat populations.	Please refer to Attachment C. Applicant updated the referenced APM measures, dividing into Nesting Birds (Bio-11) and Bats (Bio-16) measures. APM Bio-11 clarifies the difference between the two buffers for non-raptor nests, and APM Bio-16 notes that pre-construction surveys for bat roosts on bridges will be conducted. All reference to tree removal were deleted.
105	5.5 Cultural Resources	5.5.1.2	We understand from the PEA and the applicant that the cultural resources technical studies are not yet complete and, therefore, were not	The cultural report and ethnography report to ECorp and CPUC on 11/20/2020.

Number	Resource	Section	Comment	Response
			included with the PEA. Complete copies of all cultural resources technical studies and confidential attachments (including maps and GIS data) are required before additional comments on the PEA can be provided and the PEA can be determined to be complete.	
112	5.7 Geology, Soils, and Paleontological Resources	5.7.1.2	The figure correctly includes a 10-mile buffer from the proposed alignment and includes active faults. Please include the five (5) named faults on page 5.7.2 on the figure. Also provide the GIS data.	Please refer to Attachment D.
141	5.13 Noise	5.13.1.2	The last sentence of this paragraph is confusing. "Based on the rural character of the area, it can be assumed that the outdoor ambient noise levels would be consistent with the California General Plan Guidelines and would range from approximately 50 dBA to 60 dBA." The paragraph is describing the existing noise environment so the use of the phrase, "would be consistent..." seems out of place.	Please refer to Attachment F. Deleted sentences. As coordinated with CPUC and ECorp, the section was revised to include new source data for existing ambient conditions as further outlined in response to comment 146.
142	5.13 Noise	5.13.1.2	The Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and PEAs requires the identification of existing noise levels at the noise sensitive areas near the Project. Existing noise levels are not provided.	Please refer to Attachment F. As coordinated with CPUC and ECorp, section was revised to include the American National Standards Institute (ANSI) Standard 12.9-2013/Part 3 "Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-Term Measurements with an Observer Present" ambient noise table for the basis of ambient noise levels along the project area as further outlined in response to comment 146.
143	5.13 Noise	5.13.2.3	Page 5.13.4 of the section notes that residential land uses in the City of Alturas would be located within 25 feet of the project. However, City of Alturas noise standards are not	Please refer to Attachment F. The section was revised to include new source data for existing ambient conditions as further outlined in response to comment 146. In addition, the existing conditions

Number	Resource	Section	Comment	Response
			discussed. ECORP recommends that the analysis identify City of Alturas noise standards since land uses in the City will be affected by the project.	discussion was expanded to include additional language regarding sensitive receptors/land use types across the project area. Added City of Alturas noise standards in the regulatory and impact analysis for informational purposes. CPUC has sole and exclusive jurisdiction and does not need to comply with local ordinances. However, the impacts related to noise are temporary, would not stay in the same place for more than a few days at a time as construction moves along the alignment, and would not result in impacts to sensitive receptors
144	5.13 Noise	5.13.4.1	The analysis should distinguish between the noise standards and project effects in unincorporated Modoc County and the City of Alturas.	Please refer to Attachment F. See response to comment 143
145	5.13 Noise	5.13.4.4	This paragraph is confusing and ECORP recommends it be revised. The paragraph begins with stating that the "EPA recommends maintaining environmental noises below 70 dBA over 8-hours (typical construction day) to prevent noise induced hearing loss (EPA 1974)." The next sentence discusses interior-to-exterior noise reductions before concluding, "Therefore, a daytime 95 dBA Leq exterior noise exposure significance threshold for construction noise at residential properties is used for the project." ECORP recommends further language to justify/explain the steps leading to the 95 dBA exterior noise threshold.	Please refer to Attachment F. Modified the text to clarify the exterior to interior assumptions in text.
146	13 Noise	5.13.4.4	The Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and PEAs requires the provision of a table that identifies each phase of construction, the equipment used in each construction phase, and the length of each phase at any single location. An example table is provided in the	Please refer to Attachment F. As coordinated with CPUC and ECorp, the section was revised to include the American National Standards Institute (ANSI) Standard 12.9-2013/Part 3 "Quantities and Procedures for Description and Measurement of Environmental Sound – Part 3: Short-Term Measurements with an Observer Present" ambient

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			<p>Guidelines. Table 5.13- 7 largely fulfills this requirement and it is recognized that due to the length of the project, all specific receptors cannot feasibly be identified. However, ECORP recommends an additional table presenting this information specific to residences 25 feet distant from the project, which is the nearest distance of a receptor. This will allow for a clear identification of the limited amount of hours each construction phase would occur in proximity to an individual residence, and perhaps assist with explaining why the EPA threshold is 95 dBA.</p>	<p>noise table for the basis of ambient noise levels along the project area. To clarify, information presented in Table 5.13-7 (now 5.13-8) includes each construction method or "phase" - "Plowing-In, Open Trench, Directional Boring, Bridge Attachments, Blowing Fiber/Splicing". The table includes equipment used in each phase, the length of each phase, and the worst-case noise level generated by the equipment at 25 feet. As previously discussed with CPUC and ECorp, since the exact locations of Plowing-In, Open Trench, Directional Boring, Bridge Attachments, etc. are still being determined by project engineers, the analysis assumes all methods at worst-case. Therefore, the requested information is covered in the existing table. Additional colors and formatting were added for clarity. The 95 dBA threshold is clarified in text per comment 145.</p>
148	5.14 Population and Housing	5.14.2 Regulatory Setting	<p>At a minimum, the general plans for the relevant counties are relevant for answering Question A and should be described here.</p>	<p>Question A in the Population and Housing impact analysis addresses unplanned population growth. As outlined in the section, the project would not be growth inducing because construction would be temporary, the project would not add capacity to the roadway, and the construction crews would be local and wouldn't permanently relocate to the area. Additionally, we assessed the local general plans and there were no applicable policies that govern population growth related to fiber-optic projects. Therefore, no additional information regarding local growth projections are necessary because it would not be applicable to the project. However, the applicant has no objection to CPUC expanding on this further in the CEQA document.</p>
149	5.14 Population and Housing	5.14.4 Impact Analysis	<p>The impact on population and housing is based on 8 construction crews of 6 persons each or 48 totals. This number is not consistent throughout the document and leads to some</p>	<p>Confirmed and there is no change to this projection.</p>

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			confusion as to how many workers/crews/spreads will be working at the same time during construction. See comments on the project description.	
151	5.15 Public Services	5.15.1.1	Service Providers are listed and mapped (Figure 5.15-1); Parks are not listed in this section	Please refer to Attachment D.
152	5.15 Public Services	-	The Parks symbol is missing from the legend on pages 2,3,4,5 of 5	Please refer to Attachment D.
155	5.15 Public Services	-	Regulatory Setting. Support is needed for statement 'no regulatory background info is relevant'	There are no federal, state, or local policies applicable to the proposed project for public services. We reviewed General Plans, and other local, and state policies relevant to fiber optic projects and none were applicable to the proposed project. However, the Applicant has no objection to CPUC providing additional detail in the CEQA document.
159	5.16 Recreation	-	Maps depict only 1 of 4 BLM trails listed in Table 5.16-1; Figure 5.15-1 should depict all 4 trail locations	Please refer to Attachment D.
160	5.16 Recreation	5.16.2	Statement that no federal, state, or local regulations related to Recreation apply to the Project lacks support	There are no federal, state, or local policies applicable to the proposed project for recreation. We reviewed General Plans, and other local, and state policies relevant to fiber optic projects and none were applicable to the proposed project. However, the Applicant has no objection to CPUC providing additional detail in the CEQA document.
201	7 Cumulative Impacts and other CEQA Considerations	-	Recreation. The Shaffer Mountain Trail, Belfast Petroglyphs OHV Trail, Buckhorn Backcountry Byway, and California Historic Trail are mentioned in this section but not included in Table 7-1 or identified on any mapping.	Please refer to Attachment D.

Number	Resource	Section	Comment	Response
			These trails should be mapped either in Section 5.15, 5.16, or 7.1.	
209	Appendix B, Delineation of Potential Waters of the U.S. Report, of the BRTR (date unknown)	Executive Summary	The study area is stated as the Caltrans ROW and County road ROWs, however, the Biological Resources Study area is stated as including the ROWs as well as additional areas such as "ancillary facilities, staging areas, and material laydown areas" (in the BRTR and project description). Please clarify in the text.	Will clarify in revised Project Description
211	Appendix B, Delineation of Potential Waters of the U.S. Report, of the BRTR (date unknown)	Appendix C, Delineated Potential Waters of the U.S.	The USACE Aquatic Resources Excel Spreadsheet was not included with the submittal. Submittal of the spreadsheet and further evaluation and cross reference with data sheets will be required prior to deeming the application complete.	Please refer to Attachment G. These spreadsheets are attached to the PJD and are attached.
213	Appendix D, Botanical Resources Report, of the BRTR (dated September 16, 2020)	Figure 3	The legend should more accurately state "Biological Resources Study Area" rather than "Right-of-Way" since certain project features are located outside of the right-of-way.	Please refer to Attachment H. Figure updated to show Biological Resources Study Area instead of ROW.
214	Appendix D, Botanical Resources Report, of the BRTR (dated September 16, 2020)	Figure 3	In the legend or notes, please explain what the numbers represent in the polygons.	Please refer to Attachment H. Footnote added in legend to clarify.
215	Appendix D, Botanical Resources Report, of the BRTR (dated	4.1 Vegetation Communities	Please correct - 22 vegetation communities vs. 21.	Please refer to Attachment C. Change reflected in the PEA biological resources section.

Number	Resource	Section	Comment	Response
	September 16, 2020)			
216	Appendix D, Botanical Resources Report, of the BRTR (dated September 16, 2020)	Table 3 Vegetation Communities in the Study Area	Table 3 does not match Table 3-1 in the BRTR/Table 5.4-1 in the PEA. Please update the Botanical Report or reconcile in all reports.	BRTR/Table 5.4-1 provide the sensitive natural communities and refers to Appendix D for the full list of vegetation communities present. Table 3 in the Appendix D provides all vegetation communities, not just sensitive natural communities.
229	Appendix I Paleontology	Table 3	"Not Reported" is odd. Not sure what this category actually signifies. On page 20, it includes taxa from databases. On following pages, it can contain only taxa without locality numbers. Please clarify what this means.	The use of "Not Reported" is generally reserved for localities with only the taxa listed in the literature and no accompanying locality numbers. In the case of table 3, several of the sources were from literature that did not specifically reference the locality numbers. Localities reported on online databases (i.e., PBDB and UCMP), however, do generally contain this specific information; and therefore, the numbers from these references should have been included in the report table. Please refer to Attachment I with revised Table 3 from the Paleo Resources Report.
256	Additional Sections with GIS Requirements	5.7.1.5 - Paleontological Resources	missing GIS data	Please refer to Attachment E.