

ATTACHMENT A
November 13, 2020 Initial Comment Response Matrix

Zayo Group Prineville to Reno Fiber Optic Line Project (A2010008) CPUC Completeness Review Responses - November 13, 2020

Comment Number	Resource	Section	Comment	Response
1	Cover	Cover	Cover should follow sample in PEA checklist, including map, filing date, and names and email addresses for applicant and preparer contacts	Noted and Applicant has no objection to correction being made in CEQA document as appropriate and necessary.
2	Section 1 Executive Summary	General	The section follows the PEA outline requirements. Specific comments on the content that is summarized in this section are provided in the applicable sections of the PEA.	Noted
3	Section 2 Introduction	2.2 Pre-Filing Consultation and Public Outreach	Summarize discussions with the federal agencies regarding NEPA compliance. Have the counties been contacted?	Coordination with the Counties and federal agencies is ongoing. Will provide update.
4	Section 2 Introduction	2.3.1 CEQA Review	Please identify other state agencies that have discretionary permitting authority in this section and all potential involvement by federal, state, and local agencies not expected to have discretionary permitting authority (e.g. ministerial actions).	Will make this change.
5	Section 2 Introduction	2.3.1 CEQA Review	Zayo's CPCN was granted to another firm in the 1990s, which it appears was purchased in 2007. This CPCN was part of the batch process. Please clarify. Please add additional description why further CEQA documentation is required (extending beyond the utility ROW, etc.) from the actual application.	Will update this description in the revised Project Description.
6	Section 2 Introduction	2.3.1 NEPA Review and Table 2.3-1 Federal Land Ownership and Level of NEPA Analysis	It was our understanding that the BLM is the federal Lead Agency and that the USFWS and Forest Service were cooperating agencies on the NEPA document. Please confirm. If there are really five separate documents being prepared, please describe how these documents will be coordinated among the federal lead agencies.	Confirmed that BLM is the NEPA and Section 106 lead. Five separate documents are being prepared and they are all under the purview of Tara McLain (BLM) and Penni Borghi (BLM-assigned USFS representative) who are coordinating all NEPA actions for this project.
7	Section 3 Project Description	Glossary	The glossary of terms is appreciated.	Noted
8	Section 3 Project Description	General	This section emphasizes federal, tribal, and CDFW and Caltrans lands, permits, and approvals. There is insufficient description of the counties/cities that are within the proposed project area, private lands, etc.	Will update this description in the revised Project Description.
9	Section 3 Project Description	3.1 Project Overview	This section should outline and describe all of the affected jurisdictions traversed by the project. How much in each county/city?	Will update this description in the revised Project Description.
10	Section 3 Project Description	3.2 Existing and Proposed System	There is not much detail in this section and on the maps. The map set does not clearly show where the project leaves and rejoins the US 395 ROW. The description states "Standish to Buntingville", but Buntingville is not shown on the map. Recommend a different color or other differentiator for this portion of the alignment.	Will update these maps in the revised Project Description.

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11	Section 3 Project Description	3.2.1 Existing System	The section states that the proposed project would provide a redundant system, but the existing system itself is not described. Information on the users of the existing system is not provided. See requirements on page 14 of PEA Guidelines.	The applicant is connecting this project to an existing project far to the east in order to provide a redundant system. There is no existing system in the proposed project region. This will be clarified in the revised Project Description.
12	Section 3 Project Description	3.2.2 Proposed Project System	Reference the cumulative impacts analysis in this section. States that the Oregon and Nevada technical studies "will be" incorporated by reference into the PEA, but these have not been incorporated by reference or provided to CPUC in order to conduct cumulative impact analysis.	Will provide Oregon and Nevada technical studies.
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	Will provide engineering typicals; locations were provided in the GIS package on 11/11/20.
15	Section 3 Project Description	3.4.1 Land Ownership	According to the text, the majority of the alignment is within Caltrans-managed ROW, but nowhere in the text or Table 3-1 do you say how much of the project is in Caltrans ROW. Detail is only shown for the land ownership for the running line, reflecting operation of the project, but does not reflect the land ownership for project construction including the area of disturbance around the running line, ILAs, staging areas, and material storage yards. Please add a table fully describing the acreage of each element of the project (like in Table 3-3) and the different land owners for each component.	Will provide updated maps and tables for land use in the revised Project Description
16	Section 3 Project Description	3.4.1 Land Ownership	Describe how any new temporary or permanent easements as described would be acquired (Pg 20 of PEA Guidance)	Will clarify in revised Project Description
17	Section 3 Project Description	Table 3-1	This table only shows land ownership underlying the running line, and not the entire project (area of disturbance around the running line, ILAs, staging areas, and material storage yards). CDFW and Hallelujah Junction Wildlife Area are shown as separate lines, but the Wildlife Area is also owned by CDFW. The table lumps all of the land not owned by federal or state resource agencies into one category. Please split out Caltrans, local government, and private lands.	Will provide updated maps and tables for land use in the revised Project Description
18	Section 3 Project Description	Sections 3.5 and 3.6	These sections do not completely follow the required subsection numbering in the PEA Guidelines	Subsections that were not applicable to this type of project were omitted.

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19	Section 3 Project Description	3.5.1.2 Watercourse Crossings	Confirm that even the minor watercourses have existing bridges and no watercourse crossings are required, even for boring.	Assume that all aquatic features will be bored beneath (with no impacts to riparian vegetation); large crossings with adequate bridges will have cable hung on the bridge; and select, CDFW-approved minor crossings will be trenched. GIS data for all forthcoming.
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
22	Section 3 Project Description	3.5.3.1 Construction Work Areas	It is not described or shown in tables or maps approximately how much of the FO line would be constructed by trenching or plowing, how many bridges would be affected by bridge attachment (and where are they) and how many watercourses would be crossed with directional boring (and where are they).	Assume that all aquatic features will be bored beneath (with no impacts to riparian vegetation); large crossings with adequate bridges will have cable hung on the bridge; and select, CDFW-approved minor crossings will be trenched. GIS data for all forthcoming.
23	Section 3 Project Description	3.5.3.1 Construction Work Areas	Lack of detail on what construction work site looks like for a directional bore and lack of detail on probable bore sites and location.	Will clarify in revised Project Description
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.	Dimensions of work areas (staging areas, materials staging yards, temp and perm disturbance footprint) were provided as part of GIS package on 11/11/20
25	Section 3 Project Description	3.5.5.1 Conduit Installation	There are several details missing from the descriptions of conduit installation techniques that are required in the PEA Guidelines, including location information. Please provide the information in 3.5.6.1 (page 26) and 3.5.6.2 (page 27) of the PEA Guidance. Will trenches and pits be restored beyond compaction?	Will clarify in revised Project Description
26	Section 3 Project Description	3.5.6.1 Public Safety and Traffic Control	The PEA Guidelines require a preliminary Traffic Control Plan for the project.	This information is typically not available until later in the design process and is not required to produce an adequate CEQA analysis. Performance standards for plan, when developed, can be included in the CEQA document.
27	Section 3 Project Description	3.5.10.4 Livestock	This section from the PEA Guidelines is missing.	Noted. Sections that are not applicable to this project were omitted.
28	Section 3 Project Description	3.5.9 Water Use and Dewatering	This section outlines the number of construction spreads as 3. See previous comment on confusion on number of construction teams	Will clarify in revised Project Description

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29	Section 3 Project Description	3.5.10.2 Hazardous Materials Management	Section 3.5.13.2 (page 30) of the PEA Guidelines require submittal of the referenced plans as appendices to the PEA.	This information is typically not available until later in the design process and is not required to produce an adequate CEQA analysis. Performance standards for plan, when developed, can be included in the CEQA document.
30	Section 3 Project Description	3.5.11.1 Solid Waste	The PEA Guidelines require estimates of total volume of solid waste, recyclable materials, and the locations of appropriate disposal or recycling facilities.	Will clarify in revised Project Description
31	Section 3 Project Description	3.5.11.2 Liquid Waste	identify disposal locations	Will clarify in revised Project Description
32	Section 3 Project Description	Hazardous Waste	The Hazardous Waste section is missing (see 3.5.14.3 on page 30 of the PEA Guidelines)	Will clarify in revised Project Description
33	Section 3 Project Description	3.15.2 Fire Prevention and Response	The construction fire prevention plan is required to be attached to the PEA.	This information is typically not available until later in the design process and is not required to produce an adequate CEQA analysis. Performance standards for plan, when developed, can be included in the CEQA document.
34	Section 3 Project Description	3.6.2 Construction Equipment	A table equivalent to Table 5 in the PEA Guidelines is not provided (page 31 of the Guidelines).	Will clarify in revised Project Description
35	Section 3 Project Description	3.6.4 Construction Schedule	Provide the proposed construction schedule (e.g., month and year) for each segment or project component and for each construction activity and phase. Identify seasonal considerations that may affect the construction schedule, such as weather or anticipated wildlife restrictions. The construction schedule should account for these factors.	Will clarify in revised Project Description
36	Section 3 Project Description	Work Schedule	This section of the PEA is not provided (see section 3.6.5 of the PEA Guidelines page 32). A portion of the information is provided in Section 3.6.4, but item b) is not provided.	Will clarify in revised Project Description
37	Section 3 Project Description	3.6.4 Construction Schedule	This section implies that no nighttime construction will occur. However, in several sections of the PEA (bio/energy) indicates there could be nighttime construction or lighting.	No nighttime construction will be undertaken. Will clarify in analyses and APMs.
38	Section 3 Project Description	3.11 Applicant Proposed Measures	Section 3.6.4 states that no nighttime construction will occur. If nighttime construction is a possibility, please describe in Section 3.6.4.	No nighttime construction will be undertaken. Will clarify in analyses and APMs.
39	Section 3 Project Description	3.6.1 Construction Workforce and Table 3-4	Here the project says that there are 8 crews of six people. Table 3-4 shows 11 crews. Elsewhere in the project description (e.g., Section 3.5.9 water use) it says three construction spreads. Please explain and clarify the discrepancy between 8 and 11 crews, and how these crews would be distributed among the spreads.	Will clarify in revised Project Description
40	Section 3 Project Description	3.6.3 Construction Traffic	Explain the reasoning behind the one-way trip length of 30 miles.	Will clarify in revised Project Description

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41	Section 3 Project Description	3.6.4 Construction Schedule	The construction schedule indicates that it will take 6 months to build the project based on 6 crews working concurrently. Please clarify with other statement of 8 crews, 11 crews, and 3 spreads.	Will clarify in revised Project Description
42	Section 3 Project Description	3.7 Post Construction	Will any testing/configuration be required? If so describe. Will landscaping/screening be required at the ILA facilities by local jurisdictions?	Will clarify in revised Project Description
43	Section 3 Project Description	3.8 Operation and Maintenance	This section is brief and does not include all the subsections required in the PEA Guidelines (page 33).	Will clarify in revised Project Description
44	Section 3 Project Description	3.9 Decommissioning	The section provides no detail nor does it provide a reference to details available in another section or appendices.	Will clarify in revised Project Description
45	Section 3 Project Description	3.10 Anticipated Permits and Approvals	Table 3-6 is referred to as Table 3-7 in text. The list provided seems too short and does not include potential approvals required from all of the landowners. The list does not include the district/office representative for each permit or status of each permit and date filed/planned to file. In general, details required in Section 3.10 of the PEA Guidelines (page 34 and example table 6 on page 36) are not provided. Specific comments below.	Will clarify in revised Project Description
46	Section 3 Project Description	3.10 Anticipated Permits and Approvals	U.S. Fish and Wildlife Service. There is a typo in the agency's name. The agency's land use approval is not included.	Noted and Applicant has no objection to correction being made in CEQA document as appropriate and necessary.
47	Section 3 Project Description	3.10 Anticipated Permits and Approvals	Row after USFWS - meaning of this line is unclear.	Will clarify in revised Project Description
48	Section 3 Project Description	3.10 Anticipated Permits and Approvals	CPUC - add CPUC approvals	Will clarify in revised Project Description
49	Section 3 Project Description	3.10 Anticipated Permits and Approvals	California SHPO- is on the table twice. Combine the Section 106 & Impact concurrence lines	Noted. Will update.
50	Section 3 Project Description	3.10 Anticipated Permits and Approvals	The table shows that encroachment and grading permits are needed from Modoc and Sierra counties, but elsewhere the Project Description states that the alignment is entirely in the Caltrans ROW except for in Lassen County. What are the facilities in Modoc and Sierra counties that require encroachment permits?	Will clarify in revised Project Description
51	Section 3 Project Description	3.10 Anticipated Permits and Approvals	table footnotes are missing	Will clarify in revised Project Description

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52	Section 3 Project Description	3.10 Rights of Way	The brief description of ROWs and easements lack detail or reference to another section or the appendices for more details. This section states that encroachment permits are required for agencies that are not listed in Table 3-6. This section states that encroachment permits are needed from Modoc and Sierra counties, but elsewhere the Project Description states that the alignment is entirely in the Caltrans ROW except for in Lassen County. What are the facilities in Modoc and Sierra counties that require encroachment permits?	Will clarify in revised Project Description
53	Section 3 Project Description	3.11 Applicant Proposed Measures	Additional comments on mitigation are included in the comments for technical sections and should be mirrored here.	Noted
54	Section 3 Project Description	3.11 Applicant Proposed Measures	Change "accepted" to "excepted". Define "normal wear and tear". Since the stanging areas have been identified, are they or are they not within public view? The second sentence makes it sound like the locations are yet to be identified.	Will clarify in revised Project Description
55	Section 3 Project Description	3.11 Applicant Proposed Measures	Change "should" to "shall"	Will clarify in revised Project Description
56	Section 3 Project Description	3.11 Applicant Proposed Measures	Change "should" to "shall"	Will clarify in revised Project Description
57	Section 3 Project Description	3.11 Applicant Proposed Measures	The applicable portions of the Greenhouse Gas emissions measures on page 84 of the PEA Guidelines should be added to this section and the GHG technical section.	Will clarify in revised Project Description
58	Section 4 Alternatives	Section 4 Alternatives	This section does not follow the PEA Guidelines. The applicant states that several alternatives have been evaluated during the design process, but does not describe any of them in detail. Even if the alternative is eventually rejected, it must be described.	Alternatives considered and rejected will be provided in narrative format.
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
60	Section 4 Alternatives	4.1 Alternatives Considered	The Applicant outlines the miles of project alignment on each type of land ownership but provides no detailed maps showing this assessment graphically either in this section, the PD or the appendix.	Will provide updated maps and tables for land use in the revised Project Description

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61	Section 4 Alternatives	4.3 Rejected Alternatives	The Applicant briefly outlines the screening process for determining if Alternatives either meet the project objectives, did not meet them, or was an environmentally superior project. The conclusions is that there are no feasible or better alternatives than the proposed project. The Applicant provided no descriptions or examples of the alternatives that were analyzed and rejected, instead describing the process of developing the Proposed Project.	Alternatives considered and rejected will be provided in narrative format.
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
63	5.1 Aesthetics	5.1.1.2	Provide the following information for each photograph: i. Capture time and date ii. Camera body and lens model iii. Lens focal length and camera height when taken Provide GIS Data associated with each photograph location that includes coordinates (<1 meter resolution), elevations, and viewing directions, as well as the associated viewpoint.	Will provide this information
64	5.2 Agriculture and Forestry Resources	General	No GIS data provided for agricultural and forestry resources in the project area.	These data are unavailable for the project area
65	5.3 Air Quality	5.5.1.1	<i>The Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and PEAs</i> requires the identification and description of all applicable air quality plans. ECORP recommends that the analysis describe that there are no applicable air quality plans specific to the Northeast Plateau Air Basin or Mountain Counties Air Basin.	Applicant agrees that there are no specific applicable air qualities as noted in this comment and agrees that the proposed language is appropriate for inclusion in the CEQA document. No further response required.

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66	5.3 Air Quality	5.3.2.3	This paragraphs states that the Modoc County APCD, Lassen County APCD and Northern Sierra AQMD have not established emissions thresholds for pollutants generated from construction or operations of development projects. However, the Northern Sierra AQMD does have established emission thresholds for criteria air pollutants. ECORP recommends comparing Project emissions to these thresholds, at least those emissions generated in Sierra County. https://www.mynevadacounty.com/DocumentCenter/View/15131/NSAQMD-Attachment-Land-Use-Guidelines-PDF	Will provide this information
67	5.3 Air Quality	5.3.2.2	This paragraph notes that project emissions are compared to thresholds established by the nearby Placer County Air	Will provide this information
68	5.3 Air Quality	5.3.4 (Impact a)	This paragraph notes the reduction in NOx emissions attributable to measure APM Air 2. ECORP recommends including/identifying reductions to PM ₁₀ as well.	Applicant agrees with the inclusion of PM10 in this discussion in the CEQA document is appropriate. No further information is required.
69	5.3 Air Quality	5.3.4 (Impact b)	Project emissions are compared to thresholds established by the PCAPCD. See previous comments concerning significance thresholds.	Noted
70	5.3 Air Quality	5.3.4 (Impact b)	<i>The Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and PEAs</i> requires that air pollutant emissions be modeled for each air basin. Currently the analysis appears to identify daily emissions for project construction with no distinction of air basin. It is acknowledged that daily emissions would likely be the same in each of the two air basins. This should be clarified.	Will include this clarification
71	5.4 Biological Resources	General	Please add a brief discussion about the risk of spread of RHDV2 virus and its potential effects on wild rabbit populations and ensure that APM BIO-6 addresses this risk as well (or consider adding a new APM).	This virus was first discovered in California in May 2020 and has not yet been documented north of San Bernardino County. Address in CEQA document if desired.

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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.	As discussed on November 5, 2020, the survey areas vary according to the resources at issue and potential impact. Additional clarifying information will be provided.
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> .	Noted
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.	Response is under discussion and will be provided at a later date.
75	5.4 Biological Resources	5.4.1.5, Habitat Assessment	The second sentence should be clarified to say "They identified the following special status species: 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.	Applicant agrees that it is appropriate to include the proposed sentence in the CEQA analysis. No further information required.
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.	Will include this clarification

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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.	Will update this analysis per your recommendation.
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 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.	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 table in this section will be updated to reflect WOUS rather than appearing to double-count WOUS and Waters of the State.
79	5.4 Biological Resources	5.4.2, Regulatory Setting	The regulatory setting does not have a section discussing whether the Project is within a Habitat Conservation Plan area as required in Section 5.4.2.2, Habitat Conservation Plan, of the PEA checklist. Please add.	Applicant confirms that the project is not located within a Habitat Conservation Plan area and agrees that inclusion of this information is appropriate in the CEQA document. No additional information is required.
80	5.4 Biological Resources	5.4.4, Impact Analysis	The last two sentences should be removed from the paragraph. They represent preliminary comments by regulatory agencies, are already stated in Chapter 3, and are not relevant to the impact analysis introduction.	Applicant agrees that this information can be removed from the impact analysis in the CEQA document. No further information is required.
81	5.4 Biological Resources	5.4.4.1, Special Status Plants	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.	Noted

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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. Will clarify the description in the text.
83	5.4 Biological Resources	5.4.4.1, Special Status Plants	Despite implementation of APMs, special status plants that are disturbed and that are on privately owned property and restricted from revegetation or restoration by the land owner would be considered a significant unavoidable impact on special status plant species. In addition, for special status plant populations that are disturbed where conservation measures (e.g., credits, restoration, etc.) are not available, feasible, or successful would be considered a significant unavoidable impact on special status plant populations. Impacts on special status plant populations should be considered significant and unavoidable rather than less than significant.	CEQA specifies that a significant and unavoidable impact would result only from a population-level decline. None of the special status plant species observed in surveys would experience a population-level decline even if the observed individuals were permanently removed by this project. Accordingly, impacts to special status species are less than significant.
84	5.4 Biological Resources	5.4.4.1, Special Status Plants	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.	Agreed. Will update accordingly.
85	5.4 Biological Resources	5.4.4.2, Special Status Wildlife	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 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.	Agreed. Will update accordingly.
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).	Agreed. Will update accordingly.
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.	Will address in comment response

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Comment Number	Resource	Section	Comment	Response
88	5.4 Biological Resources	5.4.4.2, Special Status Wildlife	Despite implementation of APMs, areas of native habitat that are disturbed and that are on privately owned property and restricted from revegetation or restoration by the land owner would be considered a significant unavoidable impact on native habitat. In addition, areas that are not successfully revegetated and/or restored would be considered a significant unavoidable impact on native habitat. Impacts on native habitat should be considered significant and unavoidable rather than less than significant.	There will be no permanent disturbance to riparian habitat or sensitive natural communities and thus impacts would not be considered significant and unavoidable.
89	5.4 Biological Resources	Impact Question b) Have a substantial adverse effect on any riparian habitat or other natural community..."	Despite implementation of APMs, areas of native habitat that are disturbed and that are on privately owned property and restricted from revegetation or restoration by the land owner would be considered a significant unavoidable impact on native habitat. In addition, areas that are not successfully revegetated and/or restored would be considered a significant unavoidable impact on native habitat. Impacts on native habitat should be considered significant and unavoidable rather than less than significant.	CEQA does not govern impacts to "native habitat." See Comment 88 response regarding sensitive natural communities and riparian habitat.
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

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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 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	See response to Comment 78
92	5.4 Biological Resources	Table 5.4-5	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.	See response to Comment 78
93	5.4 Biological Resources	Impact Question d) Interfere substantially with the movement of resident migratory...or use of native wildlife nursery sites...	The impact analysis on greater sage-grouse leks should be included or referenced here.	Will address in comment response
94	5.4 Biological Resources	Impact Question e) Conflict with local policies...	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."	Agreed. Will update accordingly.

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95	5.4 Biological Resources	5.4.5, Draft Environmental Measures	The introductory text should be in the impact analysis rather than presented in this subsection. In addition, the discussion of alternative routes directed by Caltrans should be in the alternatives dismissed section rather than here. The last sentence in the introductory text could remain but should be revised as "The following APMs would be implemented by the applicant to reduce potential impacts on biological resources." (or similarly stated).	Applicant has no objection to reorganization in the CEQA document of information provided in the PEA. No further information required.
96	5.4 Biological Resources	5.4.5, Draft Environmental Measures	To be considered fully feasible and enforceable, it is recommended that each APM contain the following (or similar) language: "Plan Requirements: This measure shall be printed on construction drawings. Timing: This measure shall be implemented during construction as well as during repair and maintenance activities. Monitoring: This applicant, or applicant's designee, shall be responsible for implementation."	Applicant has no objection to inclusion of this language in the CEQA document. No further information required.
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.	Applicant has no objection to inclusion of this condition in the CEQA document. No further information required.
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.	Applicant has no objection to inclusion of these condition in the CEQA document. No further information required.
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.	Applicant has no objection to inclusion of these condition in the CEQA document. No further information required.
100	5.4 Biological Resources	5.4.5, Draft Environmental Measures	Since this measure only protects special status plants rather than all botanical resources, it may be best to combine this measure with measure APM BIO-9.	Applicant has no objection to inclusion of these condition in the CEQA document. No further information required.

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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, <u>and</u> complete..."	Applicant has no objection to inclusion of these condition in the CEQA document. No further information required.
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 address in comment response
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.	Currently, no dewatering is being proposed. If this becomes a possibility, performance standards for the Dewatering Plan can be included in the CEQA analysis.
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.	Will update this measure.
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 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.	Pending BLM submittal of cultural report to ECorp
106	5.5 Cultural Resources	5.5.1.2	The PEA states that the applicant's consultant carried out a records search with the California Historical Resources Information System Information Centers. Please clarify whether or not the records search also included the BLM and USFS files, which often are not duplicated at the Information Centers.	Will clarify.

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107	5.5 Cultural Resources	5.5.1.3	More than half of the APE is described as being under "Undefined" ownership. Please clarify.	Will provide updated maps and tables for land use in the revised Project Description
108	5.5 Cultural Resources	5.5.2.2	The PEA does not include a discussion of unique archaeological resources in the regulatory context.	Applicant has no objection to inclusion of this information in the CEQA document. No further information required.
109	5.5 Cultural Resources	5.5.3	The impact table indicates that the project would have a Less Than Significant impact on historical resources, archaeological resources, and human remains; however, this text in this section seems to support a finding of Less Than Significant with Mitigation Incorporated. Upon receipt of the cultural resources technical studies, including the recommendations for eligibility of the remaining un-evaluated sites, we will review the information to determine whether or not such a finding is appropriate. Until then, these findings and the draft environmental measures are considered to be for discussion purposes only.	Noted
110	5.5 Cultural Resources	5.5.5	Draft environmental measure CR-4 appears to defer the determination of significance for currently known resources to a point that is outside of the CEQA process, which may conflict with CEQA case law (Madera Oversight Coalition v. Tesoro Viejo and County of Madera, 2012). Please provide evaluations for all known cultural resources within the APE. CPUC acknowledges that such a measure would be appropriate for addressing unanticipated discoveries, but not for known resources.	Will provide this information as part of the cultural report submittal.
111	5.5 Cultural Resources	5.5.5	The PEA includes APM CR-4 and CR-6, but does not include an APM CR-5. Please clarify if this was a numbering error, or if an APM was inadvertently omitted.	Will update numbering.
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.	Will provide this GIS data and update figures.
113	5.7 Geology, Soils, and Paleontological Resources	5.7.1.6	The Geology and Paleosensitivity Maps are Appendix A, not Attachment A, of Paleontological Resources Constraints Analysis (Appendix I). Please revise the text.	Applicant has no objection to inclusion of this information in the CEQA document. No further information required.
114	5.7 Geology, Soils, and Paleontological Resources	5.7.1.7	Appendix J includes the Soils Mapbook for the project alignment as requested in the PEA Checklist Guidelines. Be sure to provide associated GIS data.	Will provide this GIS data and update figures.
115	5.7 Geology, Soils, and Paleontological Resources		Please see the comments for the Paleontology appendix.	Noted

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116	5.8 Greenhouse Gas Emissions	5.8.2.3	Provide language to justify the use of the PCAPCD GHG threshold, which was established for Placer County (e.g., similarities in air basin geography, etc.).	Will clarify as suggested.
117	5.8 Greenhouse Gas Emissions	5.8.4	Attachment 4 of the <i>Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and PEAs</i> identifies several construction-specific environmental measures that are required to be implemented in order to reduce greenhouse gas emission-related impacts. These measures are not identified in the PEA.	Response is under discussion and will be provided at a later date.
118	5.9 Hazards, Hazardous Materials, & Public Safety	General	Please provide the Safety Data Sheets for the proposed bore mud (bentonite clay mud as well as the diluent), drilling fluid (if separate from bore mud), and lubricant for conduit proofing.	Will provide.
119	5.9 Hazards, Hazardous Materials, & Public Safety	General	Impacts associated with any proposed use of herbicides either during construction or during operation of the project should be discussed in this section.	Agreed. Will update accordingly.
120	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.1.1, Hazardous Materials Report	Last sentence should read "Table 5.9-1 below shows the potential hazardous waste sites within or adjacent to the project."	Applicant has no objection to the proposed clarification being included in the CEQA document. No further information required.
121	5.9 Hazards, Hazardous Materials, & Public Safety	Table 5.9-1	In the field "Distance to the Project," the information provided does not give enough information to determine if the hazardous waste site is actually in the project site vs. adjacent to the project site.	Maps included in the attached EDR report can be used to determine the location of hazardous waste sites relative to the running line. All hazardous waste sites identified in the EDR occur outside the direct impact footprint.
122	5.9 Hazards, Hazardous Materials, & Public Safety	Impact a) Create a significant hazard...through the routine transport, use, or disposal of hazardous materials?	Please elaborate on the procedures that will be used for conduit proofing and how the lubricant will be used and controlled from spilling to grade. Discuss whether lubricant will also be used when pulling line through the conduit and describe the process and methods for preventing spills or leaks to grade. Please also elaborate what methods would be employed to prevent material (e.g., concrete debris, paint chips etc.) from falling into waterways during installation of lines on bridges.	Will clarify in revised Project Description

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123	5.9 Hazards, Hazardous Materials, & Public Safety	Impact d) Be located on a site which is included on a list of hazardous materials sites compiled...	The impact analysis concludes that there are several potentially hazardous materials sites located within the construction work area and adjacent to project construction activities as shown in Table 5.9-1. In addition, there is the potential for Aerially Deposited Lead (ADL) within the ROW of US 395 as well as pesticides in soil due to agricultural uses in the project area. Under Caltrans' direction, and in accordance with Caltrans' procedures and requirements, the Applicant shall prepare an Initial Site Assessment (ISA) and if warranted as a result of the ISA, a Preliminary Site Investigation (PSI), prior to deeming the PEA application complete in order to properly analyze impacts associated with potential hazardous substances in the project area. Additional investigations may be required as part of completion of CEQA documentation, depending up the results of these investigations.	Response is under discussion and will be provided at a later date.
124	5.9 Hazards, Hazardous Materials, & Public Safety	Impact g) Expose people or structures, either directly or indirectly, to a significant risk...involving wildland fire?	Please discuss that no "hot work" (i.e., welding or grinding) are proposed. Please reference the Wildland Fire section of the PEA for more discussion. Specifically discuss the potential for wildland fires to be started from hot vehicle and equipment tailpipes and measures that will be taken to minimize this risk.	No hot work will be done as part of conduit installation. Hot work may be required to repair equipment, and in that case, would be done within staging or materials storage yards. Latter portion of comment will be addressed in comment response
125	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.6 Draft Environmental Measures	An SPCC Plan is a regulatory document required under the SPCC Rule (40 CFR 112) which is only applicable to certain types of projects involving drilling, producing, gathering, storing, processing, refining, transferring, distributing, using or consuming oil. Therefore, the SPCC Rule is not applicable to this project. A more appropriate title for APM HAZ-1 may be "Hazardous Materials Management Plan" to govern the use and handling of "hazardous materials" during construction, maintenance, and repairs of the lines (i.e., diesel fuel, gasoline, oil for vehicles, hydraulic fluid, bore mud, drilling fluid, lubricant for conduit proofing, and any herbicide use). The first and second bullets from the measure should be removed and put into another APM to establish procedures for dealing with "hazardous waste" that could be in the study area (which is distinct and different from "hazardous materials" from a regulatory standpoint).	Agree to your suggested revisions. Will update accordingly.

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126	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.6 Draft Environmental Measures	The following language is recommended to be added to APM HAZ-1 to ensure proper disposal of drilling muds associated with directional drilling: "All drilling muds, slurries, oils, oil-contaminated water, and other waste materials removed from the bore hold or otherwise used during the Project shall be disposed of at a permitted landfill, other appropriately permitted site, or at an upland site approved in advance by the Regional Water Quality Control Board."	Agree to your suggested revisions. Will update accordingly.
127	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.6 Draft Environmental Measures	The following language is recommended to be added to APM HAZ-1 to ensure that proper secondary containment is used for all stationary diesel generators on the project site: "All stationary diesel generators associated with the project (e.g., for light plants, ILAs) shall have secondary containment."	Agree to your suggested revisions. Will update accordingly.
128	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.6 Draft Environmental Measures	Please correct the second to last sentence "These plans would be implemented in <u>conjunction</u> with the SWPPP..."	Agree to your suggested revisions. Will update accordingly.
129	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.6 Draft Environmental Measures	It may be more appropriate to retile APM HAZ-3 to "Surface Spill and Hydrofracture Contingency Plan" so as not to be confused with APM HAZ-1.	Agree to your suggested revisions. Will update accordingly.
130	5.9 Hazards, Hazardous Materials, & Public Safety	5.9.6 Draft Environmental Measures	The following language is recommended to be added to APM HAZ-3 to establish procedures to take to minimize the risk of frac-outs and establish procedures to manage a frac-out situation: "The Applicant shall monitor drill mud pressure and volume at all times during drilling to ensure that hydrofracture or other loss of drill muds has not occurred. In the event of sudden loss in pressure or volume, the Applicant shall take appropriate steps according to the Surface Spill and Hydrofracture Contingency Plan to ensure that drilling muds are not discharged to sensitive habitat."	Will address in comment response
131	5.10 Hydrology & Water Quality	General	Please see comments on Section 5.9, Hazards, Hazardous Materials, and Public Safety	Noted
132	5.10 Hydrology & Water Quality	5.10 Hydrology and Water Quality	The last sentence should be in the impact analysis rather than the introduction.	Applicant has no objection to the proposed change being included in the CEQA document. No further information required.
133	5.10 Hydrology & Water Quality	5.10.1.1 Water Bodies and Table 5.10-1	The last sentence and Table 5.10-1 report that "right-of-way" crosses the water body. It would be more appropriate if "study area" were used, with a definition of the study area included as certain project features occur outside of road right of ways.	Applicant has no objection to the proposed change being included in the CEQA document. No further information required.

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Comment Number	Resource	Section	Comment	Response
134	5.10 Hydrology & Water Quality	5.10.1.4 Groundwater Wells and Springs	In the second to last sentence, it is stated that "No springs were found within 150 feet of the project site." However, Table 3-3 on page 3.9 of the Biological Resources Technical Report reports 1.75 acres of "wetland seep springs" in the Biological Resources Survey Area. Please reconcile and analyze impacts.	Agree to your suggested revisions. Will update accordingly.
135	5.10 Hydrology & Water Quality	5.10.2.2 State (Regulatory Setting)	State Water Resources Control Board and/or Regional Water Quality Control Board General Waste Discharge Requirement Orders should be mentioned if any discharges associated with dewatering during construction activities are planned.	Will provide this information.
136	5.10 Hydrology & Water Quality	5.10.4 Impact Analysis	Per the PEA checklist, the PEA should explicitly state that no hydrostatic testing will be performed.	Hydrostatic testing is not performed for fiber-optic projects. Will clarify this in the revised Project Description.
137	5.10 Hydrology & Water Quality	Impact a) Violate any water quality standards or waste discharge requirements...	Second sentence, strike "not" in "staging areas would not be cleared..." Please discuss how sidecast would be managed along the line and potential for water quality impacts associated with stormwater runoff off sidecast areas during construction. Please discuss seasonal restrictions on work during a rain event.	Applicant has no objection to the proposed change being included in the CEQA document. No further information required.
138	5.10 Hydrology & Water Quality	Impact a) Violate any water quality standards or waste discharge requirements...	Please see comments on APM HAZ-3, regarding the frac- out plan. Please explicitly discuss that entry and exit pits would be also be utilized for stockpiling of drill cuttings in addition to catching drill slurry and any groundwater ingress. Please discuss restrictions on directional drilling during rain events. Please discuss whether any discharges associated with the dewatering of entry or exit pits during directional drilling is anticipated(i.e., what will be done with the water stored in tanks if used).	Will clarify in revised Project Description
139	5.10 Hydrology & Water Quality	Impact iv) Impede or redirect flood flows...	The statement that "The project does not cross a FEMA 100-year floodplain." appears to be incorrect. Please plot the Project study area on FEMA FIRM maps to determine (e.g., using FEMA's National Flood Hazard Layer Viewer) and discuss impacts.	Will update impact analysis
140	5.10 Hydrology & Water Quality	Impact e) Conflict with...water quality control plan...	Please discuss whether any discharges associated with the dewatering of entry or exit pits during directional drilling is anticipated(i.e., what will be done with the water stored in tanks if used).	Will clarify in revised Project Description

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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.	Will clarify
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.	Response is under discussion and will be provided at a later date.
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 discussed. ECORP recommends that the analysis identify City of Alturas noise standards since land uses in the City will be affected by the project.	Will include this information
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.	Will revise as suggested
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.	Will revise as suggested

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146	5.13 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 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.	Response is under discussion and will be provided at a later date.
147	5.14 Population and Housing	5.14 Population and Housing	This is a table based on US Census Bureau American Fact Finder and contains 2017 estimates. American FactFinder has been decommissioned, and more up-to-date estimates are available on the census bureau webpage.	The applicant has no objection to this new data source being used to inform the analysis in the CEQA doc. No further information required.
148	5.14 Population and Housing	5.14.2 Regulatory Setting	At a minimum, the general plans for the relevant counties are relevant for answering Question A, and should be described here.	Will revise as suggested
149	5.14 Population and Housing	5.14.4 Impact Analysis	The impact on population and housing is based on 8 construction crews of 6 persons each or 48 total. This number is not consistent throughout the document and leads to some confusion as to how many workers/crews/spreads will be working at the same time during construction. See comments on the project description.	Will clarify in revised Project Description
150	5.14 Population and Housing	5.14.5	Instead of the Applicant statement, " There are no applicable environmental measures for population and housing" a more accurate statement would be "no significant impacts to area population and housing can be attributed to the proposed project. Therefore, no mitigation measures are required.	Applicant concurs with inclusions of the proposed language in the CEQA document. No further information required.
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	Recreational facilities are included on the maps for Public Services. Will confirm there are no parks to be included.
152	5.15 Public Services		The Parks symbol is missing from the legend on pages 2,3,4,5 of 5	Noted and Applicant has no objection to correction being made in CEQA document as appropriate and necessary.
153	5.15 Public Services		Police and Fire response performance standards are identified	Noted

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154	5.15 Public Services		Lassen County average fire response times are identified as unavailable	Noted
155	5.15 Public Services		Regulatory Setting. Support is needed for statement 'no regulatory background info is relevant'	Will clarify in text.
156	5.15 Public Services		Fire and Police Protection response time less than significant impact is supported	Noted
157	5.15 Public Services		Schools, Parks, and Other Public Facilities impact conclusions are adequately supported	Noted
158	5.16 Recreation	5.16.1.1	Parks, Rec Areas and Major Trails are listed with Jurisdiction, Facilities/Activities, Size, Annual Visitation	Noted
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	Will update figure.
160	5.16 Recreation	5.16.2	Statement that no federal, state or local regulations related to Recreation apply to the Project lacks support	Will clarify in text.
161	5.16 Recreation	5.16.4	Impact conclusions a), b), c), d), e) are adequately supported by the analyses and details provided	Noted
162	5.16 Recreation	5.16.5	This measure re: Coordination with BLM on trail closures and documenting preconstruction conditions is appropriate	Noted
163	5.17 Transportation	5.17.1.1	The section reads like only US 395 and small portions of two county roads would be used for access. Is this correct for all elements of project construction, including staging areas, and materials storage areas?	These are the main access routes, yes. Detailed construction routes have not yet been planned. Will provide information.
164	5.17 Transportation	5.17.1.2	This table does not describe LOS along Standish Buntingville Road, Cummings Road, or any other access roads that do not contain running line. The PEA Guidelines require a map to accompany this table, especially since there is no corresponding technical study.	Confirmed that existing LOS data is unavailable for County roads, as noted in the PEA. Furthermore, LOS is no longer required, per SB 743 conversion to VMT. The LOS information provided in the PEA is for informational purposes only. The analysis included in the PEA relies on construction-phase VMT analysis for a non-capacity-generating project, as is appropriate.
165	5.17 Transportation	5.17.1.3	This section generally describes transit facilities in the affected counties. The presence or absence of transit facilities along Standish Buntingville Road, Cummings Road, or any other access roads to staging areas/materials storage areas is not included. The PEA Guidelines require a description and map of transit services within 0.5 mile of project features (not just the running line). If there are transit services, a description of the frequency of transit services is required.	Due to the temporary and quick-moving nature of construction activities, and the rural location of the construction area, no transit facilities are proposed to be impacted by construction activities. Thus, no mapping or description of these services is necessary.

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Comment Number	Resource	Section	Comment	Response
166	5.17 Transportation	5.17.1.4	This section generally describes bicycle facilities in the affected counties. The presence or absence of transit facilities along Standish Buntingville Road, Cummings Road, or any other access roads to staging areas/materials storage areas is not included. The PEA Guidelines require a description and map of bicycle facilities within 1,000 feet of project features (not just the running line).	Due to the temporary and quick-moving nature of construction activities, and the rural location of the construction area, no bicycle or pedestrian facilities are proposed to be impacted by construction activities. Thus, no mapping or description of these services is necessary.
167	5.17 Transportation	5.17.1.5	This section has some cut/paste text regarding bicycle facilities. It generally describes pedestrian facilities in the affected counties. The presence or absence of pedestrian facilities along Standish Buntingville Road, Cummings Road, or any other access roads to staging areas/materials storage areas is not included.	Due to the temporary and quick-moving nature of construction activities, and the rural location of the construction area, no bicycle or pedestrian facilities are proposed to be impacted by construction activities. Thus, no mapping or description of these services is necessary.
168	5.17 Transportation	5.17.1.6	Provide VMT for the non-highway portions of the project (Standish Buntingville Road, Cummings Road, and any other access roads to staging areas/materials storage areas)	Construction-only traffic impacts and non-capacity inducing projects do not require VMT analysis, per OPR Technical Advisory Guidelines
169	5.17 Transportation	5.17.2.3	Provide encroachment permit information for the counties, as applicable, similar to the information provided for the Caltrans process.	Will address in comment response
170	5.17 Transportation	5.17.2.4	Provide updated VMT guidance information. Does Lassen County have VMT Guidance regarding the County roads within the alignment?	Construction-only traffic impacts and non-capacity inducing projects do not require VMT analysis, per OPR Technical Advisory Guidelines
171	5.17 Transportation	5.17.4	It is difficult to tell if all of the segments of road containing the project, and all of the access roads to be used for construction, are included in this table. Please supply a map. See comments on Affected Environment.	No new access roads will be built as part of the project. Routes to construction areas have yet to be determined. Primary construction access routes will be clarified in revised Project Description.
172	5.17 Transportation	5.17.4	Question b: the VMT analysis is not to the standard required by the PEA Guidelines. Please provide the information required in Section 5.17.4.2 of the PEA Guidelines (Page 69). Also provide VMT analysis in compliance with Caltrans and Lassen County.	Construction-only traffic impacts and non-capacity inducing projects do not require VMT analysis, per OPR Technical Advisory Guidelines
173	5.17 Transportation	5.17.4	Question c: Be more specific on the lane closures and guidelines for traffic control. Does Lassen County have guidelines for traffic control along the County roads affected by the project?	Applicant does not object to the inclusion of performance standards that the traffic management plan must meet to ensure that there will be no significant impact.
174	5.18 Tribal Cultural Resources	5.18.1.1	The PEA correctly acknowledged that the responsibility to consult with tribes under AB 52 will be the responsibility of CPUC. The text and table in Attachment E indicate that the applicant carried out some informal consultation, but did not provide any documentation other than the results of the NAHC Sacred Lands File Search. While that informal consultation would not replace AB 52, it would be helpful to see the associated documentation, as it may assist CPUC in carrying out a more effective consultation process.	Zayo will provide notes concerning tribal coordination topics at their discretion.

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Comment Number	Resource	Section	Comment	Response
175	5.18 Tribal Cultural Resources	5.18.3, .4, .5	The PEA correctly noted that the impact questions cannot be answered until AB 52 consultation is complete. The draft environmental measures may or may not be appropriate, depending on the outcome of tribal consultation. CPUC considers these to be suggestions for discussion purposes only at this time.	Noted
176	5.18 Tribal Cultural Resources	5.18.5	APM TCR-2 prescribes an ethnographic study on TCRs; however, the PEA Guidelines require an ethnographic study upon application (not as mitigation). The ethnographic background and context is briefly summarized in Section 5.18.1.3 of the PEA; however, this does not constitute a full ethnographic study. Please clarify whether or not an ethnographer will be providing a full ethnography as part of the technical documentation being prepared.	Separate ethnographic study is available and will be submitted as part of the Cultural Report
177	5.19 Utilities and Service Systems	5.19.1	This section provides no mapping of existing Utilities spanning, crossing or adjacent the proposed project; reference is made to existing and planned utility projects located within the US 395 ROW in Table 7.7-1 (Cumulative Projects), but projects listed in this table are all identified as in the Plannin Phase. Existing major utility lines and utility infrastructure in the vicinity of the Project should be mapped in Section 5.19.1	Data is not available. No utilities will be rerouted or impacted by construction activities. Accordingly, this information is not necessary for the analysis of potential project impacts.
178	5.19 Utilities and Service Systems	5.19.3	The source estimate for 18,000 gpd daily water use for dust control, clean-up, soil compaction, and fire response is not identified in this section; a table is needed to indicate how this estimate was derived. Apart from the statement that the Project would purchase water from water suppliers with adequate capacity, there is no data or assurance showing that such supplies will be available to the Project during normal, dry, and multiple dry years (particularly with the expanding threat of prolonged wildfires in northern California). Consideration should be given to an APM for Water Supplies, providing assurance of such supplies in advance of construction.	Will provide the methods for arriving at this estimate. Additional information on water supply forthcoming.
179	5.19 Utilities and Service Systems		Re: Liquid waste disposal from bentonite drilling fluid discharges. An estimate of number of locations (or estimated number per mile), volume of discharges and permit requirements is needed. References should be made to Section 5.10 Hydrology and Water Quality, APM Hydro-1 SWPPP Requirement, and measures to control any unanticipated discharges.	Will clarify in revised Project Description
180	5.19 Utilities and Service Systems	5.19.5	Utility Company Coordination. Consideration should be given to extending the advance notification to utility companies for locating and marking existing underground utilities beyond the indicated 14 days (e.g., 30 days).	Handled as part of preconstruction best practices. Applicant has no objection to including the requirement in the CEQA document.

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Comment Number	Resource	Section	Comment	Response
181	5.20 Wildfire	5.20.1.2	The PEA Guidelines request detailed information for large fires within the project vicinity over the last 10 years. This section summarizes county-wide information over the last 8 years.	Response is under discussion and will be provided at a later date.
182	5.20 Wildfire	5.20.1.3	The discussion on why the Project doesn't require detailed fire modeling is too brief and does not provide substantial evidence. There is the potential for fire risk during construction and surrounding the above-ground facilities. According to the biological resources section of the PEA, there are vegetation communities present that would be within the construction footprint and potentially within the footprint of ILAs and storage yards. Maps and tables should be used to show the vegetation communities and potential fire risk in those locations.	Response is under discussion and will be provided at a later date.
183	5.20 Wildfire	5.20.1.4	Please provide maps of these Values at Risk	Response is under discussion and will be provided at a later date.
184	5.20 Wildfire	5.20.1.5	The section says the wildfire potential varies. What are the areas with the highest potential for fire? What are the vegetation types surrounding the ILAs?	Response is under discussion and will be provided at a later date.
185	5.20 Wildfire	5.20.4	The discussion does not describe the fire risk for the above-ground elements of the system (ILAs).	Will include this information in the revised Project Description
186	5.21 Mandatory Findings of Significance	Question B	The analysis states that the project would have an incremental contribution to cumulative impacts in the project area. Recommend indicating "less than significant impact" on the checklist instead of "no impact"	Applicant does not object to the proposed change being included in the CEQA document. No further information required.
187	5.21 Mandatory Findings of Significance	Question C	The analysis states that the project would have impacts i. Recommend indicating "less than significant impact" on the checklist instead of "no impact"	Applicant does not object to the proposed change being included in the CEQA document. No further information required.
188	6 Comparison of Alternatives	6.1, Alternatives Comparison	Analysis of a reasonable range of alternatives is required in a CEQA document. As proposed, the PEA does not include an analysis of a reasonable range of alternatives. At least one other alternative must be carried forward for full analysis in the CEQA document to be considered adequate. The current proposed alignment could represent Alternative 1, whereas a more refined alignment that (1) further avoids waters of the State, waters of the US, native habitat, special status plant populations, (2) further avoids hazardous waste sites, and (3) that factors in proposed future widening of US 395 could be developed, including proposed directional drilling locations, as the revised Proposed Project alignment.	Alternatives considered and rejected will be provided in narrative format.

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Comment Number	Resource	Section	Comment	Response
189	6 Comparison of Alternatives	6.1 Alternatives Comparison	This section implies that the original project was compared to the "Best Fit Line" and that the Proposed Project was chosen over the original project. However, there is no description of the original project or a comparison table showing the ranking process at work or how the "best fit" was arrived at.	Alternatives considered and rejected will be provided in narrative format.
190	6 Comparison of Alternatives	6.2 Alternatives Ranking	This section repeats that the Best Fit Line is the Project analyzed in this PEA, which is also the environmentally superior alternative. This section states that numerous alternatives were analyzed and ranked and the best fit line emerged as the superior alternative. However, there is no description of any of these alternatives nor a discussion or table showing the ranking process for each alternative.	Alternatives considered and rejected will be provided in narrative format.
191	7 Cumulative Impacts and other CEQA Considerations	General	Please provide more details on how the timing and proposed design for widening of US 395 as well as bike lane improvements affect the Proposed Project alignment and construction timing. Please quantify cumulative impacts on biological resources (i.e., native habitats, wetlands, special status plant populations) associated with the combined projects where possible. Does the widening of US 395 affect the Alternatives Analysis?	Alternatives considered and rejected will be provided in narrative format.
192	7 Cumulative Impacts and other CEQA Considerations	General	Please update the analysis to reflect changes to Section 5	Alternatives considered and rejected will be provided in narrative format.
193	7 Cumulative Impacts and other CEQA Considerations	7.1.1	There is no indication on the list and in the table that Native American jurisdictions were contacted and included in the cumulative analysis.	Will address in comment response
194	7 Cumulative Impacts and other CEQA Considerations	7.1.1	The table indicates the Project Status for all projects in the table is 'Planning Phase' without differentiation between past, present and reasonably foreseeable future projects; additional detail as to projects that are approved, under construction, built, etc. is needed as are anticipated construction schedules where known, date last checked for each individual project and website for each agency or jurisdiction identified.	Will address in comment response
195	7 Cumulative Impacts and other CEQA Considerations	7.1.3	The analysis emphasizes the running line and does not always discuss the ILA facilities, construction footprint, staging areas, and materials storage yards.	The running line is the vast majority of the project footprint and the primary permanent feature. Temporary use of materials storage yards (many of which are preexisting industrial lots) and staging areas (the majority of which are within the Caltrans right-of-way) would not have a cumulative impact. Will clarify in text.
196	7 Cumulative Impacts and other CEQA Considerations	7.1.3	Population and Housing, Land Use and Planning, Public Services, and Minerals are not included in this section	Given that the project will have no impact to these resources, there is no need to include in this section. No further information required.

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Comment Number	Resource	Section	Comment	Response
197	7 Cumulative Impacts and other CEQA Considerations	7.1.3.3, Biological Resources	Please revise this section in conjunction with edits and findings in Section 5.4.	Noted
198	7 Cumulative Impacts and other CEQA Considerations	7.1.3.3, Biological Resources	Recommend deleting this paragraph and starting the section with the second paragraph as the first paragraph is repetitive with the second and the second is more accurate.	Applicant has no objection to proposed changes to be included in the CEQA document. No further information required.
199	7 Cumulative Impacts and other CEQA Considerations	7.1.3	This paragraph dismisses Public Services and Utilities as either having no impact or impacts so minor they would have no contribution to cumulative impacts; no supporting analysis for this conclusion is provided for Public Services in this section, though supporting analysis for the Utilities and Service Systems conclusion is provided in 7.3.13. A separate section for Public Service should be added..	Will update this analysis per your recommendation.
200	7 Cumulative Impacts and other CEQA Considerations		Re: Water Supplies. This section should discuss whether the project's incremental contribution of 18,000 gpd (2.7 million gallons total) is cumulatively considerable.	Will update this analysis per your recommendation.
201	7 Cumulative Impacts and other CEQA Considerations		Recreation. The Shaffer Mountain Trail, Belfast Petroglyphs OHV Trail, Buckhour Backcountry Byway, and California Historic Trail are mentioned in this section but not included in Table 7-1 or identified on any mapping. These trails should be mapped either in Section 5.15, 5.16, or 7.1.	Will include on maps.
202	Appendix A - Project Components	Appendix A - Project Components	See comments on the Mapbook and GIS after the comments on the appendices	Noted
203	Appendix B - Air GHG Energy	Appendix B - Air GHG Energy	no comments	Noted
204	Appendix C BRTR	Appendix C BRTR	See comments on Section 5.4	Noted
205	Appendix A, Figures, of the BRTR	Figures A-2.19, A-2.22, A- 2.77	The BRSA does not appear to match the BRSA in Figures 1- x, 2, or 3-x of Appendix B, Delineation of Potential Waters of the U.S. Report, or the figures in Appendix D, Botanical Resources Report. The study areas should match between all three reports, or an explanation why they do not match should be provided.	Will update text to ensure consistency among reports.

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Comment Number	Resource	Section	Comment	Response
206	Appendix B, Delineation of Potential Waters of the U.S. Report, of the BRTR (date unknown)	General	Please add a date to the report.	Noted and Applicant has no objection to correction being made in CEQA document as appropriate and necessary.
207	Appendix B, Delineation of Potential Waters of the U.S. Report, of the BRTR (date unknown)	General	See comments on Section 5.4, Biological Resources, of the PEA.	Noted
208	Appendix B, Delineation of Potential Waters of the U.S. Report, of the BRTR (date unknown)	General	Per USACE Sacramento District Minimum Standards, the report should include directions to the survey area.	Noted
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
210	Appendix B, Delineation of Potential Waters of the U.S. Report, of the BRTR (date unknown)	Figure 3	The legend should more accurately state "Biological Resources Study Area" rather than "Study Area and ROW" since certain project features are located outside of the right-of-way.	Noted
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.	Response is under discussion and will be provided at a later date.
212	Appendix D, Botanical Resources Report, of the BRTR (dated September 16, 2020)	Executive Summary	The length of the line within California, study area, and description of the study area should match that in the PEA, Appendix D, Delineation of Potential Waters of the U.S. and BRTR. For example, the study area is reported to be 5,538 acres in this report vs. 5,976 acres reported in the Delineation report.	Will address in comment response
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.	Will address in comment response

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Comment Number	Resource	Section	Comment	Response
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.	Will address in comment response
215	Appendix D, Botanical Resources Report, of the BRTR (dated September 16, 2020)	4.1 Vegetation Communities	Please correct - 22 vegetation communities vs. 21.	Will address in comment response
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.	Will address in comment response
217	Appendix D, Botanical Resources Report, of the BRTR (dated September 16, 2020)	Figure 4	Scientific names should be italicized.	Noted and Applicant has no objection to correction being made in CEQA document as appropriate and necessary.
218	Appendix D Cultural Resources	Appendix D Cultural Resources	This study is missing from the PEA	Pending BLM submittal of cultural report to ECorp
219	Appendix I Paleontology	1.2	We see that the excavations for vaults will be 15' x 3' with an unspecified depth. Please provide depth information to determine what geologic features will be affected.	Will address in comment response
220	Appendix I Paleontology	1.2	With vaults spaced 3,500 feet apart, that would be approximately 291 vaults. Please confirm.	Will address in comment response
221	Appendix I Paleontology	3.4	Mention SVP 2010 guidelines under professional guidelines	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
222	Appendix I Paleontology	4.1	Specify that no records search was done, and no pedestrian survey was done	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
223	Appendix I Paleontology	5.2.2	SVP guidelines misquoted. They state Significant Paleontological Resources (p. 11): "Significant paleontological resources are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils . . . Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years)." This contradicts what the constraints study says that the guidelines say.	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
224	Appendix I Paleontology	5.2.3	SVP guidelines misquoted	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
225	Appendix I Paleontology	5.2.4	replace "ray-finned fish' with"catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.

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Comment Number	Resource	Section	Comment	Response
226	Appendix I Paleontology	5.2.5	replace "ray-finned fish" with "catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
227	Appendix I Paleontology	5.2.5	replace "ray-finned fish" with "catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
228	Appendix I Paleontology	5.2.6	replace "ray-finned fish" with "catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
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.	Will clarify.
230	Appendix I Paleontology	table 3	replace "ray-finned fish" with "catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
231	Appendix I Paleontology	table 3	replace "ray-finned fish" with "catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
232	Appendix I Paleontology	table 3	replace "ray-finned fish" with "catostomid fish"	Applicant has no objection of inclusion of this information in CEQA analysis. No further information required.
233	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; a	vaults are missing	Vault locations were unavailable at the time of report preparation. All vaults occur within the running line disturbance footprint, and were therefore adequately captured in the impact analysis.
234	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; b	per project description non removed or modified	Noted
235	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; c	ROW provided, per project description only existing ROW used for project	Noted
236	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; d	no work areas on map	Will address in comment response
237	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; e	no access roads on map	No new access roads will be built as part of the project. Routes to construction areas have yet to be determined. Access routes are not necessary to undertake an adequate CEQA analysis.
238	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; f	staging and laydown area identified, but no other work areas.	Will address in comment response

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Comment Number	Resource	Section	Comment	Response
239	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; g	boring locations not identified	Not available at the time of report preparation. Will address in comment response.
240	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; h	No vegetation removal identified on map or GIS. Per description non-extensive veg removal except at ILA sites	Vegetation removal will primarily be conducted at ILA locations. It is not practical to provide locations of other, very minimal vegetation removal for the entire alignment. Such information is not necessary to analyze potential impacts given the minimal nature. If necessary, a condition can be included to ensure that no significant vegetation removal occurs outside the ILA sites.
241	PEA Guidelines Mapbook and GIS Requirements	3.12.2 Mapbook; i	No grading identified, per project description only grading at ILA sites	Grading will primarily take place at ILA locations. It is not practical to provide locations of other, minor areas of grading for the entire alignment. Such information is not necessary to analyze potential impacts given the limited areas at issue. If necessary, a condition could be added regarding the maximum disturbance areas to ensure no significant impact.
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
243	PEA Guidelines Mapbook and GIS Requirements	3.12.4 GIS Requirements a	NA - no poles	Noted
244	PEA Guidelines Mapbook and GIS Requirements	3.12.4 GIS Requirements b	NA - no poles	Noted
245	PEA Guidelines Mapbook and GIS Requirements	comment	project description refers to vaults along the alignment. These are not in maps or GIS.	Will address in comment response
246	Attachment 1 GIS Data Requirements	Section 1 a-d	No metadata provided in GIS files	Will address in comment response
247	Attachment 1 GIS Data Requirements	Section 2	See 3.12.2 for missing data.	Will address in comment response
248	Attachment 1 GIS Data Requirements	Section 3a	missing work areas, vault locations, mile posts	Will address in comment response
249	Attachment 1 GIS Data Requirements	Section 3b	ADI identified, but no permanent or temporary impacts other than staging areas and ILA sites; boring locations not identified	Will address in comment response
250	Attachment 1 GIS Data Requirements	Section 3C	see chapter 5 notes below	Noted
251	Additional Sections with GIS Requirements	5.17.1.2 - Existing Roadways and Circulation	missing GIS data	Appendix A project overview figures provide a level of data appropriate to this type of project

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Comment Number	Resource	Section	Comment	Response
252	Additional Sections with GIS Requirements	5.5.1.3 - Cultural Resource Survey Boundaries	missing GIS data	Will address in comment response
253	Additional Sections with GIS Requirements	5.7.1.2 - Seismic Hazards	missing GIS data	Will address in comment response.
254	Additional Sections with GIS Requirements	5.7.1.3 - Geologic Units	missing GIS data	Will address in comment response.
255	Additional Sections with GIS Requirements	5.7.1.4 - Soils	missing GIS data	Will address in comment response.
256	Additional Sections with GIS Requirements	5.7.1.5 - Paleontological Resources	missing GIS data	Will address in comment response.
257	Additional Sections with GIS Requirements	5.13.1.1 - Sensitive Receptors	missing GIS data	Will address in comment response.
258	Additional Sections with GIS Requirements	5.16.1.1 - Recreational Facilities	missing GIS data	Recreational facilities are included on the maps for Public Services. Will clarify in the text.
259	Additional Sections with GIS Requirements	5.17.1.2 - Existing Roadways and Circulation	missing GIS data	Appendix A project overview figures provide a level of data appropriate to this type of project
260	Additional Sections with GIS Requirements	5.17.1.3 - Transit and Rail Facilities	missing GIS data	Will address in comment response.
261	Additional Sections with GIS Requirements	5.17.1.4 - Bicycle Facilities	missing GIS data	Due to the temporary and quick-moving nature of construction activities, and the rural location of the construction area, no bicycle or pedestrian facilities are proposed to be impacted by construction activities. Thus, no mapping of these services is necessary.
262	Additional Sections with GIS Requirements	5.17.1.5 - Pedestrian Facilities	missing GIS data	Due to the temporary and quick-moving nature of construction activities, and the rural location of the construction area, no bicycle or pedestrian facilities are proposed to be impacted by construction activities. Thus, no mapping of these services is necessary.
263	Additional Sections with GIS Requirements	5.19.1.2 - Utility Lines	missing GIS data	Data is not available. No utilities will be rerouted or impacted by construction activities.
264	Additional Sections with GIS Requirements	5.20.1.1 - Wildfire	missing GIS data unless not applicable	Response is under discussion and will be provided at a later date.
265	Additional Sections with GIS Requirements	5.20.1.2 - Wildfire	missing GIS data unless not applicable	Response is under discussion and will be provided at a later date.
266	Additional Sections with GIS Requirements	5.20.1.3 - Wildfire	vegetation GIS provided, but not fuels	Response is under discussion and will be provided at a later date.
267	Additional Sections with GIS Requirements	7.1.1 - Cumulative Impacts	missing GIS data	Will address in comment response.
268	BTR Minimum Requirements; Mapping and GIS Data	a) Biological survey area for each survey that was conducted	missing GIS	Will address in comment response

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Comment Number	Resource	Section	Comment	Response
269	BTR Minimum Requirements; Mapping and GIS Data	b) Vegetation communities and land cover types	Yes, GIS data provided	Noted
270	BTR Minimum Requirements; Mapping and GIS Data	c) Aquatic resource delineation	Yes, GIS data provided	Noted
271	BTR Minimum Requirements; Mapping and GIS Data	d) Special-status plant locations	Yes, GIS data provided	Noted
272	BTR Minimum Requirements; Mapping and GIS Data	e) Special-status wildlife locations	only raptor nests	Noted
273	BTR Minimum Requirements; Mapping and GIS Data	f) Avian point count locations	missing GIS	N/A
274	BTR Minimum Requirements; Mapping and GIS Data	g) Critical habitat	Not applicable; critical habitat not present within the study area.	Noted
275	BTR Minimum Requirements; Mapping and GIS Data	h) California Coastal	Not applicable; project not in the coastal zone.	Noted