

STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Edmund G. Brown Jr., Governor



November 1, 2016

SENT BY EMAIL

Gail Long
Manager, State Government Affairs
TDS Telecom
PO Box 1004
Redmond, OR 97756
Email: Gail.long@tdstelecom.com

RE: Review of TDS Telecom PEA for the Olinda Last Mile Underserved Broadband Project in Shasta County, California Pursuant to Commission Resolution T-17411.

Dear Ms. Long,

The California Public Utilities Commission's (CPUC's) Infrastructure Permitting and California Environmental Quality Act (CEQA) section has completed its first review of TDS Telecom's Proponent's Environmental Assessment (PEA) for the Olinda Last Mile Underserved Broadband Project, required pursuant CPUC Resolution T-17411. The CPUC's Information and Criteria List and PEA Checklist were used as basic guides for determining PEA adequacy. Deficiencies in data are those that would prevent preparation of an adequate CEQA document in a timely manner.

The information contained in the PEA for the proposed Olinda Last Mile Underserved Broadband Project is currently incomplete. Attachment A identifies information required to deem TDS Telecom's application and PEA complete and to proceed with preparation of the CEQA document. Responses to each item should be provided by December 1, 2016. Please send one set of responses to my attention and one set to Silvia Yáñez at Ecology and Environment, Inc. (except as indicated in the table), in hardcopy and electronic formats.

Upon receipt of the supplemental information, the CPUC will perform a second review to assess PEA adequacy and issue a completeness determination. The CPUC reserves the right to ask for additional information in the form of data requests at any point in the process. Please direct questions on the completeness review to Jensen Uchida at (415) 703-5484 or via email to Jensen.Uchida@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jensen Uchida".

Jensen Uchida
Project Manager, Infrastructure Permitting and CEQA

CC: Mary Jo Borak, Supervisor, Infrastructure Permitting and CEQA, CPUC
Jack Mulligan, Attorney, CPUC
Xiao Selena Huang, Broadband, Policy, and Analysis Branch, CPUC
Silvia Yáñez, Project Manager, Ecology & Environment, Inc.

Attachment A: Deficiencies in the Proponent's Environmental Assessment

Attachment A: PEA Completeness Review

Deficiencies in TDS Telecom’s Proponents Environmental Assessment (PEA) are described in detail in the table below. The California Public Utilities Commission’s PEA Checklist (November 2008) and CPUC Information and Criteria List (July 2008) were used to identify the deficiencies in TDS Telecom’s PEA.

TDS Telecom Olinda Last Mile Underserved Broadband Project PEA Deficiencies			
<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
Project Description			
1	PEA Section 3.1, PEA Appendix A	PEA Checklist sections 3.4, 3.7.1.1, 3.7.1.2, 3.7.1.3, 3.7.1.5, 3.7.1.7; section V(11) of the Information and Criteria List	<p>Provide project GIS (or equivalent) data layers.</p> <p>The provided project maps are required in GIS format. Additional layers are needed to complete PEA review. Provide layers, as applicable, for:</p> <ul style="list-style-type: none"> • Proposed route alignment and communication nodes; • Proposed HDD boring locations; • Staging areas, if applicable; • Soil stockpile area(s); • Work areas; • Access roads and/or spur roads to be used for construction (identified by type); • Areas of potential vegetation removal; • Areas of Cleanup and Post-Construction Restoration; • Project relative location with Bureau of Land Management (BLM) land.
2	PEA Section 3.6 Construction; Pages: 5-7	PEA Checklist section 3.7.3.1; section V(11) of the Information and Criteria List	<p>Confirm that cable installation will not require asphalt/pavement removal.</p> <p>Confirm whether pavement cutting or removal will be necessary in areas with limited road shoulder space.</p>
3	PEA Section 3.6 Construction Pages: 5-7	PEA Checklist section 3.7.1.1; section V(11) of the Information and Criteria List	<p>Clarify whether staging areas will be used for the project.</p> <p>Section 3.6 states that no staging areas will be required and only describes areas that will have ground disturbance as part of the project. However, several APMs, including: APM HAZ-2, GEO-2, and GEO-6 imply that staging and stockpiling will occur, and the PEA states that</p>

TDS Telecom Olinda Last Mile Underserved Broadband Project PEA Deficiencies			
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			staging would take place at Central Offices or at individual contractors' off-site yards. Clarify whether any other work areas would be required (e.g. areas for parking vehicles, space to prep for ground disturbance/excavation, area to temporarily place excavated material during node installation, etc.) and identify potential locations where staging of construction materials, equipment, and excavated spoils would be placed during construction.
4	PEA Section 3.6.4	PEA Checklist sections 3.7.1.2 and 3.7.1.7;; section V(11) of the Information and Criteria List	<p>Describe how vegetation will be restored in disturbed areas.</p> <p>PEA section 3.6.4 states that “surface restoration would involve returning the surface contours of disturbed areas to their pre-construction condition.” State whether vegetation would be removed for trenching, plowing, or boring. Clarify whether and how vegetation will be replaced or restored in areas where vegetation has been removed during trenching or plowing.</p>
5	PEA Section 3.6 Construction; Pages: 5-7	PEA Checklist section 3.7.2.3; section V(11) of the Information and Criteria List	<p>Provide more details about node and conduit installation.</p> <p>Provide the following information:</p> <ul style="list-style-type: none"> • Dimensions of the epoxy composite vault and describe how it will be buried. • Estimated amount of fill material that will remain after placement of the vault. If any excess material is anticipated, describe how it will be disposed of/removed from the site. • State whether any material, such as aggregate, will need to be imported to bury nodes and conduits. • Estimate of total ground disturbance for node installation. • Photograph or schematic of a typical communications node.
6	PEA Section 3.6.6 Construction Schedule Page: 8	PEA Checklist section 3.7.6; section V(11) of the Information and Criteria List	<p>Provide project schedule by component.</p> <p>Estimated total construction time is given as 2 months but estimates for individual project components are not given. Provide the estimated duration of specific project activities including: site preparation, plowed and trenched installation, directional bore installation, node installation, and cleanup and surface restoration. Specify how many feet of conduit would be laid per day.</p>
Air Quality			
7	PEA Section 4.15, page(s) 98	PEA Checklist section 5.3; section V (12) of the Information and Criteria List	<p>Provide the location and types of sensitive receptors that could be impacted by the project.</p> <p>Provide a detailed list and GIS layer (or equivalent) that identifies location and types of sensitive receptors (e.g., schools, hospitals, and residences) located within 1,000 feet of the</p>

TDS Telecom Olinda Last Mile Underserved Broadband Project PEA Deficiencies			
No.	Reference	CPUC Requirement	Description of Deficiency
			project proposed route, work areas, staging areas, and/or soil stockpiling areas.
8	PEA Section 4.15, page(s) 98; PEA Appendix B	PEA Checklist section 5.3; section V (12) of the Information and Criteria List	<p>Confirm estimate of daily trips (vehicle and trucks) generated by the project.</p> <p>Appendix B of the PEA provides assumptions on trips used for the Air Quality analysis. Based on the Trips and VMT table in Appendix B, it appears the maximum number of daily trips would occur during bored conduit installation and would consist of 8 off-road equipment round trips, 8 worker round trips and 4 vendor round trips. Confirm if the maximum number of daily trips during construction would be 20 round trips, or provide clarification regarding the number of daily trips per type of vehicle.</p>
Biological Resources			
9	PEA Section 4.4.1.2, page(s) 30	PEA Checklist section 5.4; section V(12) of the Information and Criteria List	<p>Provide GIS data for the biological resources study area.</p> <p>Provide a GIS file delineating the area studied during reconnaissance-level biological surveys.</p>
10	PEA Section 4.4.1.3, Page 33	PEA Checklist section 5.4; section V(12) of the Information and Criteria List	<p>Provide invasive species GIS data.</p> <p>Table 4.7 provides the locations of invasive species in the Study Area. If invasive species were mapped using GPS while performing biological surveys, provide GIS data.</p>
11	PEA Section 4.4.2.2, Page 35	PEA Checklist section 5.4; section V(12) of the Information and Criteria List	<p>Clarify APM BIO-1.</p> <p>APM BIO-1 states that “all waterways and wetlands in the project area will be bored beneath and avoided during construction.” Clarify how far below these features, or at what depth, boring would take place.</p>
12	PEA Appendix C, page 9	PEA Checklist section 5.4; section V(12) of the Information and Criteria List	<p>Describe survey methodology for big-scale balsamroot.</p> <p>Provide a description of the methodology and/or survey report and GIS data for the survey completed on May 20, 2015 for big-scale balsamroot.</p>
Cultural Resources			
13	PEA Section 4.5.1.2	PEA Checklist section 5.5; section 12 (V.b, V.b, XVII.a) of the Information and	<p>Provide documentation of consultation with the 14 Native American individuals or organizations identified by the Native American Heritage Commission.</p> <p>Provide documentation that the Applicant has consulted with the 14 Native American</p>

TDS Telecom Olinda Last Mile Underserved Broadband Project PEA Deficiencies			
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		Criteria List	individuals or organizations, identified by the Native American Heritage Commission, who may have knowledge of cultural resources or tribal cultural resources in the project area. Documentation includes any letters sent to those on the contact list, follow up records, phone notes, and responses from the individuals or organizations.
14	PEA Section 4.5.2.2	PEA Checklist section 5.5; section 12 (V.a) of the Information and Criteria List	<p>Provide documentation for the pending California State Historic Preservation Office’s concurrence for recommended “No Adverse Effect” finding.</p> <p>Provide documentation of response received from the California State Historic Preservation Office’s on a recommended “No Adverse Effect” finding for the Happy Valley Ditch, as discussed in Impact CR-1 of the PEA.</p>
15	PEA Appendix E	PEA Checklist section 5.5; section 12 (V.a, V.b, and V.d) of the Information and Criteria List	<p>Provide copy of confidential Class I Research conducted for the Class III Cultural Resources Survey.</p> <p>Provide documentation of the confidential Class I Research that was conducted for the Class III Cultural Resources Survey. Specifically, provide Appendix A of the Class III Cultural Resources Survey Report (this report is included in Appendix E of the PEA), marked as confidential. Send a copy of Appendix A of the Class III Cultural Resources Survey Report to the following contact and address:</p> <p><i>Natasha Snyder, Chief Cultural Resources Specialist</i> Ecology and Environment, Inc, 368 Pleasantview Drive, Lancaster, New York 14086 Phone: 716-684-8060</p>
16	PEA Appendix E	PEA Checklist section 5.5; section 12 (V.a, V.b, and V.d) of the Information and Criteria List	<p>Provide copy of California Office of Historic Preservation Forms obtained for the Class III Cultural Resources Survey.</p> <p>Provide copies of the California Office of Historic Preservation (CA OHP) Forms obtained for the Class III Cultural Resources Survey. Specifically, provide Appendix B of the Class III Cultural Resources Survey Report (this report is included in Appendix E of the PEA), marked as confidential. Send a copy of Appendix B of the Class III Cultural Resources Survey Report to the following contact and address:</p> <p><i>Natasha Snyder, Chief Cultural Resources Specialist</i> Ecology and Environment, Inc,</p>

TDS Telecom Olinda Last Mile Underserved Broadband Project PEA Deficiencies			
<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
			368 Pleasantview Drive, Lancaster, New York 14086 Phone: 716-684-8060
Hydrology and Water Quality			
17	PEA Section 4.4.1.2, page(s) 30	PEA Checklist section 5.4; section V(12) of the Information and Criteria List	Provide waterway and wetland delineation data. Provide the GIS data collected in the field during field delineations reported in the PEA Section 4. 4 and in Appendix D of the PEA.
Hazards and Hazardous Materials			
18	PEA Section 4.7.2.2 Page: 72	PEA Checklist section 5.7; section V(13) of the Information and Criteria List	Provide estimate of hazardous waste to be generated by the project. Discussion under Impact HAZ-1 describes the use of small quantities of hazardous materials, such as waste oil. Confirm whether directional bore installation or any other activities would generate any additional type of hazardous waste. Provide the estimated quantity and type of hazardous waste to be generated by the project.
19	PEA Section 4.7.2.2 Page: 72	PEA Checklist section 5.15; section V(13) of the Information and Criteria List	Provide more details about road control and lane closures. Discussion under Impact HAZ-6 describes that road control would be set up for each day and that one lane of traffic may need to be closed during work activities. Delays to motorists are estimated at 1 to 2 minutes. Specify the length of road would be closed during daily construction activity. Specify where lane closures would result in only one lane of traffic open for traffic in both directions.
Land Use			
20	PEA Appendix A	PEA Checklist Section 5.9; section V(12) of the Information and Criteria List PEA Checklist Chapter 7; section V.15 of the Information and Criteria List	Provide land owner information. Provide GIS data and Excel spreadsheet identifying all parcels within 300 feet of the project components with the following data: <ul style="list-style-type: none"> • APN number, mailing address, and parcel’s physical address. • Zoning designations for all parcels within 300 feet of the project component.

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<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
Utilities and Service Systems			
21	PEA Section 4.13.2, page 94	Sections V 11.b and V-13 of the Information and Criteria List	<p>Identify potential providers of water for the project.</p> <p>Impact PSU-5 indicates that water needed for dust suppression would be provided to the project contractor by local municipal water sources, such as those found in Anderson, Happy Valley, or Igo. Specify which of the three local sources would be likely used for the project, if known.</p>