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**Date:** December 22, 2011

**To:** California Public Utilities Commission (CPUC)

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**From:** RMT, Inc.

**Project:** State Route 35 Fiber-Fed Distributed Antenna System Project

**Subject:** Response to comments received on the Draft IS/MND

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## **Introduction**

Three comment letters were received on the Draft Initial Study (IS) and Mitigated Negative Declaration (MND) during the public review period. The three comment letters are attached to this memorandum. The comments and responses to the comments are addressed in this memorandum. Any changes to the Draft IS/MND resulting from text revisions from consideration of comments have been included in the revised IS/MND and are shown in ~~striketrough~~ and underline within the revised document.

The edits made in response to comments do not trigger the need for recirculation of the IS/MND per CEQA Guidelines Section 15073.5. No new avoidable significant effects were identified and no new mitigation measures to address new avoidable effects were added. Minor edits to mitigation measures have been made; however, the edits were made to provide further clarification and to improve the effectiveness of the measures. No mitigation measures were replaced or deleted. In accordance with CEQA Guidelines Section 15074.1, none of the changes made to the IS/MND require recirculation of the IS/MND.

## Comment Discussion

Three comment letters were received on the proposed project from the following agencies:

- County of San Mateo Planning & Building Department
- Mid-Peninsula Regional Open Space District (MROSD)
- California Department of Transportation (Caltrans)

These comments have been summarized with responses.

## COUNTY OF SAN MATEO PLANNING & BUILDING DEPARTMENT

### Summary of Comments

1. In order for the IS questions 3.1.2(a) through (d) to be answered under the “Less than Significant” category, two critical pieces of information are required but are missing:
  - a. While a site plan is included in the Draft IS/MND that shows all existing and new poles along the project route, there are no elevation drawings showing what the poles and associated communications equipment would look like.
  - b. Photos of a typical stretch of the project route showing existing conditions, and photosimulations showing the various project elements, are not included in the Draft IS/MND.
2. The Draft IS/MND states that the impacts to Skeggs Point Scenic Vista would be significant without mitigation. Two mitigation measures are included that relate to construction, which have no long term ability to mitigate the project’s visual impact, while the third measure only requires the antenna array on the node to be positioned in a circle close to the utility pole.

### Responses

1. The analysis in Section 3.1 was based on both the elevation data and the photosimulations. These documents are available on the CPUC website at:
  - <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.These drawings and photosimulations were made available during the 30-day public review period for the Draft IS/MND. The analysis was based on the drawings and photosimulations. An explanation and description of the new elements as they would appear in the existing corridor is provided on page 3.1-10 of the Draft IS/MND. Based on the analysis, the impacts would be less than significant.
2. The analysis was based on the elevation data and visual simulations that were provided during the public review period. The comment is noted regarding the effectiveness of the measures presented to mitigate the operational impacts to Skeggs Point. Mitigation measures Aesthetics 1 and Aesthetics 2 should be moved to follow immediately after Applicant Proposed Measure (APM) Aesthetics 1, prior to the discussion of Operations and Maintenance impacts, as these two mitigation measures address visual impacts during project construction. Revisions have also been made to the text to clarify that the project would not have significant impacts on the vista, but rather on the views of the forest backdrop while exiting the vista due to the equipment on the pole. Revisions have been made to the text to more clearly specify the potential impact that is mitigated by reconfiguring the equipment on Node #8 under Mitigation Measure Aesthetics-3. In addition, the description of Node #8 under mitigation measure Aesthetics 3 on page 3.1-9 of the Draft

IS/MND incorrectly indicates that the equipment would encircle the pole, when the measure was intended to require that the antennas at Node #8 be flush mounted to the pole.

The revised text on pages 3.1-7 through 3.1-9 now reads as follows:

**Construction.** Construction activities would be visible throughout the immediate project area. Construction activities would take place between 7:00 AM and 6:00 PM on weekdays and between 9:00 AM and 5:00 PM on Saturdays, and would be of a short duration of 1 to 2 days at any one trenching or node location. Noticeable activities would include:

- Work crews accessing the project area
- Pruning of existing vegetation
- Presence of a rubber-tired backhoe with auger and a small crane for constructing new communication node poles
- Trenching and boring equipment for construction of buried conduit sections
- Bucket trucks for installing new aerial cable
- Trucks and other miscellaneous equipment

Only one scenic vista is located along the project alignment. Skeggs Point is a parking area with a scenic vista. Views of construction would be short-term (1 to 2 days). Implementation of APM Aesthetics-1 would ensure that construction impacts on scenic vistas remain at a less than significant level.

**APM Aesthetics-1.** The Skeggs Point parking area will not be utilized for staging of equipment, nor would access to the area be blocked during installation of project components.

**Mitigation Measure Aesthetics-1.** To maintain the visual integrity of the Skeggs Point scenic vista area, all equipment associated with construction of Node #8 shall be removed from the site daily.

**Mitigation Measure Aesthetics-2.** All construction activities associated with Node #8 shall occur during weekdays with no construction activities occurring during weekends or holidays.

**Operation and Maintenance.** The Skeggs Point scenic vista includes a one-way (south to north) vehicular circulation pattern. Existing utility poles are located on either side of the vista point entrance and exit. Because of the curved alignment of SR 35 at Skeggs Point, the existing electric circuits and other utility lines between the two poles are positioned immediately overhead of the highway and not within the vista area. The 57-foot-tall Node #8 pole and associated features would be located adjacent to the exit of the scenic vista point. The pole and communication facilities would be vivid from the scenic vista point as seen against its forest backdrop, as the proposed pole would be taller than adjacent existing utility poles, include a cross member near its top, and be positioned in open view immediately adjacent to the exit drive. ~~While the~~ The positioning of Node #8 communication facilities would be at the side of the vista point area and would not block or disrupt views from the vista point. ~~the impact to the scenic vista would be moderate. Without mitigation this~~ Impacts to views leaving the vista on the backdrop of the forest could be considered significant due to the appearance of the cross member and equipment on the pole. Implementation of mitigation measures ~~Aesthetics 1 through Aesthetics-3 would ensure the unity and integrity of the scenic vista point and reduce~~

the ~~scenic vista~~ visual impact of the Node #8 facilities on views of the surrounding forest to a less than significant level.

~~**Mitigation Measure Aesthetics-1.** To maintain the visual integrity of the Skeggs Point scenic vista area, all equipment associated with construction of Node #8 shall be removed from the site daily.~~

~~**Mitigation Measure Aesthetics-2.** All construction activities associated with Node #8 shall occur during weekdays with no construction activities occurring during weekends or holidays.~~

**Mitigation Measure Aesthetics-3.** The antenna array on Node #8 shall be ~~positioned in a circle~~ close flush mounted to the utility pole to conform to the design of other communication nodes that are part of the project.

## MIDPENINSULA REGIONAL OPEN SPACE DISTRICT (MROSD)

### Summary of Comments

1. The MROSD owns and manages open space land on the San Francisco Bay peninsula with 12,700 acres located immediately adjacent to the proposed project route. The MROSD's mission is to acquire and preserve regional greenbelt open space land to protect and restore the natural environmental and provide ecologically sensitive educational and enjoyment opportunities to the public.
2. Due to limited available parking for the public open space lands owned and managed by MROSD along the project route, visitors to these lands regularly park along the shoulder of State Route (SR) 35 to access these public lands. MROSD is concerned that project construction activities could temporarily impact parking availability along SR 35. MROSD therefore requests that the applicant provide a detailed project construction schedule a minimum of three (3) weeks ahead of any work to allow for sufficient time to notify visitors of temporary parking issues.
3. MROSD also requests that construction activities that could be disruptive to parking along SR 35 only take place on weekdays to avoid impacts to high parking demand on weekends.
4. MROSD requests that any driveways and gate entrances to public open space lands affected by trenching and excavation activities be covered with large metal plates to allow for unobstructed ingress and egress.

### Responses

1. The comment is noted.
2. Parking adequacy was eliminated from the Appendix G CEQA checklist as determined by the Natural Resources agency in 2010 and based in the decision in *San Francisco Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4<sup>th</sup> 656. The court in that case distinguished the social impact of inadequate parking from actual adverse environmental effects. Therefore, parking adequacy is not considered an environmental impact under CEQA and was not addressed directly in the IS. The MROSD's concerns, however, are noted. The concerns can be addressed under the discussion of mitigation to address congestion management as parking issues can lead to congestion. Clarifications have been added to APM Traffic-1 in order to enhance congestion management.

**APM Traffic-1:** A Traffic Management Plan will be submitted to Caltrans and San Mateo County prior to any construction activities. Project traffic control measures contained in

this Traffic Management Plan will conform to the specifications of Caltrans and San Mateo County. The contractors retained for project construction will follow Caltrans' Standard Plan T13 ("Traffic Control System for Lane Closure On Two-Lane Conventional Highways") to manage traffic during the construction of the Project and to ensure that construction activity will not create unsafe traffic conditions. The Traffic Management Plan will include the use of portable warning signs, flaggers, and cones/barricades that will separate the construction activities from traffic. The Plan shall also include a requirement to maintain a detailed project schedule a minimum of ten (10) calendar days ahead of any work that could result in a disruption to traffic, parking, or access to public open space lands. The applicant shall notify visitors and the public a minimum of ten (10) calendar days in advance of such potential disruptions by providing written notice to the MROSD and by posting temporary signage in the vicinity of the proposed construction activities. When possible, the applicant shall strive to provide notice to the MROSD, visitors, and the public three (3) weeks in advance of such construction activities.

3. MROSD's request is noted. No work would occur on Sundays or holidays as stated in Section 2.2.6 Project Schedule on page 2-7 of the Draft IS/MND. However, work could occur on Saturdays. Mitigation Measure Traffic-1 has been modified to accommodate MROSD's request as follows:

**Mitigation Measure Traffic-1:** Lane closures will be limited to non-peak travel periods (between 9 AM and 4 PM on weekdays) to minimize traffic delays on SR 35. Construction activities, including lane closures that could be disruptive to parking along SR 35 shall only take place on weekdays to avoid high parking demand on weekends.

4. MROSD's request is noted. APM Traffic-2 has been clarified to include driveway and gate entrances to public open space lands, as requested by MROSD. APM Traffic-2 now reads as follows:

**APM Traffic-2:** Complete closure of any residential, ~~or~~ commercial, or public open space driveway or gate entrance shall not occur during project construction. If the Project requires work across any driveways or gate entrances during trenching or excavation, large metal plates shall be placed across the trenches or excavated areas in order to allow ingress and egress for local residents, business owners, visitors to public open space lands, and emergency vehicles.

## CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

### Summary of Comments

1. Provide a detailed, scale map showing the right-of-way for SR 35 along the entire length of the project.
2. Provide detailed plans showing all project components within the SR 35 right-of-way.
3. Provide detailed plans showing the locations for all proposed underground conduit.
4. It would be helpful if the Draft IS/MND had one location that clearly identifies the different project segments where new ground would be broken.
5. Provide all design specifications.
6. Provide a copy of the County of San Mateo SR 35 Corridor Protection Plan letter of concurrence for the proposed project.
7. Provide existing photos of the project area.

*Memorandum*

8. Provide conceptual plans and/or photosimulations of proposed project elements.
9. Clearly identify which nodes/poles are existing, while nodes/poles are to be replaced, and which nodes/poles are proposed as new.
10. Provide the dimensions of aboveground hand holes, and indicate whether the hand holes would be visible from SR 35. If the hand holes would be visible, then include vegetative screening.
11. Provide the heights of existing and proposed poles.
12. Include the Henrik Ibsen Park and Hill Open Space Preserve on Figure 3.1-1.
13. In the event of future improvements, including maintenance and repair, to the SR 35 right-of-way wherein the relocation or removal of the fiber optic line and equipment may be required. The applicant will relocate or remove the fiber optic line and equipment at its sole expense in accordance with the Caltrans Encroachment Permit Manual Section 607.4.
14. Caltrans will not be responsible for damage to the fiber optic line, if placed under the asphalt concrete or above existing culverts, during routine or emergency maintenance and repairs.
15. Caltrans requests that the applicant provide an empty conduit for the exclusive use of Caltrans, to be laid at the same time as the applicant's fiber optic conduit.
16. A maintenance agreement with Caltrans will be required.
17. The Draft IS/MND does not discuss the potentially hazardous contamination that sometimes exists within roadway corridors. There is the potential within the project limits for the presence of elevated concentrations of aerially deposited lead (ADL) from historic motor vehicle exhaust. Prior to project construction, ADL testing along the unpaved portions of SR 35 may be necessary to quantify the problem.

Caltrans allows excavated soil to be returned to excavations and their immediate surroundings without any sampling and testing for ADL if the amounts of soil generated are small. However, if a project produces excessive surplus soil due to the volume of infrastructure installed, then the soil will need to be tested for ADL and properly characterized for disposal or possible reuse off site. Any site investigation should also include screening for other contaminants suspected due to past or present conditions identified in the project area, such as pesticide use, hydrocarbons, solvents, and metals.

If ADL testing identifies lead in the project soils, then a lead compliance plan or health and safety plan will need to be developed and implemented during project construction to minimize worker exposure.

18. The cultural resources study and mitigation measures outlined in the Draft IS/MND satisfy the Caltrans requirements for environmental legal compliance for cultural resources within the State Route 35 right-of-way. If a cultural resources discovery occurs within the right-of-way during project construction, then the Caltrans Office of Cultural Resource Studies shall be immediately contacted. A staff archaeologist will evaluate the discovery within one business day after contact. Caltrans requires review of any potential data recovery plans within the State Route 35 right-of-way.
19. Work within the SR 35 right-of-way requires prior approval of an encroachment permit from Caltrans.
20. Provide a copy of the traffic management plan.

## Responses

1. Scaled project plans are available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.
2. Scaled project plans are available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.
3. Scaled project plans are available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.
4. The locations for the three segments of underground conduit installation are shown on Figure 1.1-3, and are discussed on pages 2-2 through 2-4.
5. Scaled project plans are available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>. Trench depth is discussed on page 2-3 of the Draft IS/MND.
6. The County of San Mateo has deferred to Caltrans for review and permitting of the proposed project. To date, the County of San Mateo has not requested that the applicant obtain a SR 35 Corridor Protection Plan letter of concurrence. Should the County of San Mateo determine that such a letter of concurrence is necessary, the applicant will be required to obtain this letter.
7. Photographs showing existing conditions are available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.
8. Photosimulations of the proposed new nodes are available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.
9. The project plans available on the CPUC website indicate the location of existing poles and new poles. No existing poles are proposed to be replaced with new poles, and the reference on the plans to “replacement poles” is a typographical error. The use of replacement poles at some locations was initially considered but ruled out due to coverage issues, inability to use existing poles due to age, size, or lack of climbing space, and other technical reasons. References to “replacement poles” have been deleted from the IS (see Errata).
10. ExteNet anticipates using only underground hand holes for the project. If an unexpected situation is encountered where using an underground hand hole is infeasible, then ExteNet would install an aboveground hand hole with maximum dimensions of 17 inches in height, 30 inches in width, and 24 inches in depth. Vegetative screening would be used to screen any aboveground hand holes. Edits have been made to the project description as indicated in the Errata.
11. Pole heights are provided in the schematic drawings available on the CPUC website at <http://www.cpuc.ca.gov/environment/info/mha/hwy35/hwy35.htm>.
12. A revised Figure 3.1-1 showing the locations of both of these parks has been attached to this memorandum.
13. The comment is noted. The applicant will comply with all requirements of the Caltrans Encroachment Permit Manual.
14. The comment is noted.
15. The comment is noted. ExteNet will install a second, empty conduit for future Caltrans needs at the three locations where its own underground conduit will be installed. This second conduit would be within the disturbance area described in the Draft IS/MND, and would therefore have no additional impacts than those already addressed in the Draft IS/MND. The second, empty conduit

will become the sole property of Caltrans, and Caltrans will be solely responsible for all maintenance, operation, and security for the conduit, as well as for installing any future cable in the conduit and connecting such conduit to other conduit, hand holes, vaults, or other facilities. Edits have been made to the project description as indicated in the Errata.

16. The comment is noted.
17. Comment noted. The amount of earthmoving activities proposed as part of the project is small. All excavated soils would be used to backfill trenches and holes created for the 17 proposed new poles; no excavated soils would be removed from the site. Due to the small scope of the proposed excavation activities and the fact that the soils would be kept on site, no ADL testing is required for these soils.
18. The comment is noted. If a cultural resources discovery occurs within the right-of-way during project construction, then the Caltrans Office of Cultural Resource Studies will be immediately contacted per Caltrans' requirements.
19. The comment is noted. The applicant will comply with all Caltrans requirements, and will obtain an encroachment permit prior to performing any work within the SR 35 right-of-way.
20. A traffic management plan will be required as part of APM Traffic-1, and will be prepared and submitted to Caltrans prior to any construction activities. APM Traffic-1 has been modified for purposes of clarity. Please see the response to the MROSD comment 2 for the revised text for APM Traffic-1.

## Errata

The following clarifications have been made to the IS/MND.

1. The discussion of the proposed new underground conduit on page 2-2 of the Draft IS/MND has been revised as follows to add the second set of conduit requested by Caltrans:

### ***Installation of Conduit***

ExteNet would install approximately 1,187 linear feet (0.23 miles) of PVC conduit to hold fiber-optic cable. This conduit would be installed at three locations in order to connect the proposed nodes 1, 2, and 11 to the fiber-optic backbone of the newly installed communications system. A second set of empty PVC conduit of the same length would be installed adjacent to ExteNet's fiber-optic cable conduit. This second conduit would be for future Caltrans needs. The second, empty conduit would become the sole property of Caltrans, and Caltrans would be solely responsible for all maintenance, operation, and security for the conduit, as well as for installing any future cable in the conduit and connecting such conduit to other conduit, hand holes, vaults, or other facilities.

Installation of conduit would take place within the public rights-of-way of SR 35. Conduit would be installed via a combination of HDB and trenching. Each construction method is described further below.

2. The discussion of hand holes on page 2-4 of the Draft IS/MND has been revised to address above ground hand holes:



### **Installation of Hand Holes**

Fiber-optic junction boxes (hand holes) would be placed at each of the 17 newly installed communications nodes, and at the ends of each of the three underground conduit installation areas. These hand holes would provide locations from which to pull fiber-optic cable into the newly installed conduits, as well as allow access to the cable for repair and maintenance activities. Hand holes would be installed concurrently with the conduit installation component of the project. Vault boxes are often made of polymer concrete, fiber reinforced plastic, or fiberglass. ExteNet anticipates using only underground hand holes for the project. Underground hand holes would measure approximately 17 inches long by 30 inches wide by up to 4 feet deep.

If an unexpected situation is encountered where using an underground hand hole is infeasible, then ExteNet would install an aboveground hand hole. Above ground hand holes will be smaller in size, with maximum dimensions of 17 inches in height, 30 inches in width, and 24 inches in depth. Vegetative screening would be used to screen any aboveground hand holes.

Hand hole vault box installation would involve excavation with a rubber-tired backhoe, placement of the vault box in the excavated area, and backfilling around the vault box. Backfilling would be accomplished by placing excavated material around the vault box with a rubber-tired backhoe and compacting the backfill with a hand-operated vibratory compactor.

3. Figures 3.1-1 and 3.14-1 have been revised to include the MROSD open space lands that were omitted from the original version of these figures.
4. The text on pages 3.1-7 through 3.1-9 has been changed to clarify visual impacts to the Skeggs Point scenic vista.

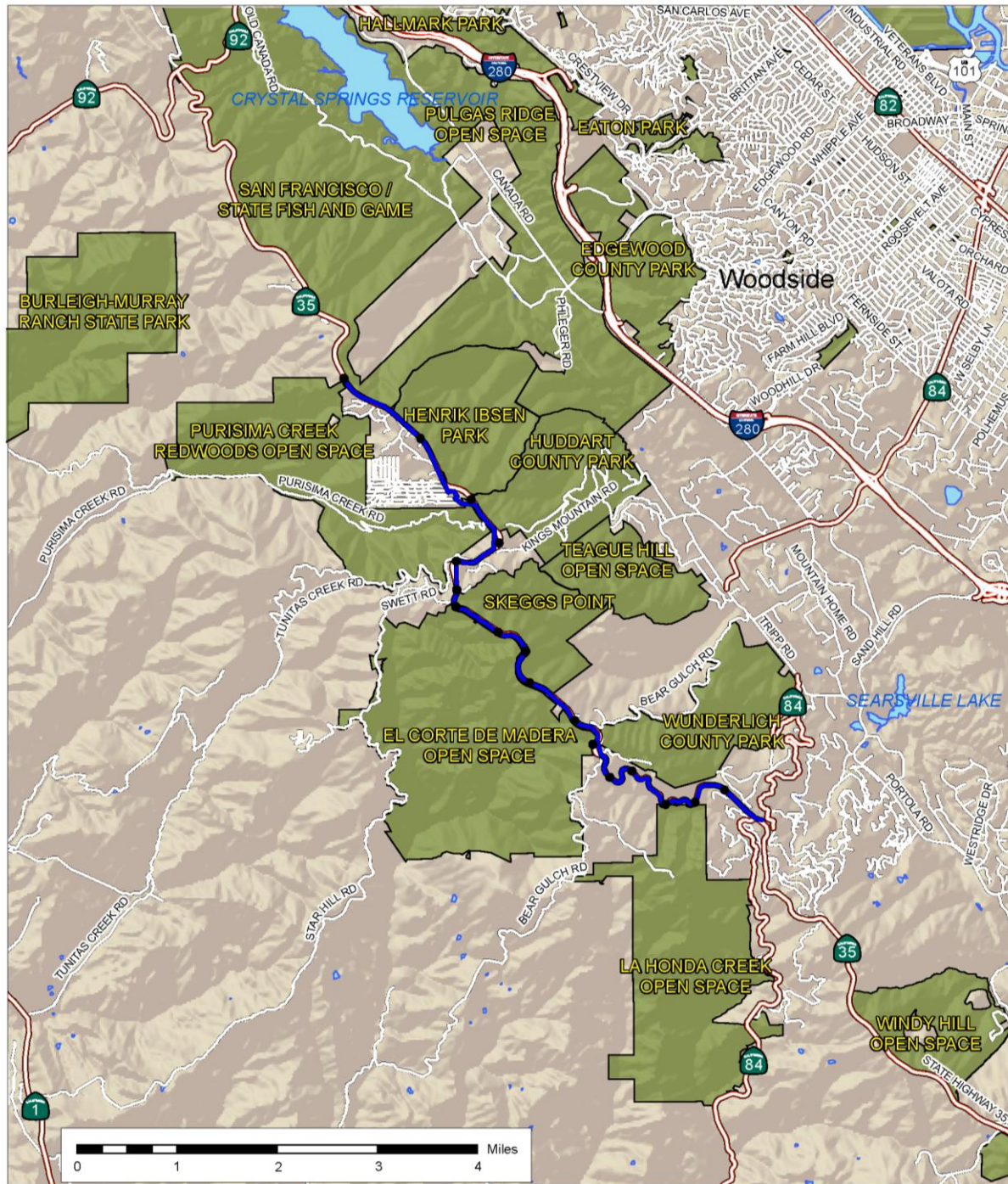
**Construction.** Construction activities would be visible throughout the immediate project area. Construction activities would take place between 7:00 AM and 6:00 PM on weekdays and between 9:00 AM and 5:00 PM on Saturdays, and would be of a short duration of 1 to 2 days at any one trenching or node location. Noticeable activities would include:

- Work crews accessing the project area
- Pruning of existing vegetation
- Presence of a rubber-tired backhoe with auger and a small crane for constructing new communication node poles
- Trenching and boring equipment for construction of buried conduit sections
- Bucket trucks for installing new aerial cable
- Trucks and other miscellaneous equipment

Only one scenic vista is located along the project alignment. Skeggs Point is a parking area with a scenic vista. Views of construction would be short-term (1 to 2 days). Implementation of APM Aesthetics-1 would ensure that construction impacts on scenic vistas remain at a less than significant level.

**APM Aesthetics-1.** The Skeggs Point parking area will not be utilized for staging of equipment, nor would access to the area be blocked during installation of project components.

**Figure 3.1-1: Open Space Areas in the Project Vicinity**



SOURCE: ESRI 2011 and ISD 2011

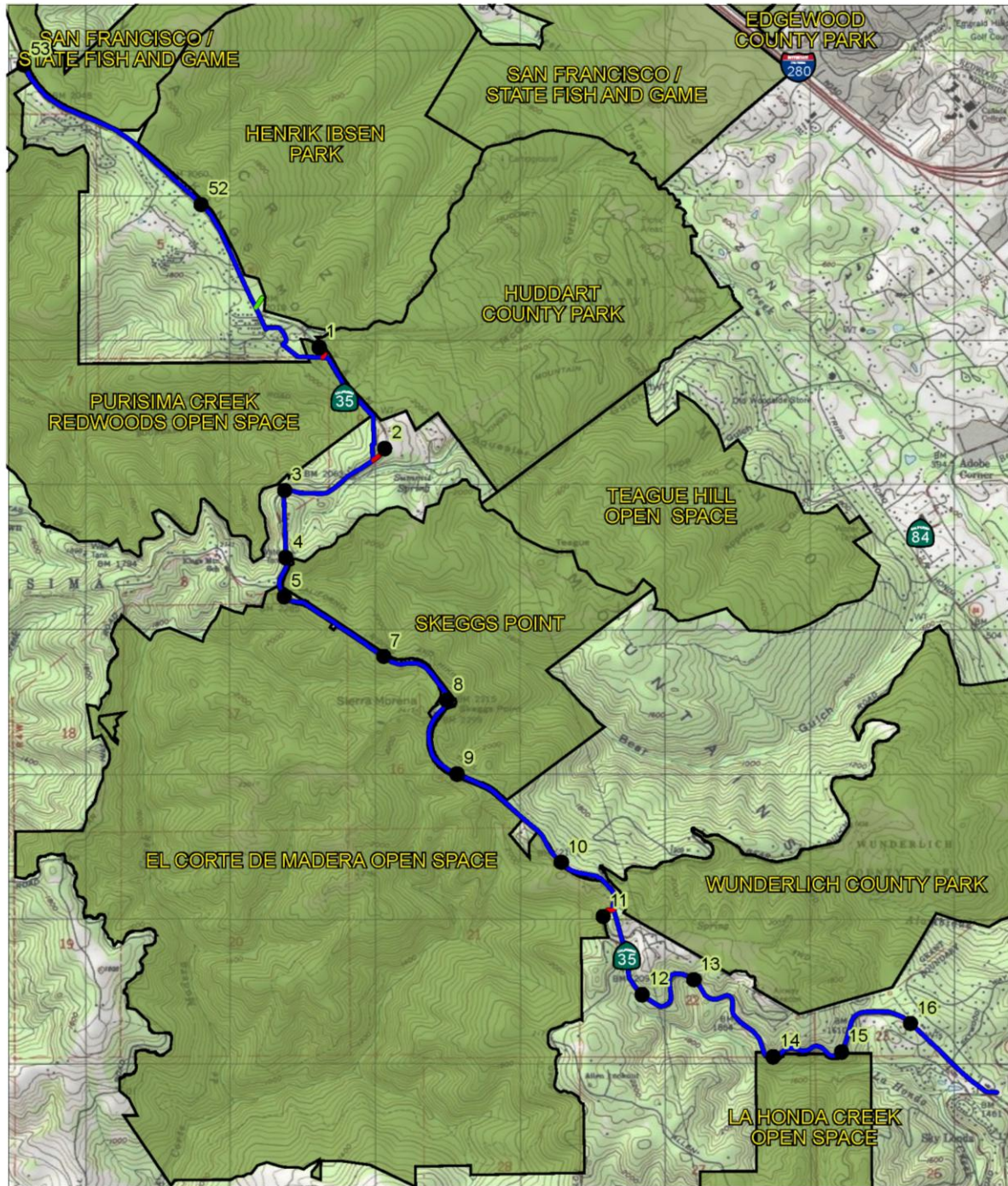
Scale: 1:100,000

**LEGEND**

-  Proposed Project Route
-  Node
-  Park or Recreation Area



Figure 3.14-1: Parks and Recreation Facilities in the Project Region



SOURCE: ESRI 2011 and ISD 2011

Scale: 1:43,000

**LEGEND**



- Proposed Project Route (Existing Underground)
- Proposed Project Route (Proposed Aerial)
- Proposed Project Route (Proposed Underground)

- Node
- Park or Recreation Area



Mitigation Measure Aesthetics-1. To maintain the visual integrity of the Skeggs Point scenic vista area, all equipment associated with construction of Node #8 shall be removed from the site daily.

Mitigation Measure Aesthetics-2. All construction activities associated with Node #8 shall occur during weekdays with no construction activities occurring during weekends or holidays.

**Operation and Maintenance.** The Skeggs Point scenic vista includes a one-way (south to north) vehicular circulation pattern. Existing utility poles are located on either side of the vista point entrance and exit. Because of the curved alignment of SR 35 at Skeggs Point, the existing electric circuits and other utility lines between the two poles are positioned immediately overhead of the highway and not within the vista area. The 57-foot-tall Node #8 pole and associated features would be located adjacent to the exit of the scenic vista point. The pole and communication facilities would be vivid from the scenic vista point as seen against its forest backdrop, as the proposed pole would be taller than adjacent existing utility poles, include a cross member near its top, and be positioned in open view immediately adjacent to the exit drive. ~~While the~~ The positioning of Node #8 communication facilities would be at the side of the vista point area and would not block or disrupt views from the vista point. ~~the impact to the scenic vista would be moderate. Without mitigation this~~ Impacts to views leaving the vista on the backdrop of the forest could be considered significant due to the appearance of the cross member and equipment on the pole. Implementation of mitigation measures Aesthetics 1 through Aesthetics-3 would ensure the unity and integrity of the scenic vista point and reduce the scenic vista visual impact of the Node #8 facilities on views of the surrounding forest to a less than significant level.

~~Mitigation Measure Aesthetics-1. To maintain the visual integrity of the Skeggs Point scenic vista area, all equipment associated with construction of Node #8 shall be removed from the site daily.~~

~~Mitigation Measure Aesthetics-2. All construction activities associated with Node #8 shall occur during weekdays with no construction activities occurring during weekends or holidays.~~

Mitigation Measure Aesthetics-3. The antenna array on Node #8 shall be positioned in a circle ~~close~~ flush mounted to the utility pole to conform to the design of other communication nodes that are part of the project.

5. Mitigation Measure Aesthetics-4 on page 3.1-11 of the Draft IS/MND has been revised as follows to correct an omission:

Mitigation Measure Aesthetics-4. All communication node features will include integral non-reflective coloring or be painted to be a non-reflective brown color in order to minimize glare created by these facilities. All communication node features will be mounted on the back side of the pole to reduce visibility from the road.

6. The second bullet item under APM Hydrology-1 on page 3.9-5 of the Draft IS/MND was potentially unclear. This bullet item has been revised as follows to provide greater clarity:
  - Following installation of the communications system, trenched and excavated areas shall be compacted and graded to the natural contours of the area as existed prior to construction activities, and reseeded with native vegetation.

7. Mitigation measure Traffic-1 on page 3.16-5 has been revised as follows:

**Mitigation Measure Traffic-1:** Lane closures will be limited to non-peak travel periods (between 9 AM and 4 PM on weekdays) to minimize traffic delays on SR 35. Construction activities, including lane closures, that could be disruptive to parking along SR 35 shall only take place on weekdays to avoid high parking demand on weekends.

8. APM Traffic-1 on page 3.16-5 has been revised as follows:

**APM Traffic-1:** A Traffic Management Plan will be submitted to Caltrans and San Mateo County prior to any construction activities. Project traffic control measures contained in this Traffic Management Plan will conform to the specifications of Caltrans and San Mateo County. The contractors retained for project construction will follow Caltrans' Standard Plan T13 ("Traffic Control System for Lane Closure On Two-Lane Conventional Highways") to manage traffic during the construction of the Project and to ensure that construction activity will not create unsafe traffic conditions. The Traffic Management Plan will include the use of portable warning signs, flaggers, and cones/barricades that will separate the construction activities from traffic. The Plan shall also include a requirement to maintain a detailed project schedule a minimum of ten (10) calendar days ahead of any work that could result in a disruption to traffic, parking, or access to public open space lands. The applicant shall notify visitors and the public a minimum of ten (10) calendar days in advance of such potential disruptions by providing written notice to the MROSD and by posting temporary signage in the vicinity of the proposed construction activities. When possible, the applicant shall strive to provide notice to the MROSD, visitors, and the public three (3) weeks in advance of such construction activities.

9. APM Traffic-2 on page 3.16-5 has been revised as follows:

**APM Traffic-2:** Complete closure of any residential, ~~or~~ commercial, or public open space driveway or gate entrance shall not occur during project construction. If the Project requires work across any driveways or gate entrances during trenching or excavation, large metal plates shall be placed across the trenches or excavated areas in order to allow ingress and egress for local residents, business owners, visitors to public open space lands, and emergency vehicles.

10. The project plans supplied by the applicant and available for review on the CPUC website erroneously make reference in a number of locations to "replacement poles". The use of replacement poles at some locations was initially considered but ruled out due to coverage issues, inability to use existing poles due to age, size, or lack of climbing space, and other technical reasons. Each location in the project plans that makes reference to "replacement poles" should instead read "new poles".