PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



December 18, 2017

Carl Eastlick Siskiyou Telephone P.O. Box 157 Etna, CA 96027

Project

Re:

Data Request #1 for the Siskiyou Telephone Happy Camp to Somes Bar Fiber Connectivity Project, Resolution No. T-17539

Dear Mr. Eastlick:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed all of the documents and materials that Siskiyou Telephone has provided, including the Proponent's Environmental Assessment (dated January 2016) that was submitted as part of the California Advanced Services Fund (CASF) application. In doing so, the CPUC has identified additional items that require information from Siskiyou Telephone. Attached please find Data Request #1, which defines the additional questions we have at this time. It should be noted that additional data requests may be necessary to address other CEQA topics and once Siskiyou Telephone's data responses are submitted.

We would appreciate your prompt responses to these data requests, which will allow us to maintain an expeditated schedule. We understand it may be difficult with the end of the year holidays, but we request that responses to as many items as possible be provided to us within three weeks (by January 9, 2017). Please submit one set of responses to me and one to Hedy Koczwara at Aspen Environmental Group (HKoczwara@aspeneg.com). Any questions on this data request should be directed to me at (415) 703-5484 or Jensen. Uchida@cpuc.ca.gov.

Sincerely,

Infrastructure Permitting & CEQA
California Public Utilities Commission

Attachment

cc:

Jack Mulligan, CPUC Legal

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Hedy Koczwara, Aspen Environmental Group

Siskiyou Telephone Happy Camp to Somes Bar Fiber Connectivity Project Data Request No. 1

Siskiyou Telephone Data Request, Set 1, includes data requests for the following issue areas:

- Project Description
- Biological Resources
- Cultural and Tribal Resources
- Hazards and Hazardous Materials

- Hydrology and Water Quality
- Transportation and Traffic
- Utilities and Service Systems

Project Description

PD-1 PEA Section 3.4.1 discusses hard-rock directional boring techniques. Please confirm that this is the same as horizontal directional drilling.

There is no information on any sending/receiving pits required for directional boring under streams or other features. How large are the entry and exit bore pits? Please describe.

- PD-2 PEA Section 3.4.2 discusses utility boxes and references "hand hole utility boxes". There are no utility boxes noted on the Siskiyou Telephone Staking Sheets provided in Appendix A. There is "flush to surface hand hole" in the map sheet legend and those shown on the maps. Are the "hand holes" the same as utility boxes?
- PD-3 Please provide a description of how cable would be installed in conduit and the method for splicing.
- PD-4 Please provide an illustration of a typical vault.
- PD-5 Please describe how road surface would be restored in places where it is opened for cable installation.
- PD-6 PEA Section 3.5 states "[a]Il construction equipment would remain within existing roadways or road shoulders." This is a very broad description as road shoulders can be quite wide and/or have sensitive resources. There should be a maximum width noted for construction equipment and vehicle use in areas where there are not turnouts and temporary parking areas.
- PD-7 PEA Section 3.6.6 discusses erosion and sediment control and pollution prevention during construction. Please also provide a detailed description of the Horizontal Directional Drilling Frac-out Prevention and Contingency Plan.
- PD-8 Have all of the temporary overnight parking and staging areas shown on the engineered drawings (Appendix A map sheets) been accounted for as temporary disturbance areas (acres)?
- PD-9 Appendix A Phase 1 map sheets have two of map sheet 43 of 50 and is missing map sheet 44 of 50.
- PD-10 Appendix A Phase 3 map sheet 2 of 19 shows three (3) boxes with an "x" in them that is not described in the legend. What does this symbol represent?

- PD-11 The proposed project is described as a link between the Highway 101 and I-5 systems. Please provide a schematic or map showing how this project fits with rest of regional fiber optic system.
- PD-12 Are there any future phases planned for construction/installation following the proposed project?
- PD-13 Please provide GIS data for the project components, if available. Namely it would be useful to have GIS files for the project alignment, utility box locations, and culverts and stream crossings. GIS file should identify areas of trenching versus directional drilling and areas where the bank may need to be excavated for utility boxes.

Also, copies of figures from the CASF application and PEA, including Appendix A, would useful in higher resolution for inclusion in the environmental document.

Biological Resources

- Please address the potential for species designated as Forest Service Sensitive to Occur within the area potentially affected (directly or indirectly) by the proposed project.
- Please identify the potential wetlands and waters of the US and State present in the project area, in text and on maps. On the maps, identify the jurisdictional limit of each feature. Provide the Delineation conducted for this project. Provide justification for the statement on PEA page 4-23 that there are no federally jurisdictional resources in the Project Area.
- Please identify the presence of critical habitat for any federally listed species in the project area.
- BiO-4 PEA Section 4.4.3 discusses Impacts and Mitigation Measures. 4a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Address potential impacts to special-status species from horizontal directional drilling frac-outs.

PEA Section 4.4.3 discusses Impacts and Mitigation Measures. 4c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? Address potential impacts to federally and State protected wetlands and waters from horizontal directional drilling frac-outs.

Please define the distance from the jurisdictional limit of each of the 10 stream crossings that the HDD entry/exit bore pits would be located, and illustrate these (jurisdictional limits and bore pits) on maps.

The Habitat Assessments (Appendix C) had the following recommendations that were not translated into APMs in the PEA. Please provide APMs for the recommendations.

"The potential to affect the Del Norte salamander is low; however, to minimize risk of harming the salamander, work should be conducted during dry weather to reduce the

potential of surface activity and movement. Additionally, during the Wyman Creek horizontal drill activity, it is recommended that the contractor set up and demobilize drilling equipment during dry weather to minimize potential foothill yellow-legged frog surface movements."

PEA Section 4.4.3 discusses Impacts and Mitigation Measures, stating: 4d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites? K-rail could be a barrier to the movement of animals across roads.

Will k-rail be used to protect the work area from traffic?

Cultural and Tribal Resources

- CUL-1 In order to assess impacts to cultural resources occurring within the proposed project area, please provide the following:
 - Technical report and all appendices;
 - NAHC and tribal correspondence;
 - CHRIS and all other data request files (actual data, not the summary of data); and
 - Any GIS data developed for the technical report.

Any confidential data may be sent directly to Aspen's Registered Professional Archaeologist, Diana Dyste (ddyste@aspeneg.com).

Hazards and Hazardous Materials

- Please provide a list of all hazardous materials anticipated to be used during construction of the project, location(s) where they would be stored, and approximate volumes that would be stored during construction.
- **HAZ-2** What types of hazardous waste is likely to be generated and where would it be stored prior to disposal?
- **HAZ-3** Where will construction vehicles and equipment be refueled?

Hydrology and Water Quality

- HYDRO-1 The project description states that stream crossings will be accomplished by directional or horizontal drilling at a depth of 30 feet if wet and 18 feet if dry. It is not clear why this distinction is made, as it is possible that subsurface water will be encountered in dry as well as wet streams. Please provide the rationale for using two depths, and how these depths were determined.
- HYDRO-2 The project description states that water will be used during construction, but does not provide an estimate of the amount and source. Please provide an estimate of the amount of water that will be used for construction and operation, and the source.
- HYDRO-3 The PEA Hydrology and Water Quality section states that groundwater encountered during construction will be removed, but it is not clear what will be done with this

water. Please provide a description of the disposal location and procedures for dewatered water.

Public Services

PS-1

Section 4.14, Public Services, does not include information on medical services available in the Project area. What are the nearby hospitals/medical providers that would be used in the event of an emergency? What are the response times if those are available?

Transportation and Traffic

- Table 3-1 in PEA Section 3.6.2, Work Areas, describes construction workforce and equipment and presents the number and type of machinery needed during construction. However, the traffic resulting from the use of heavy equipment, deliveries, and construction workers during construction or trips required during operations and maintenance are not discussed or presented in the table.
 - Please specify the estimated maximum number of daily vehicle trips and total project vehicle trips during project construction.
 - Please specify the estimated number of vehicle trips expected during operations and maintenance of the telecommunications lines.
- T-2 Where are construction crews expected to come from, i.e., what defines the "local workforce" stated in PEA Section 4.13, Population and Housing?
- T-3 The PEA is vague on the details of the operation and maintenance of the Project. Where are maintenance crews expected to come from? How frequently are maintenance activities expected to occur and how long will each maintenance activity take?

Utilities and Service Systems

US-1 The environmental setting in PEA Section 4.17, Utilities and Service Systems, is not clear as to whether all waste in the area goes to the Happy Camp Disposal site, or whether only the waste from the project would be transferred to the Happy Camp disposal site. Please clarify.

In addition, the text states that the waste is transported daily. Again, please clarify if this is for all of the waste generated in the area, or just for the project?