

December 12, 2025

Ms. Ruchita Acharya, Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: *November 2025 Monthly Summary Report for the Zayo's Prineville to Reno Fiber Optic Line Project*

Dear Ms. Acharya:

This report provides a summary of California Public Utilities Commission (CPUC) compliance monitoring activities occurring from November 1 to November 30, 2025, for Zayo's Prineville to Reno Fiber Optic Line Project (Project). CPUC compliance monitoring is performed to ensure all Project-related activities conducted by Zayo and their contractors follow the Senate Bill 156 Exemption Conditions of Approval for the Project, as adopted by CPUC on August 10, 2023.

The CPUC has issued the following Notices to Proceed (NTP) for the Project:

- NTP #1 (November 27, 2023): All construction activities including vegetation removal, trenching, drilling, except for areas within 1,000 feet of three cultural resources sites on Bureau of Land Management (BLM) managed land: P-18-001973/CA-LAS001973, P-25-001323/XL1982-038, and P-25-003860/CA-MOD-3860/41.12.24.03. All ground-disturbing work in May 2024 was conducted under this NTP.
- NTP #2 (September 12, 2024): Allows construction within 1,000 feet of sites P-18-001973/CA-LAS-001973/XL-192-038, and P-25-003860/41.12.24.03 using directional drilling and in compliance with the BLM- and CPUC-approved Historical Resources Treatment Plan (H RTP).
- NTP #3 (November 21, 2024): The boundary of P-25-001323/KL 1982-038 has been revised as a result of additional investigation and the revised site boundary shows that the site extends farther west than originally mapped. NTP #3 includes an addendum to the H RTP with additional measures to ensure avoidance of the site, including using horizontal directional drilling to a minimum depth of 2 meters. NTP #3 also includes an adjustment of the running line location that crosses U.S. Route 395 in the area immediately north of the aforementioned site boundary to avoid an area of steep slope.

Stantec staked the environmentally sensitive area boundaries in advance. Robinson Brothers Construction's (RBC) work included testing the conduit for the week of November 3-7. For the remainder of the month of November, Zayo, RBC, and Stantec initiated project close out activities including SWPPP closeout, stabilizing the running line, applying seed mix, removing staking and flagging, and other activities to return the construction area to pre-project conditions.

Stantec provided full-time onsite environmental compliance monitoring of construction activities. Stantec's site inspection reports summarize observed construction activities and compliance events and

verify avoidance and mitigation measures were completed where applicable. These reports are attached in Appendix A, Stantec Daily Compliance Reports.

Communication

Communication between Zayo, RBC, CPUC, California Department of Transportation, and Stantec has been regular. Daily email updates have been discontinued; however, regular communication is practiced through weekly emails and a compliance team meeting every Monday morning, where topics include upcoming compliance-related surveys and issues, deliverables, and the upcoming construction schedule. The last Monday construction meeting occurred on November 10, 2025.

Compliance Incidents

Construction crews did not have any compliance incidents during the November 2025 reporting period.

Noise Compliance

Construction crews did not exceed noise thresholds during the November 2025 reporting period.

Spills

No spills occurred during the November 2025 reporting period.

Public Concerns

No public concerns related to environmental compliance occurred during the November 2025 reporting period.

Minor Project Refinements

No Minor Project Refinements were approved during November 2025.

Additional Notes

No ECORP monitoring occurred during November 2025 because there were no ground-disturbing activities during this month.

Sincerely,



Anne Surdzial, AICP
Vice President, Director of CEQA/NEPA Services

LIST OF APPENDICES

Appendix A – Stantec Daily Compliance Monitoring Reports for the Zayo Project, November 2025

Appendix B – Stantec Weekly Reports for the Zayo Project, November 2025

Appendix C – Stantec Monthly Report for the Zayo Project, November 2025

Appendix D – Zayo Minor Project Refinement Requests/Approvals, November 2025

Appendix E – Zayo Project Non-Compliance Reports, November 2025

Appendix F – ECORP Daily Compliance Monitoring Reports, November 2025

Appendix G – Additional Zayo Project Management Plan Approvals, November 2025

Stantec Daily Compliance Monitoring Reports for the Zayo Project, November 2025

No additional Stantec Daily Reports were received.

Stantec Weekly Reports for the Zayo Project, November 2025



Prineville to Reno Fiber Optic Project (CA Section)

Weekly Construction and Monitoring Update

3 November 2025

Proprietary and Confidential

SAFETY MOMENT



Stop & Talk: Types of Snow Conditions

Health, Safety, Security, & Environment

SaferTogether

When road markings are obscured, slow down and leave lots of stopping distance. Always clear snow from your vehicle, including the roof (as a courtesy to the cars behind you). Clear off your hood, lights, mirrors and windows. The following are various types of snow conditions you should be aware of and take precautions against:

- **Pavement Frost** – a buildup of frost that reduces braking power
- **Drifting Snow** – blowing snow due to winds; may cause snow to stick to road surfaces and lower visibility
- **Swirling Snow** – snow that is circling on road surfaces; caused by wind and traffic
- **Loose Snow** – less than 8 centimeters (approximately 3 inches) of unpacked flakes covering the driving surface
- **Heavy Snow** – more than 8 centimeters (approximately 3 inches) of denser snow that can cause problems when stopping or passing
- **Snow Packed** – the entire road is coated in densely packed snow
- **Snowdrifts** – small peaks of snow at intermittent intervals
- **Visibility Reduced** – drivers can see less than 800 meters (0.5 mile) ahead



Information provided by CAA Magazine, Winter 2020

If you have questions, please contact your supervisor, [Office Safety and Environment Coordinator \(OSEC\)](#), or local HSSE representative

*HSSE Stop & Talk are written for educational purposes and are not intended to replace safe work practices or procedures.
ver. December 2020*



Action Items

Stantec Actions

- Vegetation % cover data [summary and memorandum](#)
 - Submitted to CPUC and BLM on 15-Oct-2025
 - CPUC forwarded to Caltrans on 15-Oct-2025
 - [Comments received from CPUC on 22-Oct-2025](#)
 - [Finish responding to CPUC comments today](#)

WEAP Trainings (All)

- Recorded WEAP Modules available online in Google Drive
- Supervisors need to check and update confirmation sheets
- Separate sheets for Stantec, Zayo, CPUC, RBC, Tribes

Construction Tracking

Construction Schedule 3-7 November 2025 MO-FR

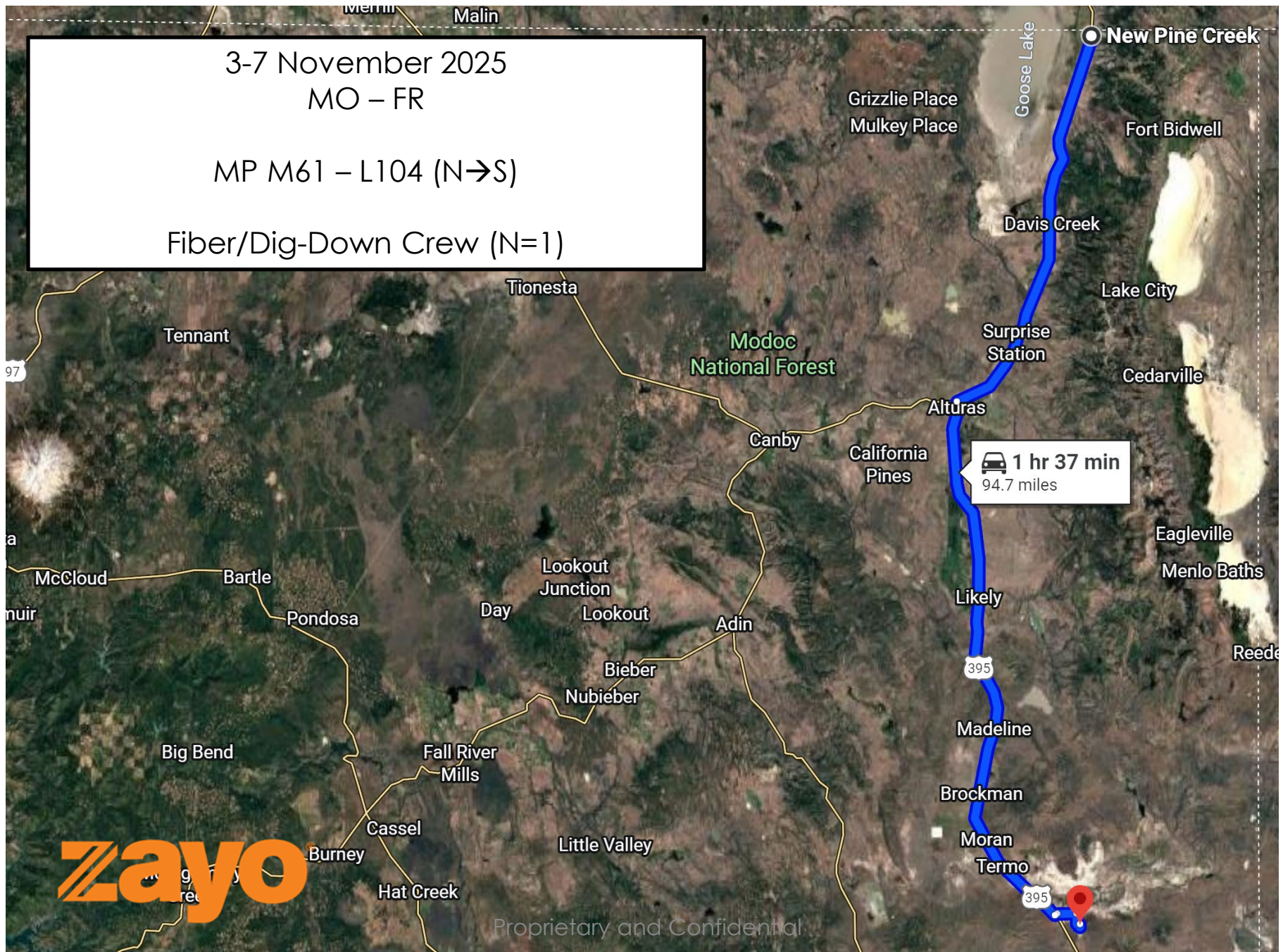
North Crews (N = 1)

1 Fiber/Dig-Down Crew	N→S	MP M61–L104
Meeting Time/Location	6:30 AM	Likely Fire Station

3-7 November 2025
MO – FR

MP M61 – L104 (N→S)

Fiber/Dig-Down Crew (N=1)



Construction Look-Ahead

Construction schedule for 10-14 November 2025 will be provided with the PDF of this slideshow later this week.

Monitoring Tracking

Monitoring Schedule 3-7 November 2025

North Crews (N = 1)

1 Crew Fiber/Dig-Down Crew MO – FR N→S MP M61–L104

Meeting Time/Location 6:30 AM Likely Fire Station

- All construction crews require EI, cultural, and tribal monitoring
- Paleo needed in red zones on project webmap
- Bio monitors covering multiple construction crews

Monitoring Look-Ahead for Week of 10-14 November 2025

See preceding slide. Likely one monitoring crew with 1 fiber/dig-down crew.

Close-Out Tasks

RBC Tasks

- Schedule updates as they occur
- Clean-up tasks: Driveway repairs, boulder removal, etc.
- Produce redlines

Stantec Tasks

- Stantec completed vegetation % cover plots
 - Memo and data submitted to CPUC and BLM 15-Oct-2025
 - CPUC forwarded to Caltrans on 15-Oct-2025
 - Stantec responding to CPUC comments
- Produce as-builts from RBC redlines
- Remove resource staking and flagging at conclusion of project

CPUC/BLM Tasks

- CPUC conducting site visit to review vegetation % cover data.

Weather Forecast

Current conditions at

HIDDEN VALLEY (HDVC1)

Lat: 40.44192°N Lon: 120.62694°W Elev: 4452.0ft.

NA

57°F
14°C

Humidity 59%
Wind Speed SSE 1 MPH
Barometer NA
Dewpoint 43°F (6°C)
Visibility NA
Last update 03 Nov 08:11 AM PST

More Information:

[Local Forecast Office](#)

[More Local Wx](#)

[3 Day History](#)

[Hourly Weather Forecast](#)

Extended Forecast for

Susanville CA

Today



High: 68 °F

Sunny

Tonight



Low: 43 °F

Partly Cloudy
then Chance
Rain

Tuesday



High: 65 °F

Chance Rain

Tuesday Night



Low: 42 °F

Slight Chance
Rain and
Breezy

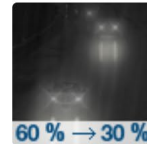
Wednesday



High: 53 °F

Rain and
Breezy

Wednesday
Night



Low: 38 °F

Rain Likely
and Breezy
then Chance
Rain

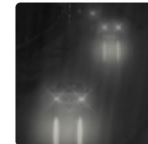
Thursday



High: 58 °F

Partly Sunny

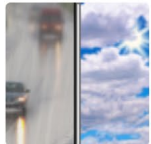
Thursday
Night



Low: 38 °F

Chance Rain

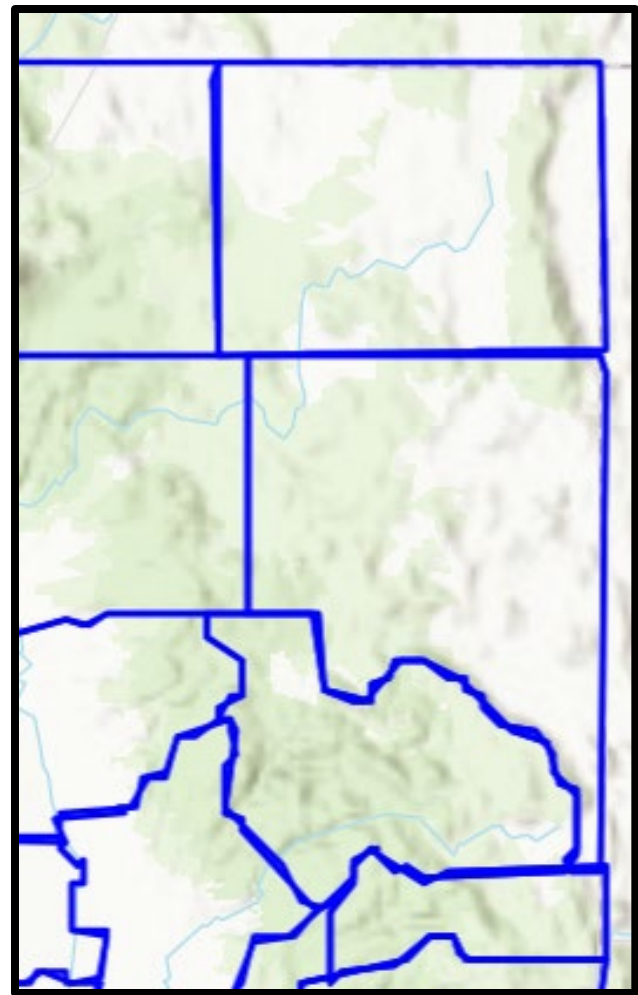
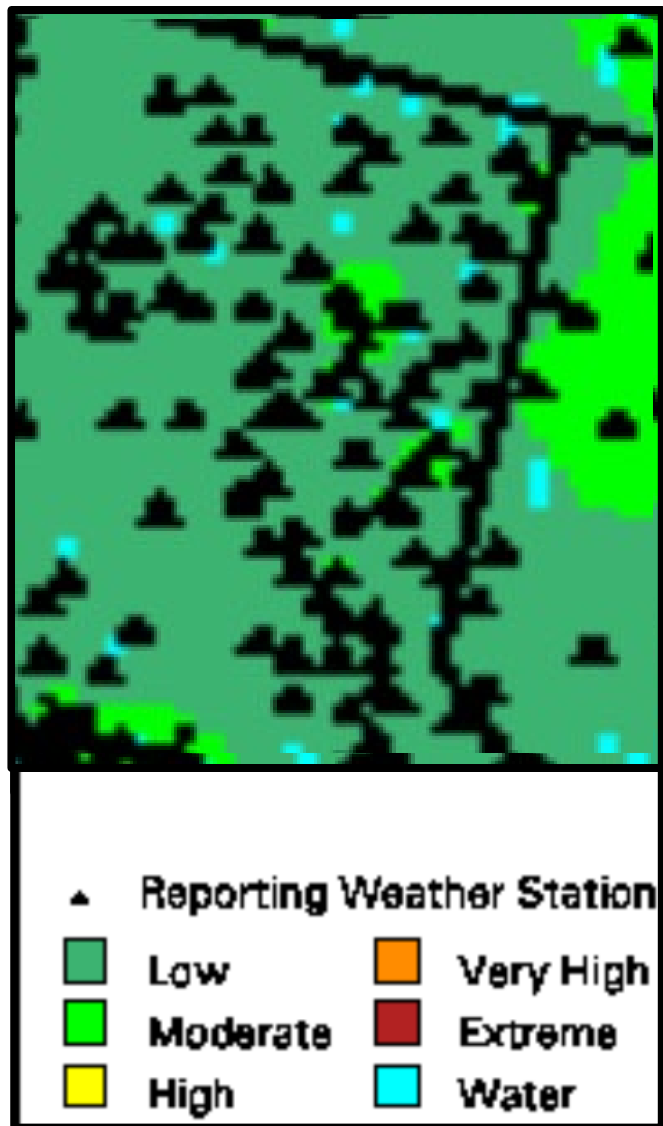
Friday



High: 59 °F

Chance Rain
then Partly
Sunny

Wildfire Risk



No Red Flag or
Fire Weather Warnings

Primary Contacts

Name/Role	Phone Number
Dan Barcomb – Project Manager, Zayo	509-727-3345
Sara Lindberg – Senior Principal, Stantec	907-328-9622
Sarah Miller-Sampson – Project Coordinator, RBC	360-946-3795
Charles Keegan – Site Supervisor/Safety Officer, RBC	541-410-9357
Brianna Daniels – Resident Engineer, Stantec	805-588-3170
Steve Towers – Project Manager, Stantec	530-410-5966
Erin Sherlock – Senior Archaeologist, Stantec	707-782-3059
Alyssa Bell – Principal Paleontologist, Stantec	417-793-8680
John Holson – Senior Biologist, Stantec	916-397-9832
John Cylwik – Qualified SWPPP Developer (Water Quality), Stantec	925-433-3518
Justin Giusti – Environmental Field Coordinator, Stantec	530-310-2517



Prineville to Reno Fiber Optic Project (CA Section)

Final Construction and Monitoring Update

10 November 2025

Proprietary and Confidential

SAFETY MOMENT

End-of-project stress caused by:

- Deadline/wrap-up pressures
- Employment insecurity
 - Next project?
 - Industry prospects?
- Workplace changes (duties, routines, locations)
- Change of status
- Seasonal changes (workload and SAD)

Ways to cope with stress:

- Identify stressors
- Examine and restructure your schedule
- Be proactive about redefining/expanding your role
- Take advantage of time off
 - Rest and recharge
 - Learn a new skill



Close-Out Tasks

1. Finalize vegetation % cover memorandum after responding to comments (BIO-6)
 - a. CPUC providing 2nd round of comments
2. Finalize and submit red-lines/as-builts to Caltrans
3. SWPPP closeout and Notice of Termination
 - a. Remove BMPs where locations are stabilized and veg has recovered (if required)
 - b. BMPs near waterways and where veg has not recovered to remain until Spring
4. Return project work areas (including staging areas) to pre-project conditions.
 - a. Stabilize running line, remove rocks >6 in from w/in 20 ft of EOP, remove leftover fill material, return to pre-construction contours (BIO-5, CT encroachment permit)
 - b. Apply seed mix where veg cover criteria are not being met per RRP (BIO-6)
5. Remove staking and flagging from Caltrans ROW (AES-1)
6. Final inspection by CPUC after demobilization and seeding completed

Goodbye!

This is the last of the “all hands” project meetings.

Future meetings will be scheduled as needed to address specific topics with selected invitees.

Thanks to everyone involved for making this challenging project a success!

Primary Contacts

Name/Role	Phone Number
Dan Barcomb – Project Manager, Zayo	509-727-3345
Sara Lindberg – Senior Principal, Stantec	907-328-9622
Sarah Miller-Sampson – Project Coordinator, RBC	360-946-3795
Charles Keegan – Site Supervisor/Safety Officer, RBC	541-410-9357
Brianna Daniels – Resident Engineer, Stantec	805-588-3170
Steve Towers – Project Manager, Stantec	530-410-5966
Erin Sherlock – Senior Archaeologist, Stantec	707-782-3059
Alyssa Bell – Principal Paleontologist, Stantec	417-793-8680
John Holson – Senior Biologist, Stantec	916-397-9832
John Cylwik – Qualified SWPPP Developer (Water Quality), Stantec	925-433-3518
Justin Giusti – Environmental Field Coordinator, Stantec	530-310-2517

Stantec Monthly Report for the Zayo Project, November 2025

To:	Ruchita Acharya, CPUC Anne Surdzial, ECORP Brian Marks, ECORP	From:	Steve Towers, Environmental Compliance Manager, Stantec
	Dan Barcomb, Zayo Adam Moon, Zayo		Zayo Group, LLC
File:	Zayo Prineville to Reno Fiber Optic Project	Date:	December 10, 2025

Reference: Zayo Prineville to Reno Fiber Optic Project, Monthly Environmental Compliance Report for November 2025

This report provides a summary of environmental compliance associated with the Zayo Prineville to Reno Fiber Optic Project (Project) for the month of November 2025 in compliance with Section 3.3.1.3 in the Project Conditions Monitoring, Compliance, and Reporting Program (CMCRP).

CONSTRUCTION SCHEDULE AND PROGRESS

Biologists/Environmental Inspectors (Bio/EIs) conducted pre-construction surveys in front of RBC Horizontal Directional Drilling (HDD) crews, plows, rippers, rock hammers and tie-in crews. In general, the construction was in all three work areas: the northern, central, and southern areas. In the northern area, the Bio/EIs monitored tie-ins and drilled north and south of Alturas from mile post (MP) 3.0 to Modoc MP 36. In the central and central-southern area construction operations north of Doyle moved north towards Susanville and through County Road A3 to Lassen MP 94. The southern area included operations from Doyle working north towards County Road A3.

The Bio/EIs completed pre-construction surveys for RBC operations, including invasive plants, rare plants, waterways/wetlands, and amphibians/reptiles near waterways. All sensitive resources in the Area of Direct Impacts (ADI) were staked and flagged well before construction crews. Bio/EIs re-staked and flagged the ADI where Caltrans had mowed stakes and flagging. Best management practices (BMPs) were used as required on the project, including Stormwater Pollution Prevention Plan (SWPPP) BMPs.

The Bio/EIs continued to conduct pre-construction surveys and check staking and flagging of resources. Pre-construction nesting bird surveys continued until September 30, 2025, but were no longer required during the month of November 2025.

The November 2025 work description and schedule included one dig-down and/or fiber crew. These crews worked throughout the project site in the central and southern areas and conducted work only from November 3 to 7 during the month of November.

Construction monitoring for the project is complete as of November 2025.

NON-COMPLIANCE INCIDENTS REPORT

No non-compliance incidents occurred during the November 2025 work.

SURVEY EFFORTS

The Lead EI has coordinated specialty environmental monitors and assisted construction crews with interpreting environmental measures. During this reporting period, the Bio/EI, Archaeological Monitor, and Qualified SWPPP Practitioner (or designee) were on site implementing measures to avoid resource impacts.

BIOLOGICAL/EI ACTIVITIES

The Bio/EI inspector conducted monitoring for biological resources and flagged environmental resources in accordance with BIO-2, BIO-4, BIO-7 through BIO-9, BIO-11, and BIO-14 through BIO-16. Observations included:

- Flagging of aquatic resources boundaries, rare plant populations, and other environmental resource exclusions zones.
- SWPPP inspections were conducted as required. BMPs were installed and maintained in good working condition.

CULTURAL ACTIVITIES

Cultural Resources specialists completed the following:

- Continued monitoring all ground disturbing work activities for the project through November 5, 2025.
- Continued pre-construction flagging of ESAs ahead of construction and continued to address flagging disturbed by vegetation management through November 5, 2025.
- No new cultural resources were observed.
- Field crews demobilized November 6, 2025.

PALEONTOLOGICAL ACTIVITIES

For the month of November 2025, Stantec had one paleontologist deployed to the project to monitor ground disturbing activities for the week ending Friday, November 7, 2025. No paleontological monitoring occurred that week, although the paleontological monitor was onsite each day initially to confirm whether work would occur in areas requiring monitoring. Once established that monitors were not needed, the monitor remained in town on standby. The monitor remained in town on standby for three days from Monday, November 3, 2025, through Wednesday, November 5, 2025. Additionally, the monitor inspected paleontological exclusion zones along the alignment to confirm flagging and staking were in place on November 3, 2025. Following work on Wednesday, November 5, 2025, the monitor was demobilized home following notice from construction that ground disturbance requiring monitoring was complete for the Project.

No new fossil localities were documented for November 2025.

The daily breakdown of standby days is provided in Table 1. No paleontological monitoring occurred this month.

Table 1. Paleontological Monitoring in November 2025

Day	Date	Technicians Monitoring / Total Technicians	Fulltime Monitoring MPs	Spot Check Monitoring MPs
Monday	11/3/2025	0/1	Standby Day	
Tuesday	11/4/2025	0/1	Standby Day	
Wednesday	11/5/2025	0/1	Standby Day	
Thursday	11/6/2025	0/1	Cancelled	
Friday	11/7/2025	0/1	Cancelled	

PREPARATION FOR IMPLEMENTATION OF ENVIRONMENTAL MEASURES FOR FUTURE WORK PHASES

Construction monitoring is complete.

PROJECT CHANGES

No project changes.

AGENCY DELIVERABLES

No agency deliverables.

MONTHLY PUBLIC COMPLIANT REPORT

No public complaints recorded.

Zayo Minor Project Refinement Requests/Approvals, November 2025

No additional Minor Project Refinements were received.

Zayo Project Non-Compliance Reports, November 2025

No Non-Compliance Reports were received.

ECORP Daily Compliance Monitoring Reports, November 2025

No additional ECORP Monitoring Reports were produced.

Additional Zayo Project Management Plan Approvals, November 2025

No additional Project Management Plans were received.