

March 14, 2025

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

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

Dear Ms. Chen:

This report provides a summary of California Public Utilities Commission (CPUC) compliance monitoring activities occurring from February 1 to February 28, 2025, for Zayo's Prineville to Reno Fiber Optic Line Project (Project). Work was stopped due to inclement weather on February 3 through February 15. 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 Notice 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 (HRTP).
- 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 HRTP 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 US 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 boring with multiple horizontal directional drilling crews and pulling conduit through the boreholes south of Alturas, within the central portion of the Highway 395 corridor, and at the southern end the Project. Plowing/trenching and tie-in crews were implemented during this construction period at the north, central, and southern portions of Highway 395 within California. 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.

Compliance Incidents

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

Noise Compliance

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

Spills

No spills occurred during the February 2025 reporting period.

Public Concerns

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

Minor Project Refinements

ECORP reviewed and recommended approval for one Minor Project Refinement request, which adjusted the running line to avoid construction on slope faces and to avoid tree driplines.

Additional Notes

There are no additional notes for February.

Sincerely,

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

LIST OF APPENDICES

- Appendix A Stantec Daily Compliance Monitoring Reports for the Zayo Project, February 2025
- Appendix B Stantec Weekly Reports for the Zayo Project, February 2025
- Appendix C Stantec Monthly Report for the Zayo Project, February 2025
- Appendix D Zayo Minor Project Refinement Requests/Approvals, February 2025
- Appendix E Zayo Project Non-Compliance Reports, February 2025
- Appendix F ECORP Daily Compliance Monitoring Reports, February 2025
- Appendix G Additional Zayo Project Management Plan Approvals, February 2025

APPENDIX A

Stantec Daily Compliance Monitoring Reports for the Zayo Project, February 2025 No additional Stantec Daily Reports were received.

APPENDIX B

Stantec Weekly Reports for the Zayo Project, February 2025

No Weekly Reports were received.

APPENDIX C

Stantec Monthly Report for the Zayo Project, February 2025

То:	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:	March 10, 2025

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

This report provides a summary of environmental compliance associated with the Zayo Prineville to Reno Fiber Optic Project (Project) for the month of February 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, bridge hanging crews, plows, rippers, rock hammers and tie-in crews. In general, the construction was in three areas: the northern, central, and southern areas. In the northern area, the Bio/EIs monitored bridge hanging operations at several bridge locations in Modoc County (MP 16.52, MP 3.73, MP 21.8). The Central Area consisted of RBC's bridge hanging crew, plow, ripper, and drill operations south of Doyle moving north towards Susanville and through County Road A3 to Lassen MP 94. For the southern operations RBC did ripping, plowing, drill operations, and tie-ins from near the Nevada border working north around Milford. Examples of these operations can be seen in Figures 1-7.

The Bio/Els 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. Where Caltrans had mowed stakes and flagging, Bio/Els re-staked and flagged the ADI. Best management practices (BMPs) were used as required on the project.

The Bio/EIs continue to conduct pre-construction surveys and check staking and flagging of resources. This includes surveys for early season nesting birds such as golden eagles, great-horned owls, and cliff swallows. No active nests were observed in February 2025.

Representative monitoring photographs are included below as Attachment A. Representative Photographs, Figures 1-7.

The March 2025 work description and schedule includes continued bridge hanging, HDD drilling with up to five HDD rigs total plus two (sometimes three) separate plow crews. Each plow crew includes a plow, ripper, clean-up crew, tie-in crew and rock saw/hammer. One plow crew will be based out of the north working towards Susanville, and the other will be based out of the south working from near the town of Susanville towards the north. Three HDD rigs will continue to work from south to north from the Lassen County border along with up to four tie-in/hand hole/cleanup crews. One HDD rig working in association with the northern plow and tie-in crews will work towards Susanville from the Alturas area. In addition, up to two separate tie-in



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crews and possibly one of the HDD crews will fall back to fill in gaps throughout the northern section, starting near Alturas.

NON-COMPLIANCE INCIDENTS REPORT

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

SURVEY EFFORTS

The Lead EI has and will continue to coordinate specialty environmental monitors and assist construction crews with interpreting environmental measures. During this reporting period, the Bio/EI, Archaeological Monitor, and Qualified Stormwater Pollution Prevention Plan (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.
- Nesting bird surveys were conducted for early season nesting species such as cliff swallow, golden eagle and great-horned owl. No active nests were found in February 2025; general practice is that all active nests are recorded on Survey 123 and Field Maps which then project the locations, species, and nesting status (meta data) recorded in the field by biologists. This includes associated species buffers on Field Maps for RBC and the California Public Utilities Commission (CPUC) to see in real time. As nesting status changes from being active to inactive (or vice versa), as fledging, or other factors alter the status, this too is being updated and the species point will still be visible, but the status will go to inactive, and the buffer will be removed.
- As part of the nesting bird surveys, when being conducted, an internal nesting tracker is also being used and presented to RBC at the end of each week for their scheduling and planning purposes.
- SWPPP inspections were conducted as required. BMPs were installed and maintained in good working condition.

CULTURAL ACTIVITIES

Cultural Resources specialists completed the following:

- Stantec archaeological monitors identified one precontact lithic scatter site as an inadvertent discovery.
 - A precontact lithic scatter was identified directly adjacent to the ADI boundary, on the eastern side of US Highway 395 at mile post MP L97.72 within the Caltrans right-of-way, in Lassen County (Eagle Lake Bureau of Land Management [BLM] landownership). The site consists of nine small reduction obsidian and chert flakes.
 - Site was recorded and a 50-foot buffer was implemented, however this was reduced to flagging up to the ADI boundary, as site was outside the ADI and no resources were identified within the ADI.
 - Once it was determined work within the ADI would not impact the site, work was not impeded.



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- Continued monitoring all ground disturbing work activities for the project.
- Completed the DPRs and recommendations for the survey sites between MP M10.5-M4, within the Caltrans right-of-way, Modoc County.
 - Currently in the process of getting BLM approval for these recommendations.

PALEONTOLOGICAL ACTIVITIES

For the month of February 2025, Stantec paleontologists conducted monitoring of tie-in trenching within Lassen County. Stantec had two to three paleontological technicians per week deployed to the Project as monitors, who attended tailboards with the crews and other monitors. Monitoring occurred on two days— February 25, 2024, and February 26, 2024. While monitors were onsite for additional days, excavations did not occur in areas requiring paleontological monitoring.

No new fossil localities were documented this month.

The daily breakdown of the monitoring locations is provided in Table 1. Examples of monitoring locations are shown in Attachment A. Representative Photographs, Figure 8.

Day	Date	Technicians Monitoring / Total Technicians	Fulltime Monitoring MPs	Spot Check Monitoring MPs		
Wednesday	2/19/2025	0/2	Standby day			
Thursday	2/20/2025	0/2	Standby day			
Friday	2/21/2025	0/2	Standby day			
Monday	2/24/2025	0/3	Standby day			
Tuesday	2/25/2025	1/2	L-25.2, L-27.6 N/A			
Wednesday	2/26/2025	1/2	L-27.2 N/A			
Thursday	2/27/2025	0/2	Standby day			
Friday	2/28/2025	0/1	Standby day			

Table 1. Paleontological Monitoring in February 2025

M- (Modoc County MP)

L- (Lassen County MP)

C- (County Road A3)

PREPARATION FOR IMPLEMENTATION OF ENVIRONMENTAL MEASURES FOR FUTURE WORK PHASES

Bio/Eis will continue to conduct resource surveys, check previously installed flagging and staking of environmental resources well ahead of the contractor to make sure resource exclusion areas are properly marked for avoidance.

PROJECT CHANGES

No project changes.



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AGENCY DELIVERABLES

The Historic Resources Treatment Plan was submitted to CPUC, Bureau Indian Affairs (BIA), BLM, and Caltrans. Stantec currently working to revise comments received back from CPUC and BIA.

Minor Project Refinement Requests: The following Minor Project Refinement Form requests were submitted to CPUC for review:

ZAYO MPR 16 RFI 497 MPs L97.4.5 to L97.5; Submitted February 2, 2025; Approved February 27, 2025, by Caltrans and CPUC

MONTHLY PUBLIC COMPLIANT REPORT

No public complaints recorded.



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ATTACHMENT A. REPRESENTATIVE PHOTOGRAPHS



Figure 1. View of bridge hanging operations in the Northern Area (Modoc County).



Figure 2. View of bridge hanging operations in the Central Area (Lassen County).



Figure 3. View of bore and tie-in operations in Central Area (Lassen County).

Stantec

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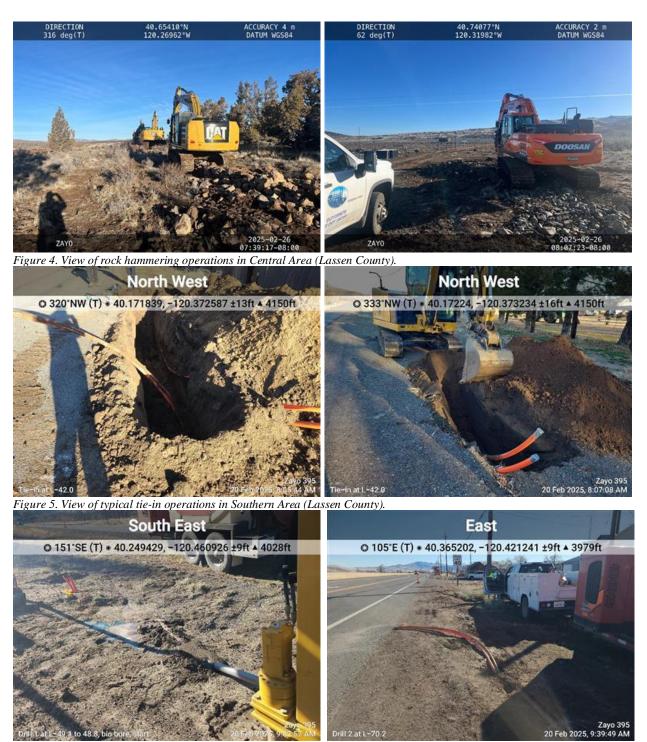


Figure 6. View of typical bore operations in Southern Area (Lassen County).



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Figure 7. View of typical bore operations in Southern Area (Lassen County).



Figure 8. Examples of ground disturbing activities in Lassen County for February 2025: (A) vault excavating at L-27.6, facing northwest; (B) excavation spoils from L-26.2, facing east; (C) vault excavating at L-27.2, facing southwest; (D) completed and backfilled vault excavation at L-27.2, facing northwest.

APPENDIX D

Zayo Minor Project Refinement Requests/Approvals, February 2025

ZAYO'S PRINEVILLE TO RENO PROJECT CPUC MINOR PROJECT REFINEMENT FORM

[with instructions]

Minor Project refinements are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact based on criteria used in the SB156 Exemption Report, create a new significant impact, are located within the geographic boundary of the study area of the SB156 Exemption Report, and that do not conflict with any environmental measure or applicable law or policy.

Date Requested:	Report No.:
7 February 2025	16
Date Approved: 2/27/2025	Approval Agency: Project Resident Engineer for Caltrans, in addition to CPUC
Property Owner(s):	Location/Milepost:
Caltrans	MPs L97.4.5 to L97.5
Land Use/Vegetative Cover:	Sensitive Resources:
Ruderal (maintained highway shoulder	Requested changes result in better avoid
near edge of pavement)	impacts to trees

Modification From:

The contractor has requested to shift the alignment of the fiberoptic line between MPs L97.4.5 to L97.5 to avoid a steep rocky slope. The inspector and contractor walked the entire section to determine the distance from the edge of the pavement to each side of the bore, which is 30 ft from EOP at Sta. 966+80 and 55 ft from EOP at Sta. 970+30. These adjustments will facilitate the construction of this segment.

Describe how Project refinement deviates from current Project. Include photos.

What to include in this section:

- <u>Original Condition</u>: A concise description of the existing condition as it is originally described and approved (NTP, engineering specifications, Final EA/ISMND, etc.)—i.e., how did the applicant originally intend to build this/do this?
- <u>Justification for change</u>: A concise description of and justification for the change requested i.e., what happened to make the change necessary?
 - These descriptions should be detailed enough and include enough background so that a person unfamiliar with the Project should be able to follow the narrative about what the original plan was and why the new plan is needed instead
 - The description should be in layman's terms to the extent possible. Be as specific as possible. The more vague the language, the more conditions may need to be added to account for omissions. Avoid logic leaps
- <u>Maps and Figures</u>: The exact location(s)/Project component(s) the change will affect. Include dimensions, if applicable. A map and/or figure is usually extremely helpful. Make sure the map is at a readable scale. Ideally, the map should be based on the most current Project map and show other Project components, survey areas, underlying topography, etc.
- <u>Environmental Impact</u>: Demonstrate that the applicant has considered how this change will affect environmental/cultural resources. List EMs, plans, permits, etc. that were reviewed in order to ensure that this change will not result in significant impacts
 - Include analyses demonstrating that projected impacts will not be significant (e.g., narrative justification, tables, figures, calculations, etc.). Base this analysis on what was previously analyzed in the NTP, SB156 Exemption Report, etc.
- <u>Concurrence (if appropriate)</u>: Demonstrate that the applicant has considered whether other agencies, municipalities, utilities, etc. would need to provide concurrence with this MPM. If so, either provide anticipated contact/approval schedule, or provide dates/contact reports/emails with approvals.

Resources:					
Biological	□ No Resources Present	Resources Present	N/A, Change would not affect resources		
Previous Biologi	cal Survey Report Refere	ence:			
Stantec conducted botanical surveys from May to August of 2019 and April to August 2020, capturing bloom periods of all target species. Stantec biologists conducted a wildlife reconnaissance of the Action Area, including a visual inspection of lands adjacent to the Action Area, during September 2019. A round of pre-construction surveys in 2024 has been completed during resource flagging. Another will occur prior to construction in the subject area.					
Cultural	No Resources Present	Resources Present	N/A, changes would not affect resources		
Previous Cultura	al Survey Report Referen	ce:			
The APE, defined in the subject area as Caltrans ROW, was surveyed by Stantec archaeologists in June and July 2020. The proposed new alignment was surveyed in 2025 during resource flagging.					
Disturbance Acr	eage Changes:	Yes 🔲 No			
Original disturbance acreage:		New disturbance acreage:			

SB156 Exemption Report Section	Applicable	(Y) Define potential impact or (N) briefly explain why SB 156 Exemption Report section isn't applicable. If (Y), describe original and new level of impact, and environmental measures to be taken. [Add notes to specify whether agency consultation is necessary, and if so, provide brief summary of that consultation.]
Geology, Soils, and Seismic	□ Yes	No change in risk of impacts to geology, soils, and seismic resources.
	No Yes	
Agency Consultation?	■ Tes	-
Hazardous		
Materials and Waste	□ Ies	No additional hazardous materials or waste produced by proposed change.
Agency Consultation?	□ Tes	-
	Yes	
Hydrology		Proposed change will decrease the potential for impacts to wetland resources.
Agency		
Consultation?	■ No	-
	Yes	
Cultural Resources	No	No cultural resources known to occur in the area affected by the change.
Agency	□ Yes	
Consultation?	🔳 No	
Traffic and	Yes	
Circulation	🗆 No	Construction closer to road shoulder may require lane closure and traffic control.
Agency	I Yes	
Consultation?	🗆 No	Consult with Caltrans regarding need for lane closure and traffic control.
Air Quality	□ Yes	No obtained at imposed to air sublity sourced by pressond aboves
	🔳 No	No alteration of impacts to air quality caused by proposed change.
Agency	□ Yes	
Consultation?	No	
Noise and Vibration	□ Yes	No increase in noise and vibration caused by proposed change.
Vibration	No No	The increase in hoise and vibration caused by proposed change.
Agency Consultation?	□ Yes	
	No No	
Aesthetics/ Visual Resources	□ Yes	No increase in impact to visual resources resulting from the change.
	No No	The includes in impact to violar resources resulting norm the orlange.
Agency Consultation?	□ Yes	4
	No No	
Vegetation and Wildlife	Yes	Will decrease potential for impacts to vegetation and wildlife associated with wetlands.
	🗆 No	
Agency Consultation?	□ Yes	
- 51120110111	No	

Approvals	Date	Name (print)	Signature	
Zayo Project Manager	2/7/25	Dan Barcomb	Dan Barcomb Barcomb	 Reviewed
CPUC Project Manager	2/27/25	Connie Chen	Connie Digitally signed by Connie Chen Date: 2025.02.28 11:20:11 -08'00'	 Approved with conditions (see below) Denied

For CPUC Compliance Manager Use Only		
Refinement Approved Refinement Denied		Beyond Authority

Conditions of Approval or Reason for Denial:	
The applicable Conditions of Approval from the Pr Compliance, and Reporting Program apply to this	
Prepared by: ECORP Consulting, Inc.	Date: 2/27/25

RFI No. 497

Summary: The contractor has requested to shift the alignment of the fiberoptic line between MP L97.4.5-L97.5 to avoid a steep rocky slope. The inspector and contractor walked the entire section to determine the distance from the edge of the pavement to each side of the bore, which is 30 ft from EOP at Sta. 966+80 and 55 ft from EOP at Sta. 970+30. These adjustments will facilitate the construction of this segment.



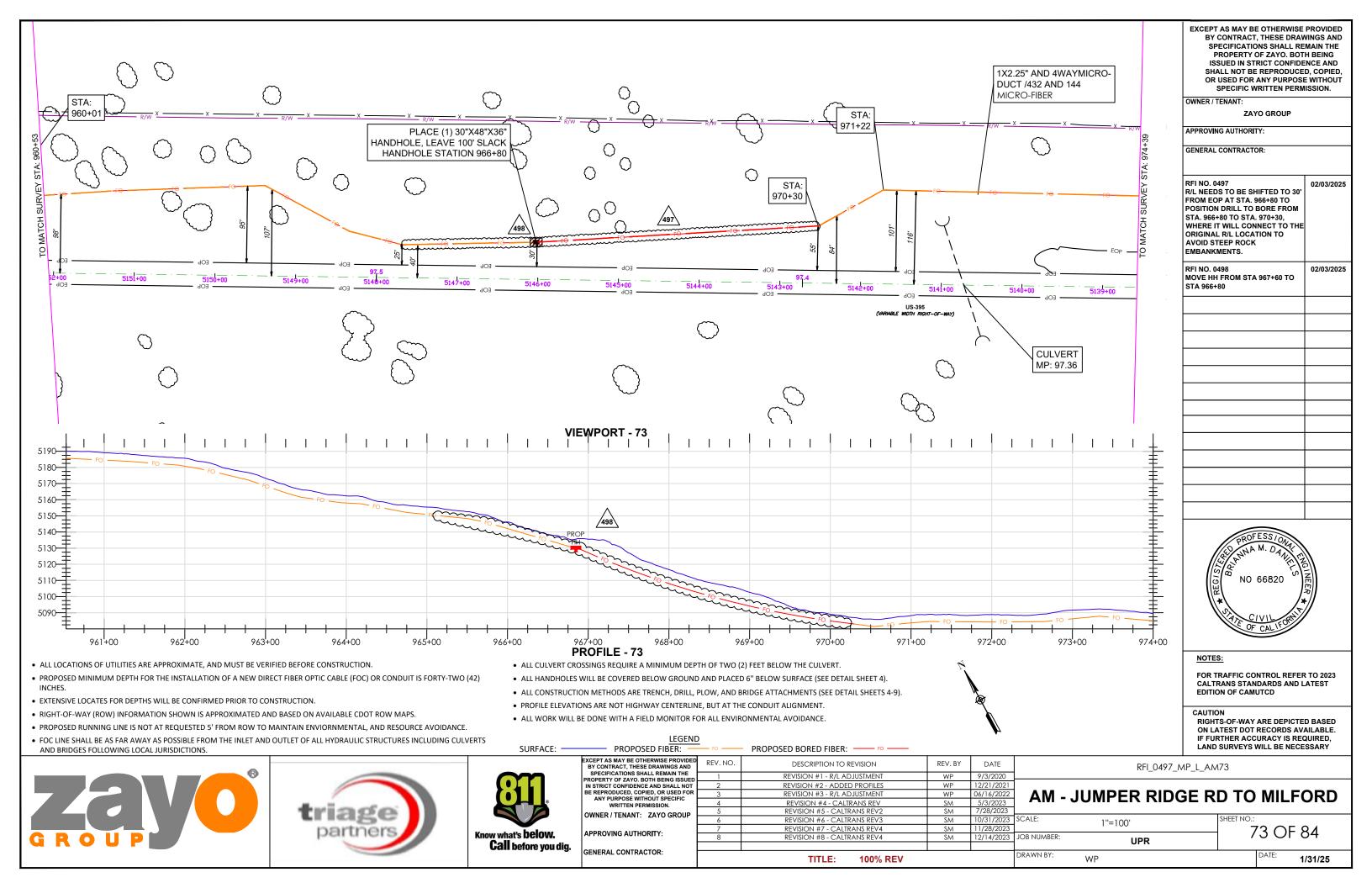
schedule: This section will be constructed upon approvals from CPUC and Caltrans.

RE Review:

- Maintenance No change to maintenance
- Design Design will change for plowing to bore.
- Environmental No additional impacts

RE Recommendation:

Based on my review, I support approval of this RFI.



APPENDIX E

Zayo Project Non-Compliance Reports, February 2025

No Non-Compliance Reports were received.

APPENDIX F

ECORP Daily Compliance Monitoring Reports, February 2025

ZAYO PRINEVILLE TO RENO PROJECT CPUC SITE INSPECTION FORM

Project:	Zayo Prineville To Reno	Date:	2/19/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:		Monitor(s):	Daniel Tomasello
CPUC PM:		AM/PM Weather:	
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□n/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	□Yes	□No	■N/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	\Box N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□n/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□n/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□N/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□n/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	■No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	∎No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	• Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□n/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	■No	□n/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□n/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□N/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED
One rock hammer crew and plow crew continued work between MP 102.6 and 102.4. Two rock hammers and plow near MP 100.0.
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or
concern, construction activity, any discussions with first-party monitors or construction crews) Attempted to find bridge hang crew near Alturus but crew was not present. Caught up
with middle plow and rock hammer crew near MP 102.6.
Monitored two rock hammers and plow just up 395 near MP 100.0
All required paleo and cultural monitors were on site.
ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on
Ems pertinent to your observations today)
Bio - 8
Bio - 10 Bio - 14
Bio - 15
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)

COMPLIANCE SUMMARY

Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

PREVIOUS NONCOMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
			1		
]		

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description	

Completed by:	
Firm:	
Date:	

Reviewed by:	
Firm:	
Date:	



ZAYO PRINEVILLE TO RENO PROJECT CPUC SITE INSPECTION FORM

Project:	Zayo Prineville To Reno	Date:	2/25/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 44 - 62 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□n/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	•No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED Tie-in crew.

Mile Marker L-R 23.1

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) Transport and initiation of excavation at new tie-in location.

ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on Ems pertinent to your observations today) HAZ-1, CUL-1, BIO-15, BIO-14, BIO-8

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)

COMPLIANCE SUMMARY

_

Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

PREVIOUS NONCOMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
2/25/25	L-R 23.1		Tie-in with backfill ready			

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
			1		
]		

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description	

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



Project:	Zayo Prineville To Reno	Date:	2/25/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 44 - 62 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□N/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	•No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED Tie-in crew.

Mile Marker L-25.2 to L-27.6

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) Tie-in crew transporting and commencing new pit.

ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on Ems pertinent to your observations today) HAZ-1, CUL-1, BIO-15,m BIO-14, BIO-8, PALEO-2

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)

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Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
2/25/25	L-25.2		Completed area			
	L-27.6		Commence excavation			

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
			1		
]		

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description	

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



Project:	Zayo Prineville To Reno	Date:	2/25/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 44 - 62 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□N/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	•No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□n/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED Drill spread.

Mile Marker L-R71.2

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DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) Drill spread and supporting equipment.

ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on Ems pertinent to your observations today) HAZ-1, BIO-15, BIO-14, BIO-8

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)

_

Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		

REPRESI	ENTATIVE	SITE PHOTOGRAPHS	
Date	Location	Photo	Description
2/25/25	L-R71.2		Drill spread
	L-R71.2		Drill spread

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description	

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



Project:	Zayo Prineville To Reno	Date:	2/25/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 44 - 62 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	\Box N/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□N/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	■No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED Drill spread.

Mile Marker L-72.6

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DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) Drill spread and supporting equipment.

ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on Ems pertinent to your observations today) HAZ-1, BIO-15, BIO-14, BIO-8

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)

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Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
2/25/25	L-72.6		Turnout drill spread.			
	L-72.6		Slurry capture.			

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
			1		
]		

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



Project:	Zayo Prineville To Reno	Date:	2/25/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 44 - 62 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	\Box N/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□N/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	■No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

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PROJECT FACLITIES AND FEATURES MONITORED
Rock hammer, plow, and excavator spread.
Mile Marker L-97.4
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or
concern, construction activity, any discussions with first-party monitors or construction crews)
Rock hammers clearing for pre-plow with excavator backfill and compaction
operations.
ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on
Ems pertinent to your observations today)
HAZ-1, CUL-1, BIO-15, BIO-14, BIO-8, PALEO-2
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
-
COMPLIANCE SUCCESTIONS OF A DDITIONAL ODSERVATIONS (i
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)
-

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Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

Date	Location	SITE PHOTOGRAPHS Photo	Description
2/25/25	L-97.4		Compacted area
	L-97.4		In-progress area
	L-97.4		Full operational equipment spread

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
			1		
]		

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



Project:	Zayo Prineville To Reno	Date:	2/26/25	
Project Proponent:	Zayo Group, LLC	Report #:		
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell	
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 39 - 58	
Project NTP(s):				

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□n/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	■No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

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PROJECT FACLITIES AND FEATURES MONITORED
Rock hammer, plow, and excavator spread.
Mile Marker L-97.4
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or
concern, construction activity, any discussions with first-party monitors or construction crews)
Rock hammers clearing for pre-plow with excavator backfill and compaction
operations.
ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on
Ems pertinent to your observations today)
HAZ-1, CUL-1, BIO-15, BIO-14, BIO-8, PALEO-2
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
-
COMBILANCE SUCCESTIONS OF A DDITIONAL ODSEDVATIONS (:
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)
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Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
2/26/25	L-97.4	NW 20	Hammer operation area
	L-97.4	NE E N SE 120 SE 120 C SE 120	In-progress area

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS		
Date	Location	Photo	Description
			1
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REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS		
Date	Location	Photo	Description

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



ZAYO PRINEVILLE TO RENO PROJECT CPUC SITE INSPECTION FORM

Project:	Zayo Prineville To Reno	Date:	2/26/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 39 - 58 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□N/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□N/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	■No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED Drill spread.

Mile Marker L-R71.2

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DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) Drill spread and supporting equipment.

ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on Ems pertinent to your observations today) HAZ-1, BIO-15, BIO-14, BIO-8

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)

COMPLIANCE SUMMARY

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Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

PREVIOUS NONCOMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

		SITE PHOTOGRAPHS	
Date	Location	Photo	Description
2/26/25	L-R71.2	SE 120 SE 120 S 1212m © 154'SE (T) ● 40.367431, -120.402399 ±2m ▲ 1212m © 154'SE (T) ● 40.367431, -120.402399 ±2m ▲ 1212m © 164'SE (T) ● 40.367431, -120.402399 ±2m ▲ 1212m	Drill spread
	L-R71.2	SW sp	Conduit being pulled back

REPRES	REPRESENTATIVE SITE PHOTOGRAPHS		
Date	Location	Photo	Description
			1
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REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS		
Date	Location	Photo	Description

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



ZAYO PRINEVILLE TO RENO PROJECT CPUC SITE INSPECTION FORM

Project:	Zayo Prineville To Reno	Date:	2/26/25
Project Proponent:	Zayo Group, LLC	Report #:	
Lead Agency:	CPUC	Monitor(s):	Jedidiah Dowell
CPUC PM:		AM/PM Weather:	Partly cloudy, light to gusty wind, approx. 39 - 58 F
Project NTP(s):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?	• Yes	□No	□n/A
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	• Yes	□No	□N/A
Are erosion and sediment control measures properly installed and functioning?	□Yes	□No	■N/A
Is mud tracked onto paved public roadways cleaned up in accordance with the Project's SWPPP?	• Yes	□No	□n/A
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	□Yes	□No	■N/A
Are work areas being effectively watered prior to excavation or grading?	• Yes	□No	□N/A
Is excessive fugitive dust leaving the work area?	□Yes	■No	□N/A
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	• Yes	□No	□N/A
Are all vehicles/equipment observed arriving on-site clean of sediment or plant debris?	• Yes	□No	□N/A
Are vehicles/equipment turned off when not in use?	• Yes	□No	□N/A
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	• Yes	□No	□n/A
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	• Yes	□No	□n/A
Are all excavations and trenches covered at the end of the day?	• Yes	□No	□n/A
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	□Yes	□No	■N/A
Biology			
Have pre-construction surveys been completed for biological resources as appropriate?	• Yes	□No	□n/A

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Are biological monitors present on-site?	• Yes	□No	□N/A
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	• Yes	□No	□n/A
Have wildlife been relocated from work areas?	□Yes	•No	□n/A
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?	□Yes	■No	□n/A
Were any threatened or endangered species observed? If yes, list observations below:			
	□Yes	■No	□n/A
Are there wetlands or water bodies present near construction activities?	□Yes	■No	□n/A
Have there been any work stoppages for biological resources?	□Yes	■No	□n/A
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?	∎Yes	□No	□n/A
Are archaeological and paleontological monitors on-site if needed?	• Yes	□No	□N/A
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?	• Yes	□No	□N/A
Have there been any work stoppages for cultural/paleo resources?	□Yes	■No	□N/A
Hazardous Materials			
Are hazardous materials stored appropriately?	• Yes	□No	□n/A
Are procedures in place to prevent spills and accidental releases?	• Yes	□No	□n/A
Are appropriate fire prevention and control measures in place?	• Yes	□No	□n/A
Is contaminated soil properly handled or disposed of, if applicable?	□Yes	□No	■N/A
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	□Yes	□No	■N/A
Is construction occurring within approved hours?	• Yes	□No	□n/A
Are noise control measures in place within 100 feet of sensitive receptors as needed?	□Yes	□No	■N/A

PROJECT FACLITIES AND FEATURES MONITORED Backfill
Mile Marker L-42.5
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) Backfill of tie-in pit.
ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on Ems pertinent to your observations today)
-
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
-
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note)
-

COMPLIANCE SUMMARY

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Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.

 \Box New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc.

 \Box Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.

□New noncompliance issues reported by Zayo monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include Zayo report identification number.

PREVIOUS NONCOMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESE	ENTATIVE	SITE PHOTOGRAPHS	
Date	Location	Photo	Description
2/26/25	L-42.5	NW NE • 1 °N (T) • 40.176783, -120.380401 ±3m ▲ 1256m	Backfilling, compacted area

Date	Location	Photo	Description
			1
			7

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description

Completed by:	Jedidiah Dowell
Firm:	ECORP Consulting, Inc.
Date:	2/26/25

Reviewed by:	
Firm:	
Date:	



APPENDIX G

Additional Zayo Project Management Plan Approvals, February 2025 No additional Project Management Plans were received.