

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.*

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| <b>Date Requested:</b><br>24 June 2025   | <b>Report No.:</b><br>21/RFI 514  |
| <b>Date Approved:</b><br>07/28/2025  | <b>Approval Agency:</b><br>CPUC<br>Caltrans (approval pending)  |
| <b>Property Owner(s):</b><br>Caltrans  | <b>Location/Milepost:</b><br>MP M7.9 - M9.2   |
| <b>Land Use/Vegetative Cover:</b><br>Ruderal (maintained highway shoulder near edge of pavement) | <b>Sensitive Resources:</b><br>Requested changes result in better avoidance of surface cultural artifacts on original running line. |

Modification From:

☐ Permit    ☒ Plan/Procedure    ☐ Specification    ☐ Drawing    ☐ Environmental Measure    ☐ Other

RFI 514 dovetails with RFI 513 (submitted 12 June 2025, pending approval).

RFI 513: From MP M9.2 to M9.4, move the running line to 25 ft from edge of pavement on the west side of US 395. Cross road at sta. 639+77 & back to east side at 629+46. Bore under driveway from sta. 639+00 to 637+40 and under culvert at MP 9.35. The intent is to avoid a linear wetland feature on the east side of the ROW paralleling US 395.

RFI 514: From MP M7.9 to M9.2, move the running line to 10-20 ft from edge of pavement from current alignment along fence line to avoid surface cultural materials, per Pit River Tribes' request.

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

What to include in this section:

- **Original Condition:** 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?
- **Justification for change:** 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
- **Maps and Figures:** 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.
- **Environmental Impact:** 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.
- **Concurrence (if appropriate):** 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.

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|---|---|---|--|
| <b><u>Resources:</u></b>  |   |   |  |
| <b>Biological</b>   | <input type="checkbox"/> No Resources Present | <input checked="" type="checkbox"/> Resources Present | <input type="checkbox"/> N/A, Change would not affect resources  |
| <b>Previous Biological Survey Report Reference:</b><br>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. A wetland addressed in RFI 513 will be avoided. |   |   |  |
| <b>Cultural</b>   | <input type="checkbox"/> No Resources Present | <input checked="" type="checkbox"/> Resources Present | <input type="checkbox"/> N/A, changes would not affect resources |
| <b>Previous Cultural Survey Report Reference:</b><br>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. The change avoids surface cultural materials in the original alignment at the fence line.  |   |   |  |
| <b><u>Disturbance Acreage Changes:</u></b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |   |   |  |
| Original disturbance acreage: 2.36 acres  |   | New disturbance acreage: No significant change.       |  |

| <b>SB156<br/>Exemption<br/>Report Section</b> | <b>Applicable</b>                       | <b>(Y) Define potential impact or (N) briefly explain why SB 156<br/>Exemption Report section isn't applicable. If (Y), describe<br/>original and new level of impact, and environmental measures<br/>to be taken. [Add notes to specify whether agency consultation is<br/>necessary, and if so, provide brief summary of that consultation.]</b> |
|---|---|--|
| Geology, Soils,<br>and Seismic                | <input type="checkbox"/> Yes            | No change in risk of impacts to geology, soils, and seismic resources.   |
|   | <input checked="" type="checkbox"/> No  |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Hazardous<br>Materials and<br>Waste           | <input type="checkbox"/> Yes            | No additional hazardous materials or waste produced by proposed change.  |
|   | <input checked="" type="checkbox"/> No  |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Hydrology                                     | <input checked="" type="checkbox"/> Yes | Proposed change in RFI 513 decreases the potential for impacts to wetlands.  |
|   | <input type="checkbox"/> No             |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Cultural Resources                            | <input checked="" type="checkbox"/> Yes | Proposed change avoids surface cultural materials between MP M7.9 and M9.2.  |
|   | <input type="checkbox"/> No             |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Traffic and<br>Circulation                    | <input checked="" type="checkbox"/> Yes | Construction near road shoulder may require lane closure and traffic control.  |
|   | <input type="checkbox"/> No             |  |
| Agency<br>Consultation?                       | <input checked="" type="checkbox"/> Yes | Consult with Caltrans regarding need for lane closure and traffic control.   |
|   | <input type="checkbox"/> No             |  |
| Air Quality                                   | <input type="checkbox"/> Yes            | No alteration of impacts to air quality caused by proposed change.   |
|   | <input checked="" type="checkbox"/> No  |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Noise and<br>Vibration                        | <input type="checkbox"/> Yes            | No increase in noise and vibration caused by proposed change.  |
|   | <input checked="" type="checkbox"/> No  |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Aesthetics/<br>Visual Resources               | <input type="checkbox"/> Yes            | No increase in impact to visual resources resulting from the change.   |
|   | <input checked="" type="checkbox"/> No  |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |
| Vegetation and<br>Wildlife                    | <input checked="" type="checkbox"/> Yes | Reroute to near EOP will decrease impacts to native vegetation.  |
|   | <input type="checkbox"/> No             |  |
| Agency<br>Consultation?                       | <input type="checkbox"/> Yes            |  |
|   | <input checked="" type="checkbox"/> No  |  |

| Approvals            | Date    | Name (print)    | Signature         |   |
|----------------------|---------|-----------------|-------------------|---|
| Zayo Project Manager |         |                 |                   | <input checked="" type="checkbox"/> Reviewed  |
| CPUC Project Manager | 7/28/25 | Ruchita Acharya | <i>R. Acharya</i> | <input checked="" type="checkbox"/> Approved with conditions (see below)<br><input type="checkbox"/> Denied |

| For CPUC Compliance Manager Use Only                    |  |   |
|---|--|---|
| <input checked="" type="checkbox"/> Refinement Approved | <input type="checkbox"/> Refinement Denied | <input type="checkbox"/> Beyond Authority |

|  |               |
|--|---------------|
| <p><b><u>Conditions of Approval or Reason for Denial:</u></b></p> <p>The applicable Conditions of Approval from the Project Conditions, Monitoring, Compliance, and Reporting Program apply to this request.</p> <p>Evidence of Caltrans approval to be supplied by CPUC prior to construction in this area.</p> |               |
| Prepared by: ECORP Consulting, Inc.  | Date: 7/28/25 |