# 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.

Approval Agency: CPUC (Caltrans approval pending - RFI 506)  Location/Milepost: MP M4 - M7.9		
CPUC (Caltrans approval pending - RFI 506)  Location/Milepost:		
CPUC (Caltrans approval pending - RFI 506)  Location/Milepost:		
(Caltrans approval pending - RFI 506)  Location/Milepost:		
•		
MP M4 - M7.9		
Sensitive Resources:		
Requested changes result in avoidance cultural resources.		
Duraning		
Drawing □ Environmental Measure □ (		
-		

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

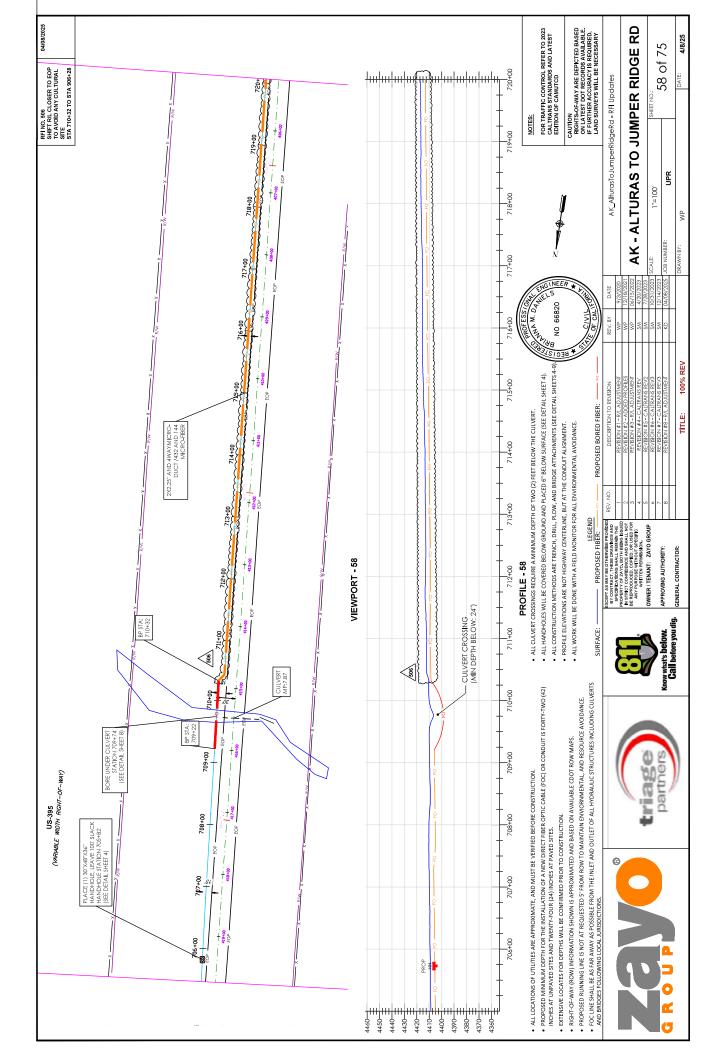
## What to include in this section:

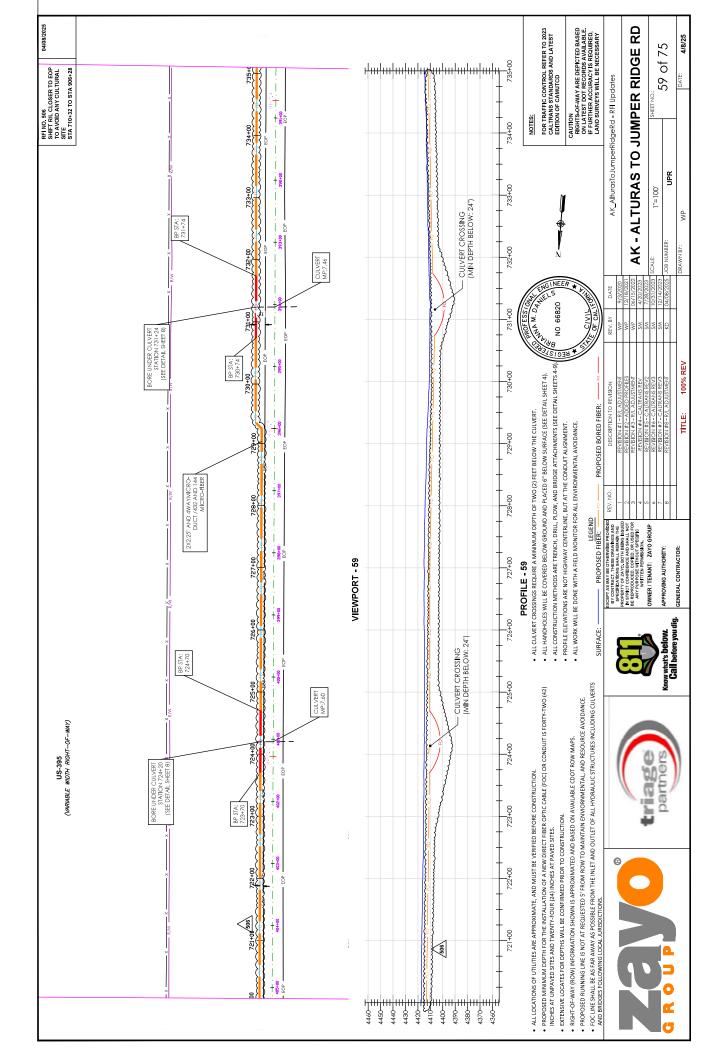
- <u>Original Condition</u>: A concise description of the existing condition as it is originally described and approved (NTP, engineering specifications, Final EA/ISMND, etc.)—i.e., how did the applicant originally intend to build this/do this?
- <u>Justification for change</u>: A concise description 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
- 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.
- <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.

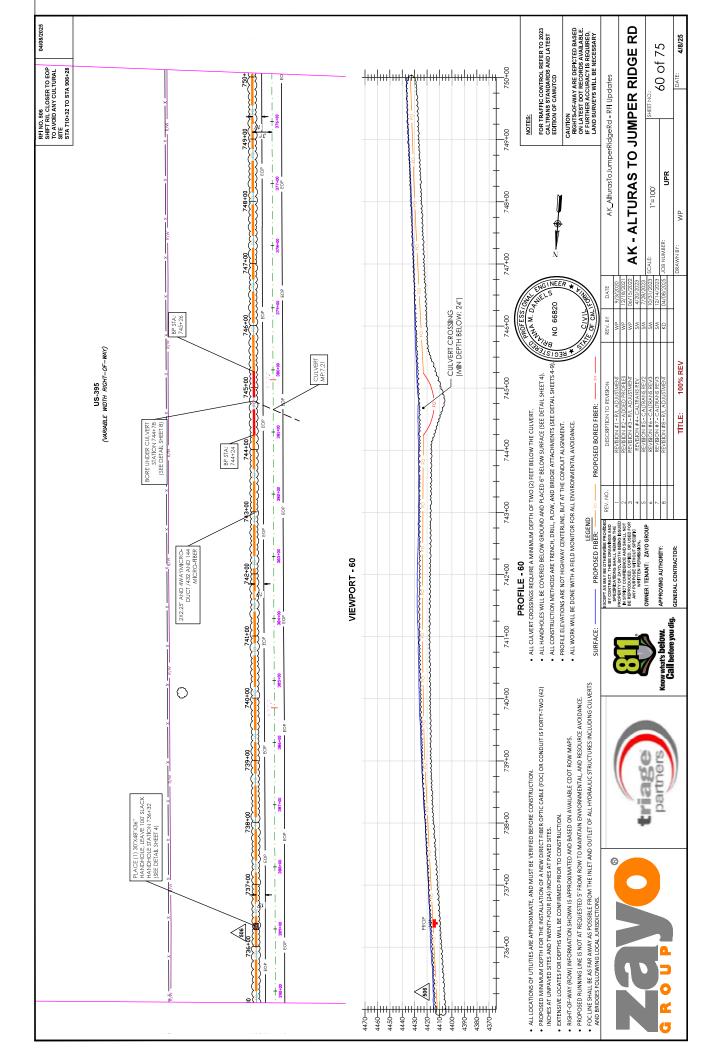
Resources:									
Biological	☐ No Resources Present	☐ Resources Present	■ N/A, Change would not affect resources						
Previous Biological Survey Report Reference:									
Stantec conducted botanical surveys from May to August of 2019 and April to August 2020, capturing bloom periods of all target 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. Mapped biological ressources will still be avoided with the proposed change.									
Cultural	☐ No Resources Present	Resources Present	☐ N/A, changes would not affect resources						
Previous Cultural Survey Report Reference:									
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 proposed change to near EOP is to better avoid cultural resources.									
<b>Disturbance Acreage Changes:</b> ☐ Yes <b>■</b> No									
Original 7.6 a disturbance acreage:	acres	New disturbance acreage: No sign	nificant change.						

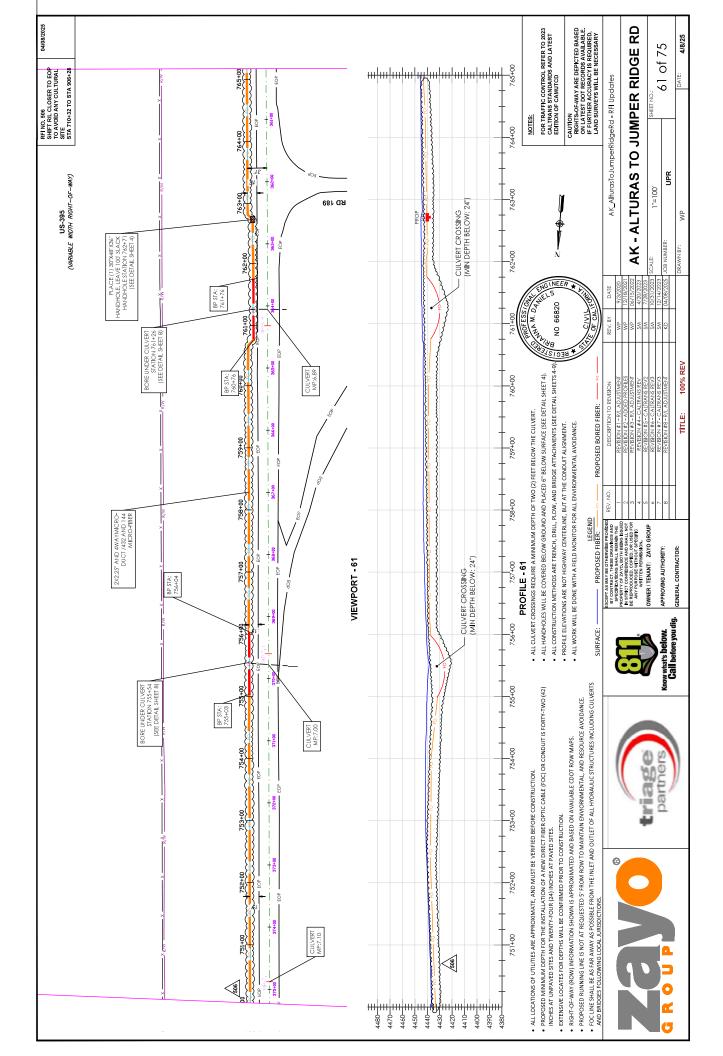
SB156 Exemption Report Section	Applicable	(Y) Define potential impact or (N) briefly explain why SB 156 Exemption Report section isn't applicable. If (Y), describe original and new level of impact, and environmental measures to be taken. [Add notes to specify whether agency consultation is necessary, and if so, provide brief summary of that consultation.]	
Geology, Soils, and Seismic	□ Yes ■ No	No change in risk of impacts to geology, soils, and seismic resource	
Agency Consultation?	☐ Yes ■ No		
Hazardous Materials and	□ Yes	No additional hazardous materials or waste produced by proposed change.	
Waste Agency	■ No □ Yes		
Consultation?	■ No ■ Yes		
Hydrology	□ No	No change to potential impacts to wetland resources.	
Agency Consultation?	☐ Yes ■ No		
Cultural Resources	■ Yes	Change proposed to better avoid cultural resources.	
Agency Consultation?	■ Yes		
Traffic and Circulation	■ Yes	Construction near road shoulder may require lane closure and traffic control.	
Agency Consultation?	■ Yes	Consult with Caltrans regarding need for lane closure and traffic control.	
Air Quality	☐ Yes ☐ No	No alteration of impacts to air quality caused by proposed change.	
Agency Consultation?	☐ Yes		
Noise and Vibration	■ No □ Yes	No increase in noise and vibration caused by proposed change.	
Agency	■ No □ Yes		
Consultation?  Aesthetics/	■ No		
Visual Resources Agency	■ No	No increase in impact to visual resources resulting from the change.	
Consultation?	■ No	-	
Vegetation and Wildlife	■ Yes	Moving coser to EOP will decrease potential impacts to vegetation and wildlife.	
Agency Consultation?	☐ Yes  ■ No		

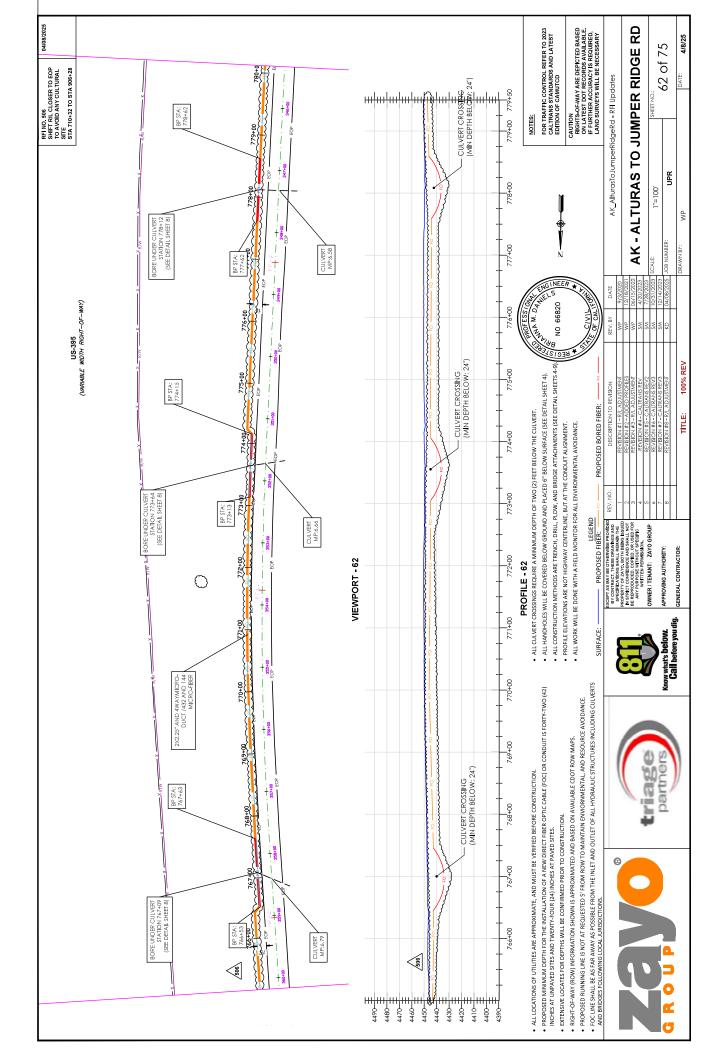
Approvals	Date	Name (print)	Sign	ature				
Zayo Project Manager		J. W. C.	, , , , , , , , , , , , , , , , , , ,		■ Reviewed			
CPUC Project Manager	7/28/25	Ruchita Acharya	R.A.ch	larya	■ Approved with conditions (see below) □ Denied			
	For CPUC Compliance Manager Use Only  ■ Refinement Approved □ Refinement Denied □ Beyond Authority							
E Remient Approved								
Conditions of Appro	val or Page	son for Daniel						
Conditions of Approval or Reason for Denial:  The applicable Conditions of Approval from the Project Conditions, Monitoring, Compliance and Reporting Program apply to this request.  Evidence of Caltrans approval to be supplied to CPUC prior to construction in this area.								
Propored by:	DD Con	culting Inc	Date: 7	128/25				
Prepared by: ECORP Consulting, Inc.  Date: 7/28/25								

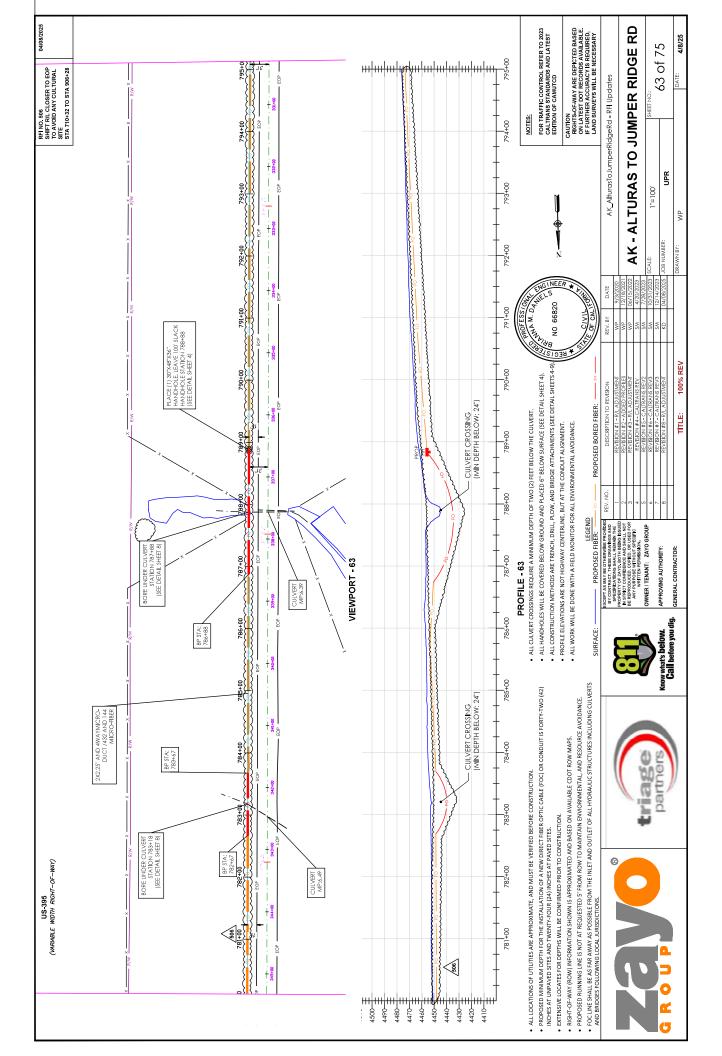


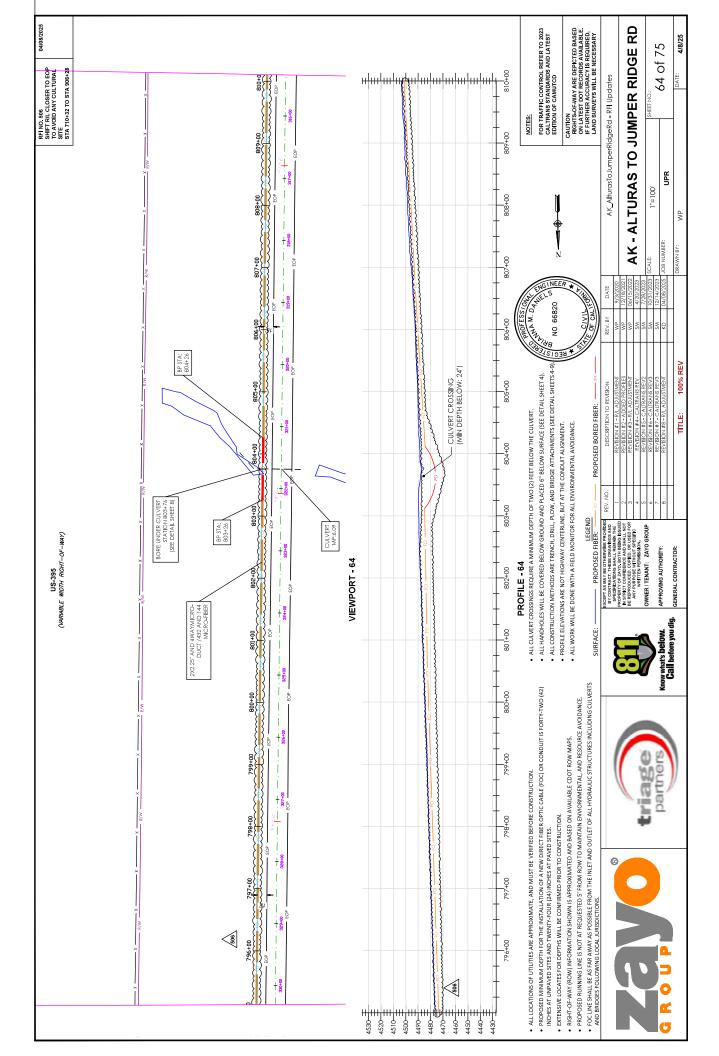


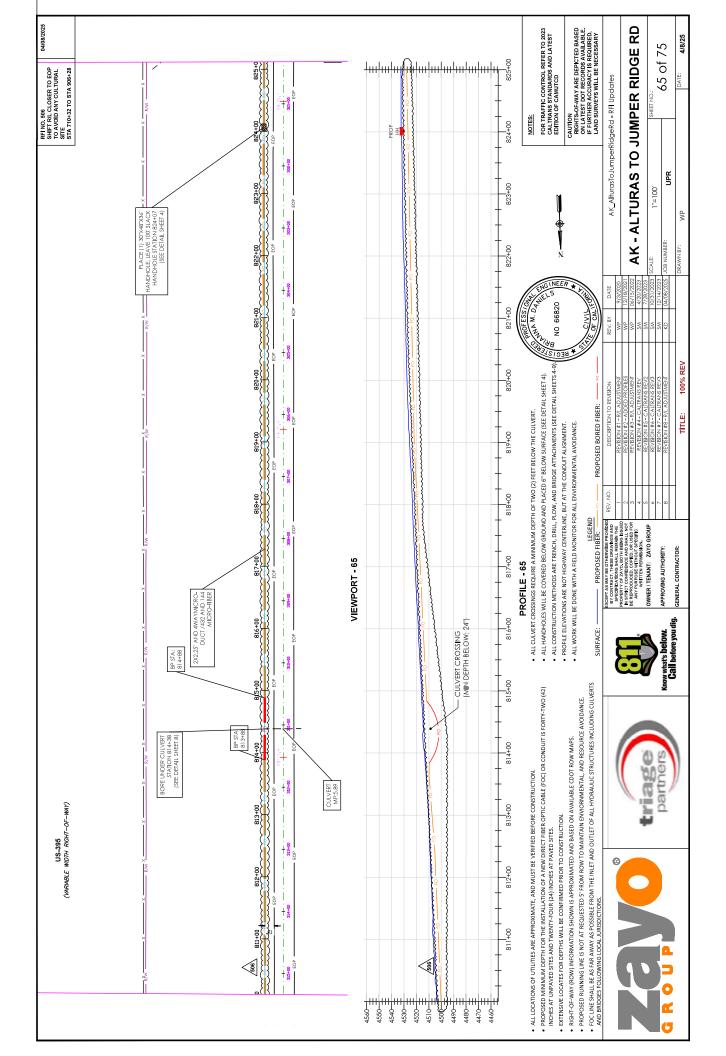


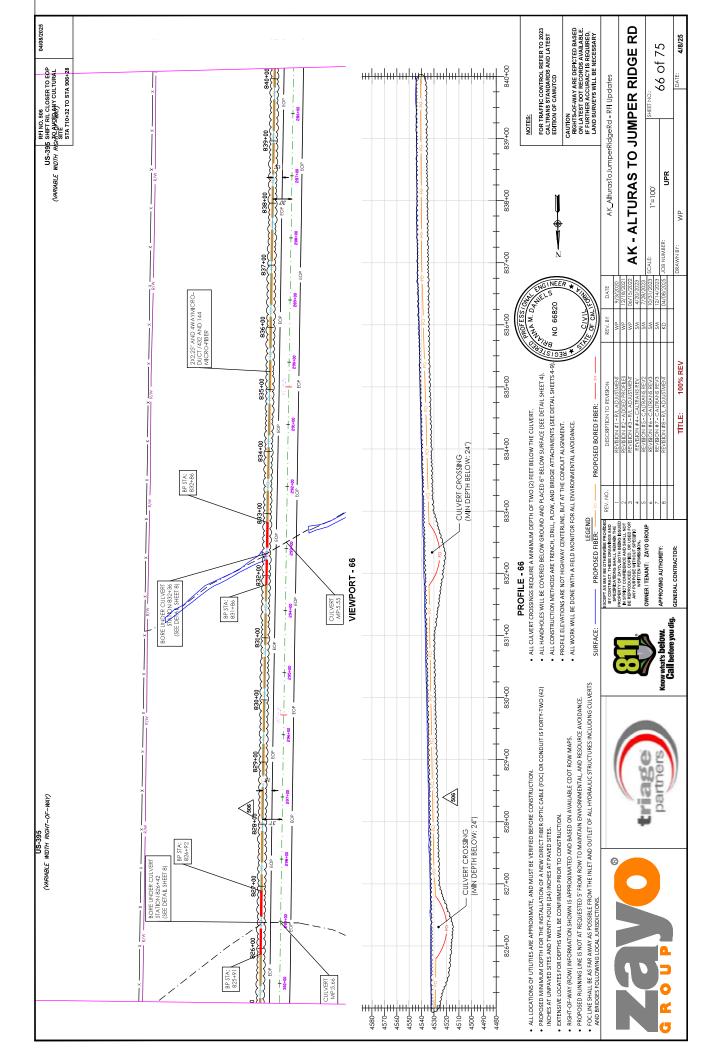


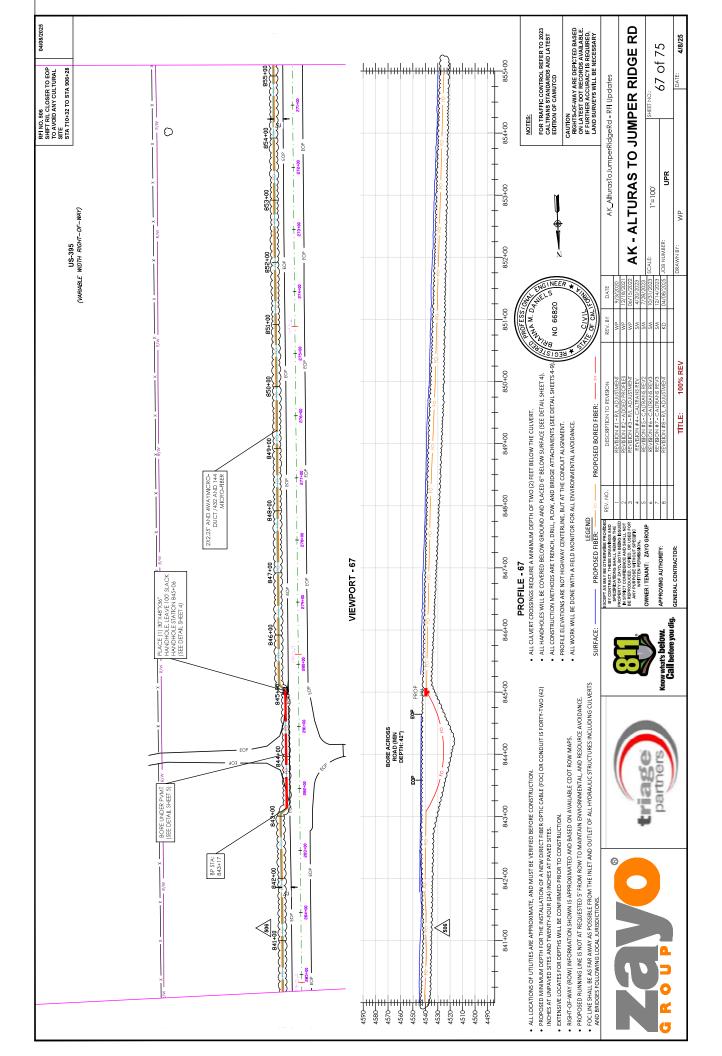


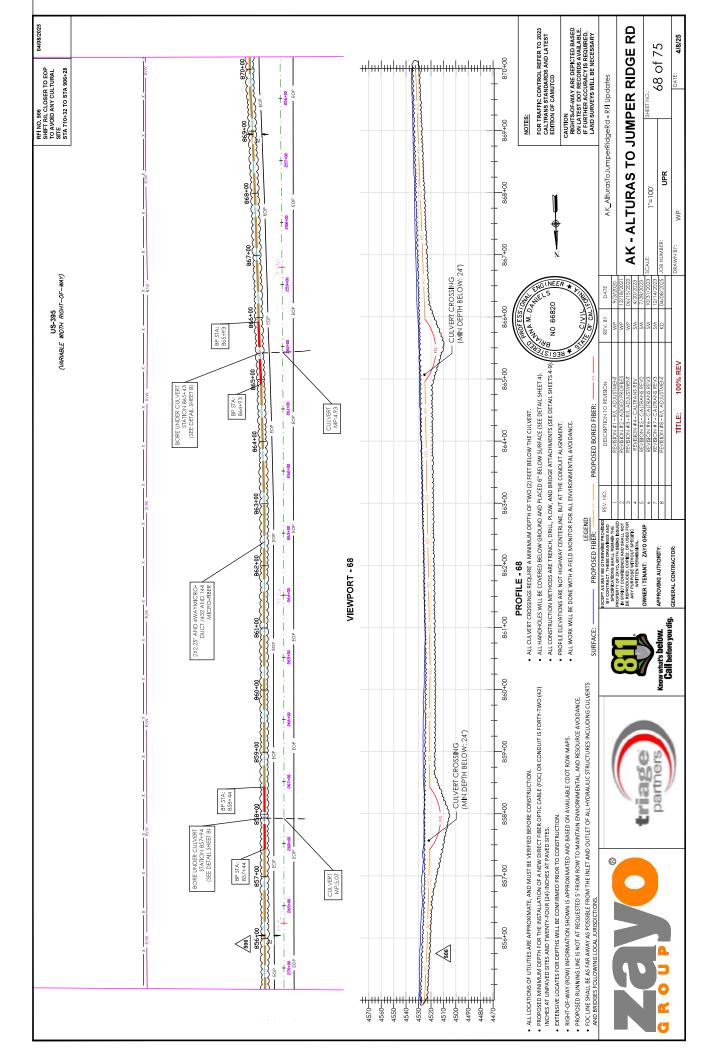


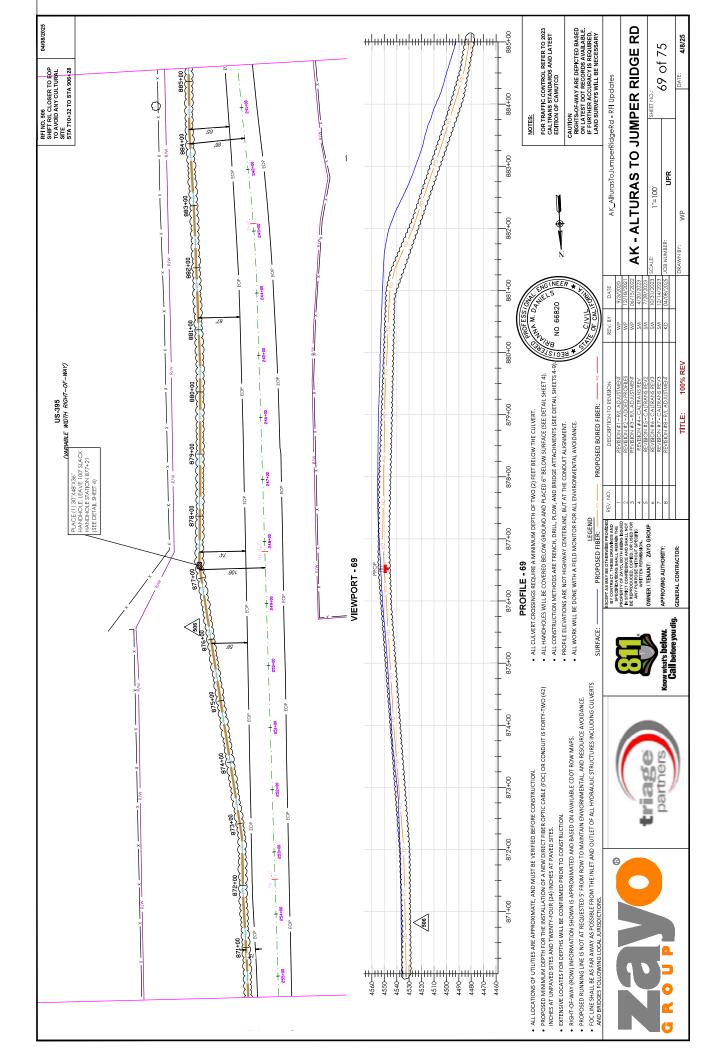


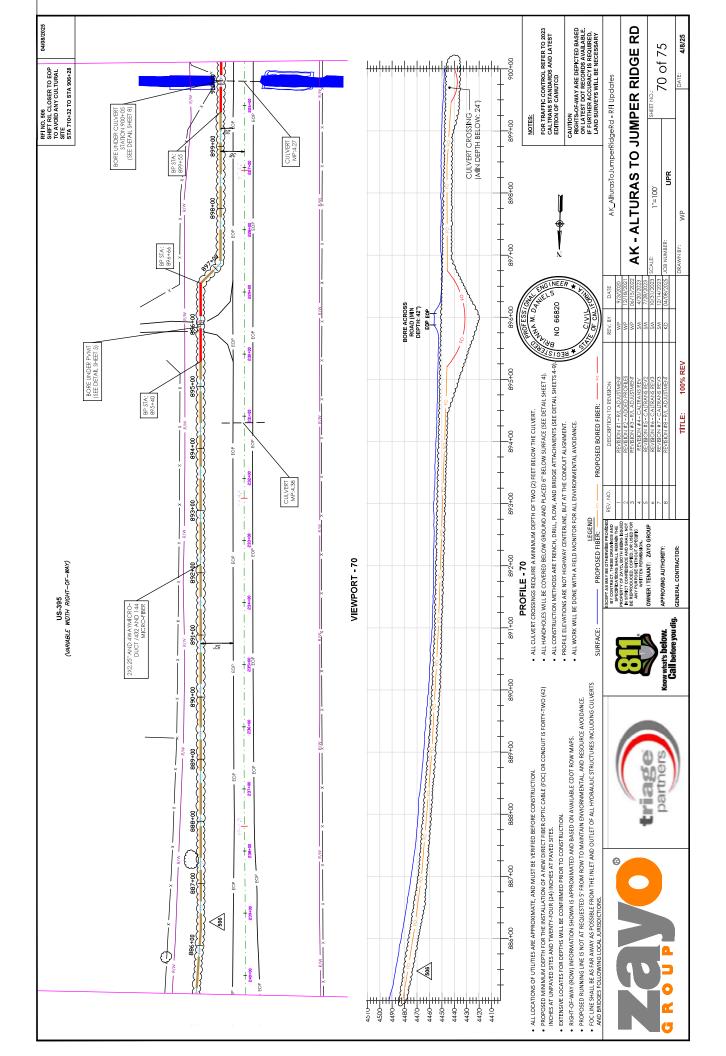


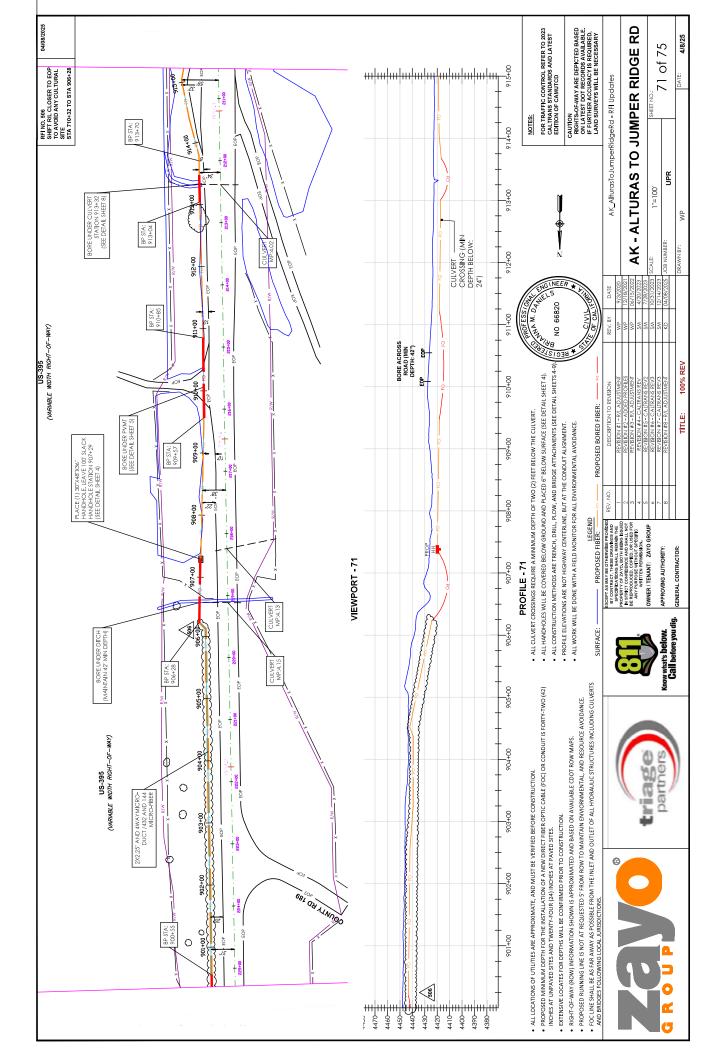
















To: Ruchita Acharya From: Erin Sherlock

Petaluma

Project/File: California Zayo Prineville to Reno Date: June 25, 2025

Reference: RFI 506: MP M4.7 - M7.8

#### Introduction

During the Zayo Prineville to Reno Fiber Optic project, Stantec cultural monitors recorded artifacts in the area of direct impacts (ADI) near site 40.13.17.01/P-25-008631/CA-MOD-008631 within lands managed by the Bureau of Land Management (BLM) Applegate Field Office (AGFO). While documenting this site, the Stantec archaeology crew identified additional archaeological sites (14 new and 3 updated including P-15-008631) along both sides of CA highway 395.

These sites were recorded, and it was recommended that the ADI be rerouted to avoid these sites. This recommendation was presented to BLM, Ecorp, and Caltrans on May 2, 2025 (attachment A)As such, Stantec recommended a finding of no adverse effect to Historic Properties within the proposed rerouted Project ADI.

# **Background**

A series of previously unidentified lithic scatters along the east and west sides of Hwy 395 within the Caltrans right-of-way were identified on November 14, 2024. This area was flagged for avoidance and a notification email was sent to the ECORP, BLM, and Caltrans archaeologists on November 14, 2025 (see Attachment A).

Following the notification, Stantec archaeologists conducted fieldwork and formally recorded these surface deposits in January 2025. Based on field results it was determined that numerous sites extended into MP 4.7-7.8. In total 14 new sites were identified, and three known sites were updated (Figure 1).

A proposed reroute was presented to BLM, Ecorp, and Caltrans on May 2, 2025 (appendix A, Figure 1)

## **Summary and Recommendations**

During formal recordation of unanticipated discoveries, Stantec identified additional sites between MP4.7-7.8. These sites were formally recorded, and the ADI was recommended to be rerouted closer to the road, outside of the site boundaries as an avoidance measure.

As such, Stantec recommends a finding of no adverse effect to Historic Properties within the Project ADI and recommends archaeological monitoring within the Project APE as an avoidance measure during construction, consistent with *Conditions Monitoring, Compliance and Reporting Program Zayo's Prineville to Reno Fiber Optic Project*.

June 24, 2025 Ruchita Acharya Page 2 of 2

Reference: RFI 514

Regards,

**Stantec Consulting Services Inc.** 

Erin Sherlock MA, RPA Senior Archaeologist Phone: (707) 782-3059 erin.sherlock@stantec.com

stantec.com

Attachment: Attachment A Communications

Attachment B Figure 1

Attachment C DPRs