

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 18, 2021

VIA EMAIL

Attn. Erik Cutright, Karuk Tribe  
CC: Penny Eckert, Enertribe

SUBJECT: Data Request for the Klamath River Rural Broadband Project  
Initial Study/Environmental Assessment

Dear Mr. Cutright:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review of the Klamath River Rural Broadband Initiative (Project), based on lead and cooperating agency input on the Administrative Draft IS/EA we have identified additional information required in order to adequately conduct the CEQA/NEPA review. The CPUC requests the following information (Data Request dated March 18, 2021) by April 2, 2021. Please confirm with the CPUC if you can meet this requested deadline.

Please do not hesitate to call me at 415.703-2124 or email: [Connie.Chen@cpuc.ca.gov](mailto:Connie.Chen@cpuc.ca.gov) if you have any questions.

Sincerely,

Connie Chen

Connie Chen  
Project Manager  
Energy Division, CEQA Unit

cc: Julie Watson, ESA  
Chad Broussard, BIA

Attachment:

1) Data Request

## Data Request 03.18.2021

1. What are the anticipated construction hours for locations within one-mile of a residence or school? [BIA, page 2-30, Section 2.6.16].

PEA 2020 (page 2-107) states: “When permitted to operate, crews will work 7 days a week, Monday through Sunday, from 6:00 a.m. until 6:00 p.m. where at least 1 mile from a residence or school, or where otherwise limited by the road manager. Note that construction hours include needed pauses for traffic to pass on various one-lane roads and for traffic control on two-lane roads where equipment must use one of the lanes for safety purposes. Hours of construction may be more limited near schools or where otherwise limited by permitting agencies.”

2. Please provide precise locations (lat./long. or UTM) for 2 new poles proposed for placement in Segment 1 (Klamath River crossing near Hwy 96 bridge). [USFS Six Rivers NF, Section 2.5.3].

3. Yurok signal connection Orleans Mountain: Forest Service communications vault and tower are at or near capacity. System “upgrades” including additional vault space room on tower for an antenna or room for any additional solar panels will require USFS review. Please provide additional details on what is proposed at this location. [USFS Section 2.5.4 page 2-12].

4. Antenna Ridge has been used in the past as a TV translator site but presently there is no authorized use on the site. The site needs to have a qualified heritage specialist do a site survey before anything is added or removed from the site. No cultural site survey has ever been done on this site. The Forest Service needs to review and approve any proposed improvements to the site. Authorization for use of this site will be a special use permit. Please provide details of any cultural surveys for Antenna Ridge for (cultural resources) impact analysis. [USFS comment Section 2.6.7 page 2-12].

5. Please provide more details about cable marker placement spacing along segments 3 and 4 (NPS land). Identify required distance between markers and increase distance between markers if able to. Provide a distance or estimated length (e.g. every time the cable crosses under a road) [NPS comment Section 2.6].

6. Project Schedule: states there would be no construction between December and February. How would project construction effect the Park’s prescribed fire season (typically between September and November)? [NPS comment Project Description Section 2. Page 2-30].

7. NPS expressed concerns about rock outcroppings and oak tree removal. The Project Description [Section 2.6.4, page 2-20]. states “that some rock and vegetation may be removed”. NPS notes: The area

from Schoolhouse LO road to Robbers Gulch road has native rock outcrops and oak trees adjacent to the in-board ditch. Would the contractor be free to determine when an oak needs removing?

APM SOIL-1 states “Disturbance of soils and vegetation removal will be limited to the minimum area necessary for access and construction” [Section 2.8 page 2-32] Can rocks be added to this statement for APM SOIL-1 to address concerns about rock outcroppings?

8. More detail is needed (Figure 2-9) for locations proposed as staging areas [NPS comment Section 2.6.3, pages 2-15, 2-16]. Per NPS comment: “Trailhead and day-use parking in RNP is not preferred. Archeological consideration may exclude others. Lyons Ranch Trailhead and Williams Ridge may not be appropriate for staging.” Please confirm or refine proposed staging/laydown area locations.

9. Project description: Segment 1 (page 2-7)- The BLM needs to know exactly what is being done on this section of land. How deep and wide is the trench. Is the area of disturbance within the road prism? Is it outside the existing road footprint/prism? This level of detail can mean the difference between issuing a ROW and not. Please provide details.

**Cultural Resources:**

10. Native American Communications [BIA comment Section 4.5.1 page 4-75]. Why were the Smith River and Elk Valley Rancherias not notified (or included in the WRA 2018 outreach) yet Round Valley was?

11. APM CR-6 should include reference to Wiyot Tribe supplying Native American Monitors in Wiyot Ancestral Territory. Please confirm proposed change to APM. [BIA comment Section 4.5.3 page 4-76]

12. Please provide details of any cultural resources survey/archaeological survey for (Forest Service lands) near proposed line at Orleans [USFS comment].