



Klamath River Rural Broadband Initiative CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the IS/MND/EA, create a new significant impact, are located within the geographic boundary of the study area of the IS/MND/EA, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: March 13, 2026

Report No.: 3

Date Approved: April 15, 2026

Approval Agency: CPUC

Property Owner(s): Multiple, including federal, state, county, and private land managers/owners and road managers.

Location/Milepost: Along State Highways 96 and 101, along Humboldt County roads in Orleans, Orick, Fieldbrook, and McKinleyville, including Bald Hills Road, and within existing PG&E ROW from Orick to Fieldbrook.

Land Use/Vegetative Cover: all within either existing disturbance footprint of roads or of PG&E transmission line rights of way.

Sensitive Resources: No increase in impact to biological or cultural resources, some impacts eliminated.

**Modification
From:**

Permit

Plan/Procedure

Specification

Drawing

Mitigation
Measure

Other: _____

Introduction

This project refinement reflects changes made to the mitigation measures through agency consultation and as a result of the removal of all work on the Yurok Reservation.

1. In the absence of a declaration of critical Pacific (Humboldt) marten habitat, the US Fish and Wildlife Service used a 2012 study of possible core areas and corridors, and designated two areas for limited operating periods (in Segment 1, at the edge of a designated possible corridor, and in Segment 5, where a proposed core habitat designation intersected the KRRBI alignment) in addition to the area so designated and accepted as part of the project (Segment 4) found in the Redwood National Park. (MM-BIO-2 (7)) originally read:

For Humboldt marten, a seasonal operating limitation shall be applied to identified marten core habitat which intersects the alignment in Segments 4 and 5. In these areas, no ground-disturbing construction activities would be permitted during the breeding season of Humboldt marten (March 1 to July 31).

Note that in addition to this measure, the USFWS also included a small area of Segment 1 in a seasonal operating limitation. When critical habitat was designated in a final decision by the USFWS, the proponent petitioned the USFWS to remove the two areas of limited operating period not included in the critical habitat listing, and this petition was approved in a revised USFWS response dated 2/7/2025. (MM-BIO-2 (7)) was amended to read:

For Humboldt marten, a seasonal operating limitation shall be applied to identified marten core habitat which intersects the alignment in Segment 4. In this area, no ground-disturbing construction activities would be permitted during the breeding season of Humboldt marten (March 1 to July 31).

2. Redwood National Park had initially requested that there be no above-ground markers designating underground fiber installation in the area of Lyons Ranches National Historic District. MM-CUL-9 originally read:

The Project through the District will avoid the use of buried fiber line placards or other above ground marker. The historical setting and feeling of the District shall be maintained and no above ground visual intrusions should be introduced as a way to mark the route of the underground fiber optic utility. Junction boxes or other infrastructure should also be at or below grade, and not made visible to park users.

After Humboldt County and the Yurok Tribe collaborated to pave (primarily with chipseal) the remaining unpaved Bald Hills Road through the Lyons Ranches National Historic District, the County installed intervisible above-ground markers to provide road-edge visibility at night. Since there were now above-ground markers present, the proponent conducted a field review of the markers and proposed locating markers of similar construction adjacent to existing markers that would state, on nonreflective paddles, that there was underground fiber and direct the reader to call USA-DIG. (Email submittal 11/26/2024). The proposed marker locations were approved by NPS administration on 12/10/2024.

The proponent therefore proposes the following revision to MM-CUL-9:

The Project through the District will limit the use of above ground markers to those locations and designs approved by NPS in 2024. The historical setting and feeling of the District shall be maintained and no above ground visual intrusions other than those approved should be introduced as a way to mark the route of the underground fiber optic utility. Junction boxes or other infrastructure should also be at or below grade, and not made visible to park users.

3. Since KRRBI is not building within the Yurok Reservation, the proponent proposes the following revision to MM CUL-3: Segment 2 South:

It is recommended that a tribal monitor be afforded an opportunity to observe all ground disturbing activities within Yurok territory. For the purposes of this Project, this area extends from PM 26.5 along Hwy 96 in Segment 1 downriver to the boundary of the Yurok Reservation at PM 25.05, along Bald Hills Road outside the Yurok Reservation, south on U.S. 101 and through industrial timberland, to the crossing of Little River. The Project route passes through and near several ethnographic villages, archaeological sites, as well as the Bald Hills Archaeological District, Lyons Ranches Historic District, and the Bald Hills Ethnographic District and the Yurok Tribe requests monitoring regardless of resource location, significance evaluations, or NHPA Section 106 findings. Tribal monitoring should be coordinated through the Yurok THPO.

Redwood National Park also requests that archaeological monitoring occur within all three Districts: Bald Hills Archaeological District, Lyons Ranches Historic District, and the Bald Hills Ethnographic District and that a discovery plan of action be in place, specifically to address trenching beneath paved surfaces, where field survey was unable to be completed, and to address secondary deposits that may be encountered within the inboard ditch.

Attachments:

- USFWS letter, 2/7/25, regarding marten habitat
- RNP approval of markers in Lyons Ranches National Historic District, 12/10/2024 (on file)

Resources:

Biological No Resources Present Resources Present N/A, Change would not affect resources

Previous Biological Survey Report Reference:

https://ia.cpuc.ca.gov/environment/info/esa/klamath/pdfs/Amended_PEA_App_BIO_report_redline.pdf

The removal of the limited operating period from the underground portions of Segments 1 and 5 is approved in the attached USFWS letter of technical assistance. The limited operating period will remain in place where indicated within the Redwood National Park in Segment 4. No resources will be adversely impacted by this change.

Cultural No Resources Present Resources Present N/A, changes would not affect resources

Previous Cultural Survey Report Reference:

This report is confidential and can be obtained by a qualified archaeologist with a reason to review from the CPUC. The information was used to prepare the cultural resources section of the amended Proponent's PEA: Direct APE was defined as 10' during construction, buffered to 30', surveyed by W. Rich & Associates and the Karuk Tribe (Rich & Watts-Tobin, 2021).

https://ia.cpuc.ca.gov/environment/info/esa/klamath/pdfs/KRRBI_PEA_2020_REV_11MAY2020-reduced.pdf

The proposed change to the mitigation measure MM CUL-9 documents the agreement between the Karuk Tribe and the Redwood National Park regarding limited and specific safety marker placement within Lyons Ranches National Historic District, Bald Hills National Archaeological District, and Bald Hills National Cultural District. The proposed change to the mitigation measure MM CUL 3 documents resources no longer at risk that are within the Yurok Reservation but maintains the requirement for Yurok Tribal Monitor opportunities within Yurok Ancestral Territory outside of the Yurok Reservation. All other measures remain in place.

Disturbance Acreage Changes: Yes No

Disturbance acres, estimated, for KRRBI

Segment	Miles		Est. Disturbance Acres			
	Original	Revised	Original		Revised	
			temp	perm	temp	perm
1	15.2	13.6	6.0	1.8	5.4	1.6
2	24.2	0.0	0.5	0.2	0.0	0.0
3	21.9	16.6	15.3	5.1	11.6	3.9
4	12.0	12.0	7.3	3.0	7.3	3.0
5	31.3	31.3	2.3	0.9	2.3	0.9
Project	104.6	73.5	31.4	11.0	26.6	9.4

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA/NEPA resource section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, Seismicity, Paleontological Resources	<input type="checkbox"/> Y	Reduced risk of impacts to geology, soils, and seismic resources due to reduced ground disturbance.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	Reduced quantity of hazardous materials or waste produced by proposed change due to reduced project distance.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	
	<input checked="" type="checkbox"/> N	
Hydrology/ Water Quality	<input type="checkbox"/> Y	Reduced risk of impacts to hydrology and water quality due to reduced ground disturbance.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input type="checkbox"/> Y	Reduced impact to cultural resources due to removal of work inside the Yurok Reservation.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input checked="" type="checkbox"/> Y	Consultation with Redwood National Park resulted in agreement the limited number and placement of safety markers for the underground utility would not result in an adverse impact to the three named historic districts, 12/10/2024.
	<input type="checkbox"/> N	
Tribal Cultural Resources	<input type="checkbox"/> Y	Reduced impact to tribal cultural resources due to removal of work inside the Yurok Reservation.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	Reduced impact to traffic and circulation due to removal of work inside the Yurok Reservation.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	Reduced impact on air quality due to reduction in size of overall project.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	
	<input checked="" type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA/NEPA resource section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Noise and Vibration	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	No change in impacts to noise and vibration due to change.
Aesthetics/ Visual Resources	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Reduced impact on aesthetics due to reduction in size of overall project.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Reduced risk of impacts to vegetation and wildlife due to reduced ground disturbance. The removal of the limited operating period from the underground portions of Segments 1 and 5 is approved in the attached USFWS letter of technical assistance. The limited operating period will remain in place where indicated within the Redwood National Park in Segment 4. No resources will be adversely impacted by this change.
Agency Consultation?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Consultation completed with USFWS 2/7/2025, resulting in removal of LOP from Segments 1 and 5.
Wildfire	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Reduced impact on the potential for wildfire, or for wildfire to harm project, due to reduction in size of overall project.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
Karuk Tribe Environmental Project Manager		Penny Eckert and Trevor Ward		<input type="checkbox"/> Reviewed
CPUC Project Manager	4/15/2026	Lisa Cooke		<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Approved with conditions (see below) <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

Conditions of Approval or Reason for Denial:

The Applicant has provided the reasoning, agency communication related to project permits, and necessary documentation describing the project change. The Mitigation Monitoring Compliance and Reporting Program (MMCRP) will be updated to reflect the change for consistency with current permit requirements.

Prepared by: M. Hensel/L. Cooke **Date:** 4/15/2026