

APPENDIX O

DRAFT EA PUBLIC COMMENTS AND RESPONSES

Received	Group	Commentor	Format	Category	Comment	Comment Response
5/9/2022	Caltrans	Emiliano Pro	Email	Cultural Resources	The EA states “Overall, with the implementation of standard avoidance measures and site-specific protection measures (Loftus et al. 2021), adverse impacts to tribal or cultural resources will be direct, short term, and negligible.” Wondering if this is a typo as adverse impacts would not be considered negligible?	Impacts to cultural and tribal resources do not meet the threshold for adverse impacts described in Section 3.4.4. The EA has been updated to read, “Overall, with the implementation of standard avoidance measures and site-specific protection measures (Loftus et al. 2021), impacts to tribal or cultural resources will be direct, short term, and negligible.”
5/9/2022	Caltrans	Emiliano Pro	Email	Cultural Resources	The IS states that the project would result in less than significant impacts to cultural and tribal cultural resources. IS states “These measures are prescribed project wide, or at specific sites along the Project, as described in Loftus et al. 2021 to avoid and limit impacts to cultural resources. Impacts to cultural resources—including their potential demolition, destruction, relocation, or alteration—would be less than significant and would be further minimized by the implementation of these measures.” What are the anticipated impacts. The documents state that eligible, assumed eligible, and listed resources would be avoided. Are the unanticipated impacts the less than significant impacts?	Added language to clarify that the “less than significant” impacts to cultural and tribal resources discussed in the ISMND would be unanticipated impacts associated with inadvertent discovery, which could include the potential demolition, destruction, relocation, or alteration of buried resources.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	75 pages, excluding appendices	Added.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	Please add FHWA	Added.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	FHWA/Caltrans ROW Use Agreement, 23 CFR Part 710, Subpart D.	Added detail to Table 1 regarding the FHWA/Caltrans ROW Use Agreement, 23 CFR Part 710, Subpart D.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	Please add FHWA and Caltrans if any of the footprint is in the ROW. If there isn’t any work in our jurisdiction, please consider making a statement to that effect. That way the reader will not have any reason to question the completeness of the table.	Disturbance calculations for Caltrans fee-owned ROW have been added to Tables 2 and 8. The extent of the Caltrans fee-owned ROW was not known at the time the Draft EA was circulated for public review.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	It might help to explain that FHWA ROW is managed by Caltrans and then drop FHWA out.	Added a footnote to this effect.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	If Caltrans is included, it would help if that was noted in the text or the table.	The table has been adjusted.
5/10/2022	FHWA	Shawn Oliver	Email	Multiple	NEPA terminology needs to be addressed. A separate CEQA and NEPA table or set of bullet points might be the easiest solution. A table with CEQA and NEPA equivalencies could be developed and then the NEPA terms dropped.	Additional language has been added to clarify which effect types do not likely rise to the level of significance under NEPA. The entries for direct and indirect effects already utilize NEPA terminology, while the entries for "high" and "long-term or permanent" effects are qualified by the statement, "which may be considered significant under the NEPA".
5/10/2022	FHWA	Shawn Oliver	Email	Recreation	Please include 4(f) impacts, or lack of impacts in the table. Cultural Resources and recreation ROW will be the two main areas to address. If there aren’t any 4(f) impacts to FHWA ROW, then state that, and you shouldn’t have to address them any further.	Per subsequent FHWA guidance, 4(f) does not apply to Digital 299 because the project does not have Title 23 funding and is not transportation-related.
5/10/2022	FHWA	Shawn Oliver	Email	Issues Outside NEPA	It would be helpful to the reader if there was a reference to Caltrans and FHWA in agencies listed earlier. “...as agreed to by all participating agencies.”	Amended language to read, "as agreed to by the participating agencies".
5/10/2022	FHWA	Shawn Oliver	Email	Water Resources	I think the document would benefit from more description here. The size and depth of the wetlands is very important. Perhaps the indicated wetlands are generally small areas, such as culverts?	Added clarifying language to Sections 3.3.2.2 and 3.6.4.1. In order to avoid duplicative content, wetlands and other aquatic resources are discussed in greater detail in Section 3.3, Biological Resources.
5/10/2022	FHWA	Shawn Oliver	Email	Recreation	4(f) should be addressed in this section. 4(f) is specific to the DOT, and can be referenced as such.	Per subsequent FHWA guidance, 4(f) does not apply to Digital 299 because the project does not have Title 23 funding and is not transportation-related.
5/10/2022	FHWA	Shawn Oliver	Email	Recreation	4(f) impacts?	Per subsequent FHWA guidance, 4(f) does not apply to Digital 299 because the project does not have Title 23 funding and is not transportation-related.
5/10/2022	FHWA	Shawn Oliver	Email	Socioeconomics	All of the data should be based on the 2020 census.	Updated based on the 2020 U.S. Census.
5/10/2022	FHWA	Shawn Oliver	Email	Socioeconomics	This could be way off. https://www.census.gov/quickfacts/fact/table/CA,US/RHI825220 White alone, not Hispanic or Latino = 36.5%.	Updated based on the 2020 U.S. Census.
5/10/2022	FHWA	Shawn Oliver	Email	Socioeconomics	Please correct.	Updated based on the 2020 U.S. Census.
5/10/2022	FHWA	Shawn Oliver	Email	Socioeconomics	Please correct, based on the most recent census data.	Updated based on the 2020 U.S. Census.
5/10/2022	FHWA	Shawn Oliver	Email	Socioeconomics	If there is any chance of there being disproportionate impacts to disadvantaged communities, please fully explore the issue. The current Administration has made Environmental Justice a top priority.	Noted.

5/10/2022 FHWA	Shawn Oliver	Email	Issues Outside NEPA	The CEQ regulation have recently been updated. Please make sure that your information reflects that.	Added references to the May 2022 NEPA implementing regulations where appropriate in Section 3.11, the Executive Summary, and Appendix V.
5/10/2022 FHWA	Shawn Oliver	Email	Cumulative Effects	This section is confusing, since wildfires are not projects. That doesn't seem to fit this category. Please address under Cumulative Impacts. Or, add language that clarifies why wildfires are being considered here. For example, the restoration of the areas impacted by wildfires could be considered projects, but I don't think that would fall under an impacts analysis.	Updated to clarify that Section 3.11.2.3 refers to cumulative effects from temporary road closures, additional traffic, and impeded access to recreation along SR 299 for the duration of wildfire restoration activities.
5/10/2022 FHWA	Shawn Oliver	Email	Issues Outside NEPA	Please add FHWA as a reviewer.	Added.
1/10/2022 Agency	Tim Keefe	Email	Cultural Resources	The explanation how this was a secondary line was very useful. I believe I noted the details of how this should be described construction wise as being totally located in the roadway fill as it crossed the island. In future, if the line was to be permitted here, the details could be revised with what was needed to truly confirm avoidance.	The EA has been updated to note that per the request of the Wiyot Area Tribes, any conduit built on Tuluwat Island would be installed within the raised road ROW.
2/1/2022 Agency	Emilano Pro, Caltrans	Email	Biological Resources	<p>CEQA Environmental Checklist Form; question a) of section IV. BIOLOGICAL RESOURCES</p> <p>The document states: "If Vero Fiber Networks (Vero) trenches through dry waterways or places bore pits in vegetated areas, impacts to special-status species, waterways and sensitive habitats could occur. Mitigation measures described in the Restoration Plan will contribute to reducing impacts to a less than significant level".</p> <p>Based on the subsequent special status species discussions it appears as though these statements are in reference to potential project-related impacts to special status plants and fungi. The document goes on to include a discussion of theoretical impacts to these species but fails to discuss rationale (e.g. qualitative or quantitative) regarding the significance of such impacts prior to the implementation of mitigation measures. Accordingly, it is difficult to understand how the proposed mitigation would reduce impacts to less than significant.</p>	Section IV(a) of the CEQA checklist has been adjusted per Caltrans' recommendations.
2/1/2022 Agency	Emilano Pro, Caltrans	Email	Biological Resources	<p>CEQA Environmental Checklist Form; question b) of Section IV. BIOLOGICAL RESOURCES</p> <p>Although this section states that the project would have an impact of Less Than Significant with Mitigation Incorporated, it fails to discuss what significant project-related impacts to riparian habitat or other sensitive natural community would occur, what mitigation measures are proposed to address such impacts, and how they would reduce the impacts to less than significant.</p> <p>For questions a) and b) the document should clearly define (quantitatively and qualitatively) the anticipated project-related significant impacts prior to the implementation of mitigation, mitigation measures to address significant impacts, and how such measures would reduce the impacts to less than significant.</p>	Section IV(b) of the CEQA checklist has been adjusted per Caltrans' recommendations.
2/1/2022 Agency	Emilano Pro, Caltrans	Email	Cultural Resources	<p>CEQA Environmental Checklist Form Section V. CULTURAL RESOURCES</p> <p>Caltrans understands that compliance with Section 106 of the National Historic Preservation Act is pending. Upon completion Caltrans will use the final Section 106 documentation to ensure compliance with Public Resources Code 5024 and Governor's Executive Order W-26-92, addended 2019. It should be noted that if the results of the Section 106 compliance effort contradict the findings in the ISMND, Caltrans may not be able to use the EA/ISMND when acting as a Responsible Agency.</p>	Comment noted.

2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>The restoration plan (Appendix J of the EA/MND) has not been finalized according to avoidance, minimization, and mitigation measure BIO-3 (AMM BIO-3). The restoration plan reiterates AMM-BIO-3 at the beginning of the document in which it is clearly stated that seeding will be done with locally sourced native species. However, the project schedule on page 3 of the plan states in the late summer of 2022, “species lists for seed mixes are drafted and sent to agencies for approval, and seeds are ordered from nurseries or California native seed companies.”. The Department prefers seed to be locally sourced from where the restoration will take place and not purchased from nurseries or native seed companies unless it can be shown that the seeds were collected in the same vicinity as the project impact. The Department recommends inquiring with the various United States Forest Service districts to see if they have any locally collected seed and/or container stock that could be used for this project.</p> <p>On page 5 of the restoration plan, a description of seeding methods is provided. The Department recommends adding in a sentence stating if invasive species are present at the site, they will be removed prior to manual seeding or hydroseeding. As currently described, it appears that seeding and/or hydroseeding will occur without hand pulling or reducing the amount of invasives first.</p>	The contractor will contact Six Rivers and Shasta-Trinity National Forests regarding locally collected seed stock. The Restoration Plan has been updated to note that if invasive species are present at the site, they will be removed prior to seeding.
2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>AMM BIO-8 Special-Status Plants</p> <p>Avoidance, Minimization, and Mitigation measure AMM BIO-8 states that if a special-status species is found during pre-construction surveys, and cannot be avoided by a minor re-route, the Project biologist will contact the appropriate agency to discuss potentially salvaging the affected plants. The Department generally considers salvage and relocation (translocation) to be an ineffective way to compensate for permanent impacts to rare, threatened, endangered, and sensitive native plants (rare plants)1. Rare plant translocations for mitigation have a low success rate (less than ten percent)2 and the Department considers such efforts experimental, unless they have been demonstrated to be effective through long-term experimentation. Successful rare plant translocations require many years of habitat surveys, habitat modeling, site selection, seed collection, plant propagation, site preparation, monitoring, and remedial actions such as management of competing plants, supplemental watering, and supplemental planting. Success is not guaranteed, and even translocations that are initially successful may fail to persist over the long term.</p> <p>Furthermore, transplantation efforts do not replace intact ecosystems or maintain the entire range of genetic diversity at the impact site. The presence of rare plants often signifies the presence of biogeographically important sites with unusual soil, microclimate, or other conditions that are not easy to identify and difficult or impossible to duplicate. Loss of genetic material from rare plant translocation may also hinder introduced populations from withstanding changing environmental conditions over time. Conservation translocation of plants requires consideration of a number of factors that might not be considered for animal species, such as microclimate, soil, pollinators, herbivory, weed management, mycorrhizal associations, and adequate monitoring that could reasonably span many years. These factors considerably increase the complexity and risk of failure of plant translocations. The most effective way to mitigate for permanent loss of rare plant habitat is therefore to protect and manage existing populations in their natural habitat. If protection of the population is not possible, mitigation may be required to reduce significant impacts to less than significant.</p>	Comment noted. CDFW and land managing agencies will be notified of sensitive plant and lichen species that cannot be avoided by a minor re-route, and transplanting options will be explored for bulbiferous, hydrophytic, or non-vascular species.
2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>AMM BIO-9 Invasive Species Prevention</p> <p>AMM BIO-9 states, “Contractor vehicles, equipment, tools, boots, and clothing will be cleaned inside and out prior to mobilization of Project segments on federal lands or California Department of Transportation ROW to limit the introduction on non-native species and pathogens (e.g., Port Orford cedar root fungus) on the Project corridor, including in areas potentially affected by recent wildfire.” The cleaning of vehicles, equipment, tools, boots, and clothing should occur project wide and not only on federal lands or Caltrans rights-of-way. Linear projects that include ground disturbance may facilitate infestations of invasive species over a great distance. It is vitally important that impacts from this Project do not increase the amount of invasive species or introduce new species. The Department suggests the beginning of AMM-BIO-9 read as such:</p> <p>Contractor vehicles, equipment, tools, boots, and clothing will be cleaned inside and out to limit the introduction on non-native species and pathogens (e.g., Port Orford cedar root fungus) on the Project corridor, including in areas potentially affected by recent wildfire.</p>	The AMM has been adjusted per CDFW's recommendation.

2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>AMM BIO-13 Nesting Birds</p> <p>The Department typically recommends February 1 – August 31 for the nesting bird season to capture early nesters such as great horned owl or bald eagle and late nesters or second broods. The Department suggests replacing February 15 with February 1 or adding “other early nesting raptors” to the first sentence so it reads as follows (changes in bold):</p> <p>If work will occur during the nesting bird season (February 15 until August 31 OR January 1 until August 31 where there is potential for nesting eagles and other early nesting raptors), nesting bird surveys will be conducted within 7 days prior to the onset of construction by a Project biologist or biological monitor familiar with the species that may nest in the Action Area with standard nest-locating techniques.</p>	The AMM has been adjusted per CDFW's recommendation.
2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>AMM BIO-14 Aquatic Resources/Fisheries</p> <p>Federally listed, state listed, and dually listed species occur on this Project. The first sentence measure AMM BIO-14 should read (changes in bold):</p> <p>To avoid and minimize adverse effects to federally and state-listed and special-status fish and wildlife, the following measures shall be implemented:</p>	The AMM has been adjusted per CDFW's recommendation.
2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>AMM BIO-15 Special-Status Amphibians</p> <p>The measure should read (changes in bold):</p> <p>When ground-disturbing work is occurring within 100 feet of waterways that have water present and that are suitable habitat for special-status amphibians, a qualified biologist will conduct a predisturbance survey for special-status amphibians (adults, subadults, tadpoles, or egg masses). The survey area will include suitable habitat within 100 feet of perennial and intermittent waterways, within 25 feet of ephemeral drainages, and at least 100 feet upstream and downstream of the work area. The biologist will conduct surveys for special-status amphibians prior to the start of ground-disturbing activities. If no special-status amphibians are detected, work may resume for 3 to 5 days before new surveys need to be conducted.</p>	The AMM has been adjusted per CDFW's recommendation.
2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>AMM BIO-17 Special-Status Mammals</p> <p>AMM-BIO-17 states pre-disturbance denning mammal surveys at den sites within the construction corridor will be conducted in suitable denning habitat. Please provide more description on exactly how these surveys will be conducted and what methods will be used to identify denning areas.</p>	The AMM has been adjusted per CDFW's recommendation.
2/2/2022 Agency	Tina Bartlett, CDFW	Letter	Biological Resources	<p>Survey Results</p> <p>If any special-status species are found during surveys, the Department requests that CNDDDB forms be filled out and sent to Sacramento and a copy of the form be sent to the Regional office at the above address. Instructions for providing data to the CNDDDB can be found at: https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data. The results of all pre-construction surveys shall be sent electronically to the Department at R1CEQARedding@wildlife.ca.gov.</p>	Comment noted. Per AMM BIO-1, CNDDDB forms will be completed and sent to Sacramento, and copies of the forms will be sent to the Regional office, if any special-status species are found during surveys.
1/10/2022 Agency	Gavin McCreary, Department of Toxic Substances Control	Letter	Health and Safety	<p>The MND should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The MND should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.</p>	The MND acknowledges that per measure HZ-1, the Hazardous Substance Control and Emergency Response Plan will provide protocols for managing hazardous substances during construction and for responding to potential emergencies encountered in the field related to hazardous material.
1/10/2022 Agency	Gavin McCreary, Department of Toxic Substances Control	Letter	Health and Safety	<p>Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the MND.</p>	The MND acknowledges that per measure HZ-1, the Hazardous Substance Control and Emergency Response Plan will provide protocols for managing hazardous substances during construction and for responding to potential emergencies encountered in the field related to hazardous material.

1/10/2022 Agency	Gavin McCreary, Department of Toxic Substances Control	Letter	Health and Safety	If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the MND. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook.	The MND acknowledges that per measure HZ-1, the Hazardous Substance Control and Emergency Response Plan will provide protocols for managing hazardous substances during construction and for responding to potential emergencies encountered in the field related to hazardous material.
1/10/2022 Agency	Gavin McCreary, Department of Toxic Substances Control	Letter	Health and Safety	If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers.	The project scope does not include demolishing buildings.
1/10/2022 Agency	Gavin McCreary, Department of Toxic Substances Control	Letter	Health and Safety	If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 Information Advisory Clean Imported Fill Material.	The MND acknowledges that per measure HZ-1, the Hazardous Substance Control and Emergency Response Plan will provide protocols for managing hazardous substances during construction and for responding to potential emergencies encountered in the field related to hazardous material.
1/10/2022 Agency	Gavin McCreary, Department of Toxic Substances Control	Letter	Health and Safety	If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the MND. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 Interim Guidance for Sampling Agricultural Properties (Third Revision).	The MND acknowledges that per measure HZ-1, the Hazardous Substance Control and Emergency Response Plan will provide protocols for managing hazardous substances during construction and for responding to potential emergencies encountered in the field related to hazardous material.
1/6/2022 Public	Personal Information Withheld	Mail	Issues Outside NEPA	Will this also provide cell coverage?	The fiber network will have available capacity for open access use including in the wireless space. Cell tower construction would be a separate and future action performed by others. Fiber could then be extended from Vero's fiber footprint to the tower and leveraged to support wireless data transmission.
1/8/2022 Public	Personal Information Withheld	Mail	Socioeconomics	1) What is the current estimate of when home connections in Lewiston? 2) What will be the provided speed and fee to end user? 3) I live on the spur off segment 21 on Viola Lane.	The fiber network will have available capacity for open access use including making the platform available to local internet service providers (ISPs). The initial phase of construction is expected to start in the third quarter of 2022, with a duration of 24 months. Construction of spurs and lateral extensions would be performed as a separate and future action, either by Vero or an ISP. The ISP would determine speeds and fees.
1/10/2022 Public	Billy Oakes	Mail	Socioeconomics	What provisions, if any, are there for "end use" customers; i.e. residents along the 299 corridor, specifically in the Salyer area? If none, how does this enhance rural access to the fiber/broadband going through our area?	The fiber network will have available capacity for open access use including making the platform available for wireless companies and internet service providers. These companies wil be able to leverage the footprint Vero builds to extend their reach into communities along the alignment. Construction of spurs and lateral extensions would be performed as a separate and future action, further extending this access.
1/18/2022 Public	Roger Brown	Mail	Issues Outside NEPA	What would be back up if damage occurred this area is known for slides with equipment digging into roadways & sides.	Vero is building single path along the D299 routing, so if it is damaged there would be no alternate routing in the event of an outage. Vero will patrol this crucial network regularly and will have maintenance crews on standby in the event of an outage to restore service as quickly as possible.
1/28/2022 Public	Karl Boettcher	Voicemail	Issues Outside NEPA	I have property on 299. I have a spring box on the uphill side of the highway a mile marker 2424. And it's six feet down right next to the edge of the highway. I don't really know how you're going to get something passed there. I can't quite tell on your map, if you guys are taking an alternate route, and I would like to be informed. Karl Boettcher, PO Box 322, Blue Lake. Well, be nice if you called me back and let me know, I'd lose sleep over somebody trying to dig up my spring box. (707) 599-3315. OK, thanks, bye.	Vero spoke on the phone with the member of the public on 2/15/22. The property in question is along an alternative route. In the event that this alternative route is constructed, Vero will coordinate with the owner to ensure that the spring is avoided by construction.
1/5/2022 Public	Personal Information Withheld	Text message	Issues Outside NEPA	What is the fiber optic for? What is it carrying?	Transcon followed up with the individual on 1/5/22 to confirm that the fiber optic cable will provide broadband internet to communities along the route.

1/6/2022 Public	Personal Information Withheld	Mail	Public Involvement Process	There is no map included in this mailing! You repeat 1 paragraph - that it was "on hold" Please send me a MAP of where this wil be constructed and how it will impact us. You can do this by mail.	Transcon mailed a map to the individual detailing the portion of the alignment in the vicinity of their residence.
1/20/2022 Public	Personal Information Withheld	Mail	Biological Resources	Think service is important, but that leads to social concerns. What will the costs be to residents along the 299 corridor? How is the line/service laid? Will there be debris into the river? Will there be any potential injury/impacts to birds, fish, and wildlife?	The EA/ISMND details construction methods and analyzes potential impacts to the human and natural environment.
1/5/2022 Public	Personal Information Withheld	Voicemail	Issues Outside NEPA	Expressed concerns with the potential location of last-mile aerial attachments along Deadwood Road in Lewiston. Requested to speak with Vero Fiber Networks. Requested a physical copy of the NEPA/CEQA document.	Transcon mailed the member of the public a physical copy of the NEPA/CEQA document per her request. Vero spoke on the phone with her on 1/31/22.
1/25/2022 Public	Dena Magdeleno, Elder for Tsnungwe Council	Mail	Cultural Resources	We oppose the plan. There has been no effort to consult with our tribe.	The Tsnungwe Council was invited to confer with the Six Rivers (SRNF) and Shasta-Trinity National Forests (STNF) under NHPA Section 106 on 9/26/19 and 8/28/19, respectively, and was invited to confer with the California Public Utilities Commission (CPUC) under California AB-52 on 5/8/19. Additionally, representatives of the Tsnungwe Council attended a field visit with Transcon and agency representatives on 10/29/19 to discuss cultural monitoring for the Hlel-din site. The Council was sent an AB-52 update letter and map outlining subsequent project changes on 10/29/21. On 12/17/21, the Council was invited to review and provide input on an electronic copy of the Cultural Resources Inventory Report (CRIR) sent with a cover letter from CPUC and Section 106 update letters from SRNF and STNF.
1/25/2022 Public	Aldena A. Magdeleno, SF Trust	Mail	Issues Outside NEPA	The change from the Inyo project plans leave South Fork Rd without access. I oppose the change on behalf of our Trust.	The adoption of the new primary middle-mile alignment along SR 299 between Burnt Ranch and Salyer will not change the potential for last-mile connections to homes along South Fork Road.
1/31/2022 Public	Personal Information Withheld	Mail	Issues Outside NEPA	Objections to aerial attachments along Deadwood Road from McColm Drive through community access road and across river from/at said points and to any use of other utility power poles (PUD/PGE) joint pole agreements and all per telephone chat with Josh Nelson 1/31/22. Under ground easement at river side of McColm subdivision to be negotiated upon request.	Comment noted.
1/25/2022 Public	Personal Information Withheld	Mail	Issues Outside NEPA	I do not support this project. We do not want or need this in our area. We love the way we live here. We, as a community, reject your proposal. We do not want growth, change, higher speeds, wider roads, etc. We want it to stay the way it is. Leave us alone. Please stay out of here! We say NO!	Comment noted.
1/6/2022 Public	Jessica Beck	Voicemail	Issues Outside NEPA	Hi, my name is Jessica, an office manager over at Arcata United Methodist Church. And you guys have us as the First Methodist Church of Arcata, and I received your letter, it was postmarked January fourth of this year, and it states in the letter for the CEQA/NEPA comments that are due two days before you mailed a letter or before the letter was processed by the post office. So just wondering how you guys are going to be dealing with that. I'm also sending an e-mail. Thank you. [...] Hi, this is Jessica again, please disregard my last message. I didn't realize that it is not February. OK, thank you.	Comment noted.
1/13/2022 Public	Personal Information Withheld	Mail	Issues Outside NEPA	No comment	Comment noted.
1/12/2022 Public	Mike Colucci	Mail	Issues Outside NEPA	I would like to see this in my areas sooner the better	Project support has been noted.
1/10/2022 Public	Patricia Anne Fleschner	Mail	Socioeconomics	The project does not seem to directly affect Trinidad, about 12 miles north of the 299-101 intersection. However, when and if your broadband work extends to our rural, underserved, and abysmally inadequate internet capability area, we would be pleased to hear of such developments. The old Redwood Highway 1 (Scenic Drive) is particularly underserved.	Project support has been noted.
1/7/2022 Public	Linda K. Glaros	Mail	Issues Outside NEPA	I am happy to get the broadband project up to us.	Project support has been noted.
1/6/2022 Public	Personal Information Withheld	Mail	Issues Outside NEPA	It's a great idea, it's about time, great investment for the future	Project support has been noted.
1/10/2022 Public	Lauderdale Motors	Mail	Issues Outside NEPA	BRING IT!	Project support has been noted.
1/6/2022 Public	Steve Morris	Mail	Issues Outside NEPA	Cut through the red tape and build the project. Minimal environmental impact, Huge step forward for communication in rural areas.	Project support has been noted.

1/13/2022	Public	Pamela Nowell	Mail	Issues Outside NEPA	I just want to say I am looking forward to the broadband project to be finished. It will be so nice to use it. Thanks so much.	Project support has been noted.
1/8/2022	Public	Bob Shufelberger	Mail	Issues Outside NEPA	Property address (no mail) 6100 Hwy 273 Anderson, CA 96007	Updated address has been noted.
1/13/2022	Public	Gary & Nancy Standley	Mail	Socioeconomics	We are senior citizens who frequently experience power and phone (landline) outages. There are no cell towers near us and our cell phones are not accessible except with satellite wifi. Fires over the years have isolated us along with the recent unprecedented snowstorm. Power has been out as long as 2+ weeks at a time. Landlines have been out for over 2 months at a time. 299 has been experiencing full closures frequently. Thus we frequently are physically as well as electronically isolated. Acquiring emergency access and/or information is very limited.	Comment noted.
1/19/2022	Public	Personal Information Withheld	Mail	Issues Outside NEPA	Would love to see this happen in our area.	Project support has been noted.
1/8/2022	Public	Willie Stein	Email	Socioeconomics	Dear Mr. Barnsdale and Mr. Alexander, I write to submit public comment on the Digital 299 Broadband Project. I live on Himalaya Drive in Trinidad, California. It is my understanding that the main “mid-mile” line of the proposed project will serve the community of Trinidad along Highway 101. I am writing to submit a request that my neighborhood be served in the “last-mile” second phase of the project. My house, and the other houses on Himalaya Drive, are not served by any wire-connected broadband internet service. Altice (dba Suddenlink) operates in town but there is no infrastructure for it to offer service to me or any of my neighbors. My neighbors down the hill on Berry Road are served but the cable ends there. Satellite internet is available at high cost, but many properties in the neighborhood do not have a clear view of the sky because the area is heavily forested with coast redwoods. Wireless providers do not offer cellular tower-based LTE internet service here. At my house and the houses around me, Starlink satellite internet is not feasible because of trees obstructing the connection. Many of us rely on cellular data hotspot devices which are not intended to be used as full-time home internet because they are the only option. I received a quote from Suddenlink to lay last-mile cable to my house which was over \$12,000, which is not feasible for me. It is my understanding that many people in the community of Westhaven, which runs along Westhaven Drive on various spur roads, are in a similar situation where there is no cable to connect them to reliable broadband. The area surrounding Trinidad is shockingly underserved with last-mile infrastructure. To the extent the Digital 299 project includes funding for last-mile cable installations, the exurban area near Trinidad should receive that funding. The Trinidad/Westhaven area is rural enough to be seriously underserved, yet dense enough that dollars invested here would have a major impact on a relatively large number of people. If the project is looking for places where investment will make the most impact, our area is a good candidate. Thank you,	Project support has been noted.

2/12/2022	Public	Willie Stein	Email	Issues Outside NEPA	<p>Mr. Barnsdale,</p> <p>I live in Trinidad, CA, the proposed northern terminus of the Digital 299 Broadband project. Some documentation suggests that Phase Two of the project will be last-mile as opposed to mid-mile delivery of cable.</p> <p>My questions are: who will be doing that, and who will the ISP be that then handles those consumer connections?</p> <p>I am asking because my house, and the houses of several neighbors, are not connected to cables capable of carrying anything faster than dial-up. I am negotiating with a local ISP, Suddenlink, to price a connection to our homes, but it is exorbitantly expensive.</p> <p>I'd like to make sure whoever will be installing last-mile cable and whoever will be servicing it are all aware we are seriously underserved in my neighborhood and would like to be connected in Phase Two.</p> <p>Looking forward to hearing from you.</p> <p>Best,</p> <p>Willie Stein</p>	Comment noted.
1/9/2022	Public	David McCoy	Mail	Socioeconomics	<p>I am deeply concerned by frontier blocking public access to this broadband project. I initially protested their block with the FCC when this project was funded. I filed A written protest but it was ignored. Frontier is not a stable company not only Has our area been out of service since July there is no cell service here we desperately need some kind of communication here broadband could provide that with Wi-Fi calling. I respectfully ask that this broadband be access to the general public so they can benefit by it. It is deeply needed here in Rural Trinity county. 90% of our residents have no communication righ now broadband would provide that. Frontier is not the company that can facilitate this.</p>	Comment noted.
1/10/2022	Public	Patricia Oakes	Mail	Socioeconomics	<p>Primary concern is guarantee that our local community SALYER and also BURNT RANCH residents will be OFFERED digital service. Right now we are in an information wasteland. No phones, routine power outage, expensive. We pay over \$200 a month for basic land line phone that seldom works and broadband is 150 G/month.</p>	Comment noted.
1/7/2022	Public	Personal Information Withheld	Mail	Socioeconomics	<p>Thank you for the opportunity to comment. To speed up broadband access to rural areas along Hwy 299 leg Burnt Ranch, Willow Creek, please consider putting cell towers in strategic areas along Hwy 299 (top hills/mountains) so that cellular modems could be used by rural residents. This will greatly improve & enhance livelihood and economic vitality of residents and communities. Thanks!</p>	Comment noted.
1/12/2022	Public	Sandra Sterrenberg	Mail	Socioeconomics	<p>We have concerns that this project will by-pass our communities along the Trinity River and Highway 299, offering no way to access service. We are very isolated here with no landlines because Frontier is an incompetent company and no cell access. For our safety & civic participation, we need digital broadband.</p>	Comment noted.
1/7/2022	Public	John P. Wilson	Mail	Issues Outside NEPA	<p>I want to be an inspector!</p>	Comment noted.
1/18/2022	Public	Personal Information Withheld	Mail	Issues Outside NEPA	<p>Please continue this project. Your commitment to completing this project is very much desired.</p>	Project support has been noted.
1/27/2022	Public	Cheryl Arnold	Mail	Issues Outside NEPA	<p>Would love to see the estimated time line for each step (area) of installation in Phase II. Also, estimated monthly cost per household.</p>	Comment noted.
2/21/2022	Public	Not provided	Mail	Issues Outside NEPA	<p>I think it's terrible that the path for the line follows Hwy 299, then breaks away at Big Bar, continues to Underwood Mtn Rd, before rejoining Hwy 299. It skips many of us who have been supporting this project for years. We will not be supporting it any more. Hope you go out of business when Musk gets his Star Link project up and running.</p>	Comment noted.
1/19/2022	Public	Personal Information Withheld	Mail	Soils	<p>I am concerned about the fragile soils of the Titlow Hill area. My hope is that it follow Hwy 299, not the proposed alternate route that does not follow Hwy 299. I would like to request last-mile connections for rural communities along the way, specifically Chezem Road neighborhood in Humboldt County. Thank you.</p>	Comment noted.

2/2/2022 Public	Travis Finch, Velocity Communications	Letter	Land Use	<p>1. The EA Incorrectly Concludes that All Aerial Segments Will Use Existing Utility Poles</p> <p>The EA concludes that Digital 299 will have no impact or less than significant impact on scenic vistas and resources. This conclusion rests on a conclusory statement with no apparent factual analysis that fiber and equipment will be hung on existing utility poles and bridges. This conclusion is deficient for several reasons.</p> <p>First, the level of detail on the project map and in the project description for aerial construction is not sufficient and does not identify specific existing poles. Section 2.2.2.2 states “It is possible that existing poles would have to be replaced if existing poles are overburdened. Locations of such replacements are not known at this time...” The EA makes no effort to determine the effect if numerous poles must be replaced. Based on local observation, many poles in the project area are either overloaded or in bad repair. No analysis of existing pole condition has been presented. If poles are not usable, they will need to be replaced, resulting in ground disturbance for which there has been no archeological, biological or botanical analysis or Native American consultation. In addition, Vero might choose not to replace a degraded or overloaded pole but instead to place a new pole nearby and leave in place the existing pole (though topped off to a shorter height) creating a proliferation of “Buddy” poles that affect the aesthetics in a highly scenic area dependent on tourism and recreational uses.</p>	<p>Vero intends to hang aerial fiber on existing utility poles and bridges unless doing so is not possible due to unknown future conditions. The number of existing poles that would need to be replaced cannot be known prior to prior to permit issuance because last-mile aerial attachments would be built in 2024 or later once the construction of the middle-mile route is complete, during which time the location and condition of existing poles could change. The number of poles, if any, that would need to be replaced, and the effects of replacing those poles, would be determined prior to the construction of the last-mile segments.</p>
2/2/2022 Public	Travis Finch, Velocity Communications	Letter	Land Use	<p>2. The EA Does Not Analyze Alternative Proposed Aerial Construction on Scenic Highway</p> <p>The EA anticipates that virtually all of the construction along Highway 299, a scenic highway, will be done with underground boring, trenching, or plowing, with a sufficient level of analysis. Section 2.3.1, however, presents an <i>Aerial Construction</i> alternative, but does not provide much analysis other than to state that “...there is no continuous existing pole line along the SR 299 corridor”. Many areas in the project, such a Burnt Ranch, will not accommodate boring or trenching along the roadway due to geology or ROW width and will likely require the use of aerial construction, however this is not addressed. The installation of poles and aerial fiber optic lines in rocky areas with narrow ROW, particularly along the Wild and Scenic Trinity River, will greatly degrade aesthetics. The presence or absence of existing poles in areas designated for aerial construction is also not addressed.</p> <p>Based on local observation, several areas designated for aerial construction do not have existing poles and will require them to be installed, causing ground disturbance and degradation of aesthetics. The entire project could likely shift from a very small amount of aerial construction to a significant amount based on geology. One of the reasons given for Inyo Networks abandoning the project was due to the fact that CalTrans did not want underground cable installed along certain portions of Highway 299. Vero should be required to provide a detailed analysis of the likelihood of obtaining Caltrans permits for underground installation of its facilities and analysis of the environmental effect of shifting to a substantial amount of aerial installation and submit a revised <i>Aerial Construction</i> alternative.</p>	<p>As discussed in Section 2.2.2.1 of the EA, Vero would use plowing or trenching in areas where HDD is not feasible due to terrain or environmental constraints. Areas of fracture rock or areas that are otherwise unsuitable for plowing or HDD would be constructed using trenching machines, excavators, backhoes, or rock saws. As discussed in Section 2.3.1, aerial construction was not chosen as an installation method for middle-mile fiber due to the following reasons: 1) there is no continuous existing pole line along the SR 299 corridor; 2) power lines are remote from most of the communities to be served; 3) aerial facilities are vulnerable to wildfire damage, which undermines its utility as a dependable public safety network; and 4) aerial communication facilities are exposed to vandalism and terrorist attacks. There is no plan to shift the middle-mile construction method to aerial attachment.</p>
2/2/2022 Public	Travis Finch, Velocity Communications	Letter	Land Use	<p>3. EA Fails to Analyze Traffic Disruption for Areas Highly Dependent on Tourism Access</p> <p>The EA incorrectly concludes that traffic disruption from this project is “less than significant”. Anywhere from 1,600 to 9,600 cars travel along Highway 299 every day depending on the location. Trinity County has economically suffered for years from disrupted traffic on Highway 299 due to rockslides, fires, and most recently storm damage. The Monument Fire in 2021 caused widespread economic hardship resulting in the closure of multiple local businesses. Disrupting traffic along this route for the duration of this project will cause loss of revenue to tourism, hospitality, and recreation-based businesses which are already struggling.</p>	<p>As described in Chapter 3 of the EA, traffic and transportation impacts would be avoided or minimized by implementing agency-approved Traffic Control Plans developed for the Proposed Action.</p>

2/2/2022	Public	Travis Finch, Velocity Communications	Letter	Purpose and Need	<p>4. EA Fails to Consider Effect of Digital 299 on Utility Service from State Fiber Middle Mile Network</p> <p>Senate Bill 156 was signed into law in July of 2021 and provides \$3.25 billion to create a state-owned, open-access middle-mile network throughout California. Highway 299 has been identified as a potential project area. All projects must be completed by December 2026, which is likely sooner than Vero’s proposed project will be completed. The EA fails to consider the effect of Digital 299 on Utilities/Service Systems category. This project should be postponed until all state middle-mile projects are completed so the environment along Highway 299 is not disrupted twice. The project analysis does not take this legislation into account.</p> <p>There is already existing fiber optic infrastructure between Weaverville and Redding. AT&T has fiber optic infrastructure running south along Highway 299 from Weaverville, then along Highway 3 to Deerlick Springs Road, then south to Highway 36 and east to Red Bluff. Additionally, there is currently existing Federally-owned fiber optic infrastructure running along high-voltage transmission lines between Weaverville and Redding that will soon be made available for commercial access. Given these two existing diverse paths, an additional path is not necessary given the amount of environmental disruption it will cause.</p>	<p>Comment noted. Per Chapter 3 of the EA, utilities and service systems in the Action Area would not be impacted by the Project, which is compatible with existing land uses. The middle-mile portion of Digital 299 is expected to be completed in 2024.</p>
2/2/2022	Public	Travis Finch, Velocity Communications	Letter	Biological Resources	<p>5. Irregularity of Adopting Out-of-Date CEQA Studies from Prior Project Proponent</p> <p>Vero’s submission contains numerous references to analysis of the prior project proponent, Inyo Networks. It is unclear why or how Vero decided to adopt analysis conducted by or for a different proponent, but it appears that much of this re-used analysis is dated. For example, The Special-Status Plant Surveys dates to mid-2019. Due to ongoing drought and fires in the project area, environmental conditions have likely caused changes in vegetation that need to be revisited. Similarly, any analysis of wildfire threats dated in 2018 or 2019 are seriously out of date and fail to reflect the increasingly common and disastrous wildfires suffered in Northern California. The EA concludes in the analysis of hazards that wildfire threats are limited to the installation phase of the project when equipment could create sparks or from operation of backup power generators. The EA fails to take account that the Commission has found that communications equipment can cause wildfires during operation (e.g. the Guejito Fire in 2007 apparently caused by Cox Communications overloading wires).</p>	<p>The contractor that has performed the work since the beginning and prepared the initial studies is still the primary contractor. Agencies worked with the contractors to update the analysis as conditions changed due to wildfire and other climatic conditions that agencies have identified.</p> <p>As discussed in the Biological Evaluation and the Restoration Plan, Vero will conduct additional special-status plant surveys along the route as well as preconstruction vegetation surveys at work areas, ensuring that any changes in vegetation composition are documented prior to beginning construction. The environmental analysis has been updated to reflect changes resulting from the 2021 Monument Fire.</p>
2/2/2022	Public	Travis Finch, Velocity Communications	Letter	Socioeconomics	<p>6. Economic Justifications for Environmental Effects Lack Support</p> <p>Section 3.10.4.1 of Vero’s Environmental Assessment/Initial Study attempts to justify the environmental effects of the project on purported economic benefits. Vero asserts there is a potential that the project “may” improve access to education, healthcare and financial services. Vero incorrectly assumes there is no existing broadband or access to Internet services, which is clearly incorrect. Except for a small portion of Highway 299, the vast majority of the populated project route has access to high-speed internet service.</p> <p>Vero acknowledges that existing local carriers expressed concerns about the project overbuilding their networks and addresses these concerns by claiming that it will “allow tie-ins along the line for local providers to tap into broadband and distribute across their networks.” Vero further claims that it will “...offer commercially reasonable rates that are fair and nondiscriminatory to local exchange carriers.” Vero provides no evidence or analysis to back up either of these claims. For example, Vero has not committed to specific rates, terms and conditions that will ensure non-discriminatory access and just and reasonable rates, nor has it provided examples of contracts entered with other carriers that incorporate this language.</p> <p>Despite the lack of evidence supporting Vero’s claims, the EA appears to have determined that negative environmental effects are justified by the purported public benefit of bridging the digital divide. The EA should be revised to require identification of specific customers that will benefit from Digital 299 before allowing the environmental effects acknowledged in the EA.</p>	<p>The middle-mile fiber optic cable will allow tie-ins for local carriers to tap into broadband and distribute across their networks. Specific rates, terms, and conditions would be determined in conversation with local carriers and cannot be known with certainty at the time of permitting.</p> <p>This project is specifically designed to provide a benefit to the vendors who would connect to the middle-mile infrastructure.</p>



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 2, 2022

Andrew Barnsdale, Senior Analyst
California Public Utilities Commission
Energy Division, Infrastructure Permitting and CEQA
505 Van Ness Avenue
San Francisco, CA 94102-3298
andrew.barnsdale@cpuc.ca.gov

SUBJECT: Review of the Environmental Assessment/Mitigated Negative Declaration for the Digital 299 Broadband Project, State Clearinghouse Number 2022010017, Shasta, Trinity, and Humboldt Counties

Dear Andrew Barnsdale:

The California Department of Fish and Wildlife (Department) has reviewed the Environmental Assessment/Mitigated Negative Declaration (EA/MND) for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, the Department administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code (FGC) that conserve the State's fish and wildlife public trust resources. The Department offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code section 21000 et seq. The Department participates in the regulatory process in its roles as Trustee and Responsible Agency to minimize Project impacts and avoid potential significant environmental impacts by recommending avoidance and minimization measures. These comments are intended to reduce the Projects impacts on public trust resources.

Project Description

The Project as described in the EA/MND is as follows:

Vero Fiber Networks, LLC proposes to install approximately 300 miles of new conduit and fiber optic cables to provide internet to unserved or underserved communities in northern California. The Project route generally follows the State Route 299 corridor through Trinity, Shasta, and Humboldt counties. Conduit would be installed within pre-disturbed road shoulders. The Project also includes the construction of up to five small

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regeneration buildings (ILA buildings) placed along the route. Some last-mile connections would be attached to utility poles during a second phase of the Project. State and federal agencies have collaborated to leverage a joint Environmental Assessment/Initial Study Mitigated Negative Declaration (EA/ISMND) and associated technical studies to support their separate decisions and permits.

CDFW Consultation History

The Digital 299 Project Team initiated consultation with the Department in May of 2019, and staff have since participated in meetings, document review, and development of minimization and avoidance measures for special-status species. The Department appreciates the level of coordination organized by Transcon Environmental amongst participating state and federal agencies and the incorporation of agency feedback throughout the planning process.

The Department has the following recommendations and comments as they pertain to biological resources:

Restoration Plan

The restoration plan (Appendix J of the EA/MND) has not been finalized according to avoidance, minimization, and mitigation measure BIO-3 (AMM BIO-3). The restoration plan reiterates AMM-BIO-3 at the beginning of the document in which it is clearly stated that seeding will be done with locally sourced native species. However, the project schedule on page 3 of the plan states in the late summer of 2022, *“species lists for seed mixes are drafted and sent to agencies for approval, and seeds are ordered from nurseries or California native seed companies.”*. The Department prefers seed to be locally sourced from where the restoration will take place and not purchased from nurseries or native seed companies unless it can be shown that the seeds were collected in the same vicinity as the project impact. The Department recommends inquiring with the various United States Forest Service districts to see if they have any locally collected seed and/or container stock that could be used for this project.

On page 5 of the restoration plan, a description of seeding methods is provided. The Department recommends adding in a sentence stating if invasive species are present at the site, they will be removed prior to manual seeding or hydroseeding. As currently described, it appears that seeding and/or hydroseeding will occur without hand pulling or reducing the amount of invasives first.

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Mitigation Measures

AMM BIO-8 Special-Status Plants

Avoidance, Minimization, and Mitigation measure AMM BIO-8 states that if a special-status species is found during pre-construction surveys, and cannot be avoided by a minor re-route, the Project biologist will contact the appropriate agency to discuss potentially salvaging the affected plants. The Department generally considers salvage and relocation (translocation) to be an ineffective way to compensate for permanent impacts to rare, threatened, endangered, and sensitive native plants (rare plants)¹. Rare plant translocations for mitigation have a low success rate (less than ten percent)² and the Department considers such efforts experimental, unless they have been demonstrated to be effective through long-term experimentation. Successful rare plant translocations require many years of habitat surveys, habitat modeling, site selection, seed collection, plant propagation, site preparation, monitoring, and remedial actions such as management of competing plants, supplemental watering, and supplemental planting. Success is not guaranteed, and even translocations that are initially successful may fail to persist over the long term.

Furthermore, transplantation efforts do not replace intact ecosystems or maintain the entire range of genetic diversity at the impact site. The presence of rare plants often signifies the presence of biogeographically important sites with unusual soil, microclimate, or other conditions that are not easy to identify and difficult or impossible to duplicate. Loss of genetic material from rare plant translocation may also hinder introduced populations from withstanding changing environmental conditions over time. Conservation translocation of plants requires consideration of a number of factors that might not be considered for animal species, such as microclimate, soil, pollinators, herbivory, weed management, mycorrhizal associations, and adequate monitoring that could reasonably span many years. These factors considerably increase the complexity and risk of failure of plant translocations. The most effective way to mitigate for permanent loss of rare plant habitat is therefore to protect and manage existing populations in their natural habitat. If protection of the population is not possible, mitigation may be required to reduce significant impacts to less than significant.

AMM BIO-9 Invasive Species Prevention

AMM BIO-9 states, “*Contractor vehicles, equipment, tools, boots, and clothing will be cleaned inside and out prior to mobilization of Project segments on federal lands or California Department of Transportation ROW to limit the introduction on non-native species and pathogens (e.g., Port Orford cedar root fungus) on the Project*

¹ Department of Fish and Wildlife. November 16, 2017. *Policy and Procedures for Conservation Translocations of Animals and Plants*. Bulletin Number 2017-05.

² Fiedler, Peggy L. 1991. Final Report Mitigation-Related Transplantation, Relocation and Reintroduction Projects Involving Endangered and Threatened, and Rare Plant Species in California.

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corridor, including in areas potentially affected by recent wildfire.” The cleaning of vehicles, equipment, tools, boots, and clothing should occur project wide and not only on federal lands or Caltrans rights-of-way. Linear projects that include ground disturbance may facilitate infestations of invasive species over a great distance. It is vitally important that impacts from this Project do not increase the amount of invasive species or introduce new species. The Department suggests the beginning of AMM-BIO-9 read as such:

Contractor vehicles, equipment, tools, boots, and clothing will be cleaned inside and out to limit the introduction on non-native species and pathogens (e.g., Port Orford cedar root fungus) on the Project corridor, including in areas potentially affected by recent wildfire.

AMM BIO-13 Nesting Birds

The Department typically recommends February 1 – August 31 for the nesting bird season to capture early nesters such as great horned owl or bald eagle and late nesters or second broods. The Department suggests replacing February 15 with February 1 or adding “other early nesting raptors” to the first sentence so it reads as follows (changes in bold):

If work will occur during the nesting bird season (February 15 until August 31 OR January 1 until August 31 where there is potential for nesting eagles **and other early nesting raptors**), nesting bird surveys will be conducted within 7 days prior to the onset of construction by a Project biologist or biological monitor familiar with the species that may nest in the Action Area with standard nest-locating techniques.

AMM BIO-14 Aquatic Resources/Fisheries

Federally listed, state listed, and dually listed species occur on this Project. The first sentence measure AMM BIO-14 should read (changes in bold):

To avoid and minimize adverse effects to federally **and state**-listed and special-status fish and wildlife, the following measures shall be implemented:

AMM BIO-15 Special-Status Amphibians

The measure should read (changes in bold):

When ground-disturbing work is occurring within **100** ~~25 to 50~~ feet of waterways that have water present and that are suitable habitat for

Andrew Barnsdale, Senior Analyst
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special-status amphibians, a qualified biologist will conduct a pre-disturbance survey for special-status amphibians (adults, subadults, tadpoles, or egg masses). The survey area will include suitable habitat within ~~100 50~~ feet of perennial and intermittent waterways, within 25 feet of ephemeral drainages, and at least ~~100 50~~ feet upstream and downstream of the work area. The biologist will conduct surveys for special-status amphibians prior to the start of ground-disturbing activities. If no special-status amphibians are detected, work may resume for 3 to 5 days before new surveys need to be conducted.

AMM BIO-17 Special-Status Mammals


AMM-BIO-17 states pre-disturbance denning mammal surveys at den sites within the construction corridor will be conducted in suitable denning habitat. Please provide more description on exactly how these surveys will be conducted and what methods will be used to identify denning areas.

Survey Results

If any special-status species are found during surveys, the Department requests that CNDDDB forms be filled out and sent to Sacramento and a copy of the form be sent to the Regional office at the above address. Instructions for providing data to the CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The results of all pre-construction surveys shall be sent electronically to the Department at R1CEQARedding@wildlife.ca.gov.

If you have any questions, please contact Amy Henderson, Senior Environmental Scientist (Specialist), at (530) 598-7194, or by e-mail at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

1D82ADE7303A474...

Tina Bartlett, Regional Manager
Northern Region

ec: State Clearinghouse
state.clearinghouse@opr.ca.gov

Ec's continued on page 6

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California Public Utilities Commission
February 2, 2022
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Tommy Alexander, Project Manager
Transcon Environmental
talexander@transcon.com

Michael van Hattem, Adam McKannay, Amy Henderson and Greg O'Connell
California Department of Fish and Wildlife
R1CEQARedding@wildlife.ca.gov, ceqareferrals@wildlife.ca.gov

DEPARTMENT OF TRANSPORTATION

1657 RIVERSIDE DRIVE
REDDING, CA 96001
PHONE (530) 945-4323
FAX (530) 225-2459
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

February 1, 2022

Mr. Alexander
Environmental Planner
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

Dear Mr. Alexander:

The California Department of Transportation (Caltrans) has reviewed the Environmental Assessment/Initial Study Mitigated Negative Declaration for the Digital 299 Broadband Project proposed by Vero Fiber Networks. Caltrans is a Responsible Agency through our discretionary approval authority, as provided in Section 670 of the Streets and Highway Code, to approve projects that encroach within the State's highway right of way.

Caltrans offers the following comments and recommendations for this project in our role as a Responsible Agency pursuant to the California Environmental Quality Act (CEQA).

CEQA Environmental Checklist Form; question a) of section IV. BIOLOGICAL RESOURCES

The document states: "If Vero Fiber Networks (Vero) trenches through dry waterways or places bore pits in vegetated areas, impacts to special-status species, waterways and sensitive habitats could occur. Mitigation measures described in the Restoration Plan will contribute to reducing impacts to a less than significant level".

Based on the subsequent special status species discussions it appears as though these statements are in reference to potential project-related impacts to special status plants and fungi. The document goes on to include a discussion of theoretical impacts to these species but fails to discuss rationale (e.g. qualitative or quantitative) regarding the significance of such impacts prior to the

implementation of mitigation measures. Accordingly, it is difficult to understand how the proposed mitigation would reduce impacts to less than significant.

CEQA Environmental Checklist Form; question b) of Section IV. BIOLOGICAL RESOURCES

Although this section states that the project would have an impact of *Less Than Significant with Mitigation Incorporated*, it fails to discuss what significant project-related impacts to riparian habitat or other sensitive natural community would occur, what mitigation measures are proposed to address such impacts, and how they would reduce the impacts to less than significant.

For questions a) and b) the document should clearly define (quantitatively and qualitatively) the anticipated project-related significant impacts prior to the implementation of mitigation, mitigation measures to address significant impacts, and how such measures would reduce the impacts to less than significant.

CEQA Environmental Checklist Form Section V. CULTURAL RESOURCES

Caltrans understands that compliance with Section 106 of the National Historic Preservation Act is pending. Upon completion Caltrans will use the final Section 106 documentation to ensure compliance with Public Resources Code 5024 and Governor's Executive Order W-26-92, addendums 2019. It should be noted that if the results of the Section 106 compliance effort contradict the findings in the ISMND, Caltrans may not be able to use the EA/ISMND when acting as a Responsible Agency.

When acting as a Responsible Agency, CEQA guidelines Section 15096, subdivision (f) require Caltrans to consider the CEQA environmental document prepared by the Lead Agency prior to reaching a decision on the project. Addressing these comments will assist Caltrans in the consideration of the EA/ISMND and facilitate the issuance of an encroachment permit.

Mr. Alexander
2/1/2022
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Thank you for the opportunity to comment on the EA/ISMND for the project. If you have any questions regarding these comments please contact me at (530) 945-4323 or emiliano.pro@dot.ca.gov.

Sincerely,

Emiliano Pro

Emiliano Pro
Senior Environmental Planner
Caltrans – North Region

CC Andrew Barnsdale
California Public Utilities Commission
Energy Division, CEQA Unit



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

January 10, 2022

Mr. Andrew Barnsdale
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Andrew.Barnsdale@cpuc.ca.gov

MITIGATED NEGATIVE DECLARATION FOR DIGITAL 299 BROADBAND PROJECT – DATED JANUARY 2022 (STATE CLEARINGHOUSE NUMBER: 2022010017)

Dear Mr. Barnsdale:

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for Digital 299 Broadband (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

DTSC recommends that the following issues be evaluated in the MND Hazards and Hazardous Materials section:

1. The MND should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The MND should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel

additive in California. Tailpipe emissions from automobiles using leaded gasoline contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the MND.

3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the MND. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 [Abandoned Mine Land Mines Preliminary Assessment Handbook](#)
4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#).
5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to [DTSC's 2001 Information Advisory Clean Imported Fill Material](#).
6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the MND. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 [Interim Guidance for Sampling Agricultural Properties \(Third Revision\)](#).

DTSC appreciates the opportunity to comment on the MND. Should you need any assistance with an environmental investigation, please visit DTSC's [Site Mitigation and Restoration Program](#) page to apply for lead agency oversight. Additional information regarding voluntary agreements with DTSC can be found at [DTSC's Brownfield website](#).

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Gavin McCreary". The signature is fluid and cursive, with the first name "Gavin" and last name "McCreary" clearly legible.

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

From: Keefe, Timothy M@DOT
To: Tommy Alexander
Subject: RE: Digital 299 Weekly Update 1/7
Date: Monday, January 10, 2022 11:38:28 AM
Attachments: [image001.jpg](#)

Thanks Tommy,

The explanation how this was a secondary line was very useful. I believe I noted the details of how this should be described construction wise as being totally located in the roadway fill as it crossed the island. In future, if the line was to be permitted here, the details could be revised with what was needed to truly confirm avoidance.

Tim Keefe
Environmental Senior/Archaeologist
Cultural Resources North, Unit 03-4313
Caltrans North Region/District 1
707-572-7084

From: Tommy Alexander <talexander@transcon.com>
Sent: Friday, January 7, 2022 6:14 PM
To: Keefe, Timothy M@DOT <timothy.keefe@dot.ca.gov>
Subject: FW: Digital 299 Weekly Update 1/7

EXTERNAL EMAIL. Links/attachments may not be safe.

Tim,

I accidentally left you off this email—sorry about that. Thanks for attending the D299 Core Team meeting this week.

To follow up on our conversation, I confirmed that it was indeed the Table Bluff group of the Wiyot tribe that requested to consult on the project. Per the attached letter, we addressed the CRIR to:

Ted Hernandez, Chairperson
Wiyot Tribe
1000 Wiyot Drive
Loleta, CA 95551

Thanks,
Tommy

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name:

Cheryl Arnold

Address:

PO Box 218
Lewiston CA 96052

Phone (optional):

E-mail (optional):

Organization (if applicable):

COMMENT

(use back-side or additional paper if necessary)

Would love to see the
estimated time line for each step
(area) of installation in Phase II
Also, estimated monthly cost per
household.

Withhold personal information*:

☐ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Cheryl Arnold


Date:

1/27/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.


John P. Arnold
PO Box 218
Lewisston, CA 96052

Tommy Alexander, Robert May
Trancon Environmental
862 Montgomery St
San Francisco, CA 94133

9413385147 0004

POSTNET
9413385147 0004



DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Roger Brown
Address: P.O. Box 404
Willow Creek Ca 95573
Phone (optional): _____
E-mail (optional): _____
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

What would be back up if damage occurred
this Area is known for slides with equipment
digging into Roadways & sides.

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☐ Yes ☐ No

Signed: Roger Brown

Date: 1/18/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Mike Colucci
Address: #30 A MiCasa Ln
Big Bar Ca 96010
Phone (optional): 530 227-6343
E-mail (optional): _____
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I would like to see this in
my area sooner the better

Withhold personal information*: ☐ Yes ☒ No

I want to be included on the mailing list for additional information: ☐ Yes ☐ No

Signed: Mike Colucci Date: 1/12/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

FROM: Colin
Box 551
Red Ben Ca 96010

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____



MRS. PATRICIA ANNE FLEISCHNER
P.O. Box 1010
Trinidad, CA 95570

Address: _____

Phone (optional): _____

E-mail (optional):

baycity@sonic.net (do not show, please)

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

This project does not seem to directly affect Trinidad,
about 12 miles north of the 299-101
intersection, however, when and if your broadband
work extends to our rural, underserved, and
abysmally inadequate internet capability area,
we would be pleased to hear of such
developments. The old Redwood Highway 1 (Sonic
Drive) is particularly under served.

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Patricia Fleischer

Date:

1-10-2002

Please send comments by **February 2, 2002** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

|||||.....|||||.....|||||.....|||||.....

94133-514703

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



EUREKA CA 955
11 JAN 2022 PM 1 L

MRS. PATRICIA ANNE FLESCHEK
P.O. Box 1010
Trinidad, CA 95570



FROM:

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Linda K. Glaros
Address: 851 Mountain View Dr.
Trinity Center, Ca
Phone (optional): 1-707-589-5848
E-mail (optional): lglaros@gmail.com
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I am happy to be able to get the Broadband
Project up to us.

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: Linda K. Glaros Date: 1-7-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

9413885147 0004 01/08

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

EUREKA CA 955
7 JAN 2022 PM 1 L
FOREVER USA

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUE):

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: LAUDERDALE MOTORS
Address: P.O. Box 1108 - Weaverville, CA 96093
Phone (optional): 530-623-2442
E-mail (optional): office@lauderdalemotors.com
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

Bring It!

Withhold personal information*: ☐ Yes ☒ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: 

Date: 01-10-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Tsuungwe Council
Address: PO Box 373
Salyer, CA
Phone (optional): _____
E-mail (optional): magdalesos@aol.com
Organization (if applicable): Tsuungwe Tribe

COMMENT

(use back-side or additional paper if necessary)

We oppose the plan. There has
been no effort to consult
with our tribe.

Withhold personal information*: ☐ Yes ☒ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: Dona Magdalena Elder Date: 1/25/2022
for Tsuungwe Council

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Aldena A. Magdaleno
Address: PO Box 56
Salyer, CA 95563
Phone (optional): _____
E-mail (optional): magdalenos@aol.com
Organization (if applicable): SF Trust

COMMENT

(use back-side or additional paper if necessary)

The change from the Inyo project
plans leave South Fork Rd with-
out access.

I oppose the change on behalf
of our Trust.

Withhold personal information*:

☐ Yes

☒ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Aldena A. Magdaleno

Date:

1/25/2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: David McCoy

Address: P. O. Box 163

Burnt Ranch CA. 95527

Phone (optional): 707-298-4525

E-mail (optional): spearchuckerdave@yahoo.cpm

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I am deeply concerned by frontier blocking public access to this broadband project

I Initially protested their block with the FCC when this project was funded I filed

A written protest but it was ignored. Frontier is not a stable company not only

Has our area been out of service since July there is no cell service here we desperately
need some kind of communication here broadband could provide that with Wi-Fi calling

I respectfully ask that this broadband be access to the general public so they can benefit
by it it is deeply needed here in Rural Trinity county. 90% of our residents have no
communication right now broadband would provide that. Frontier is not the company
that can facilitate this.

Withhold personal information*:

☐ Yes

☒ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: David McCoy

Date: January 9, 2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: STEVE MORRIS
Address: 1500 Glendale Dr.
McKinleyville 95519.
Phone (optional): _____
E-mail (optional): STEVE@STEVENMORRISLOGGING.COM.
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

Cut through the red tape and build the
project. Minimal environmental impact. Huge step
forward for communication in rural areas.

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☐ Yes ☒ No

Signed: Steve Morris Date: 2/6/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I just want to say I am looking forward
to the Broadband Project to be finished. It will
be so nice to use it
Thanks so much

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: _____

Pamela Wood

Date: _____

Jan 13 2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

01/15

54133151

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

FROM:
Pamela Howell
3269 Lucia Ave
Eureka, Ca
95503

13 JAN 2022 PM 1 L

EUREKA CA 955

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: BILLY OAKES
Address: 129 WHITE HOUSE GULCH - SALYER, CA, 95563
PO BOX 129 SALYER CA 95563-0129
Phone (optional): _____
E-mail (optional): OAKESBILLY@HOTMAIL.COM
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

WHAT PROVISIONS, IF ANY, ARE THERE FOR "END USE"
CUSTOMERS. I.E. RESIDENTS ALONG THE 299 CORRIDOR,
SPECIFICALLY IN THE SALYER AREA?
IF NONE, HOW DOES THIS ENHANCE RURAL ACCESS
TO THE FIBER/BROADBAND GOING THROUGH OUR AREA?

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: 

Date: 1-10-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Patricia Oakes
Address: 129 White House Gulch (PO Box 129)
Salyer CA 95563
Phone (optional): 530-629-3564
E-mail (optional): ~~trish.oakes@dqwc.org~~ trish.oakes@dqwc.org
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

Primary concern is guarantee that our local community
SALYER and also BURNT RANCH residents
we be OFFERED digital service.
Right now we are in an information wasteland.
No phones, routine power outage, expensive.
We pay over \$200 month for
basic land line phone that seldom works and
Broadband 150 G / month.

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed:  Date: 1-10-2021

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.



94139-514703

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



12 JAN 2022 PM 1 L

EUREKA CA 955

FROM:

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name:

Bob Shufelberger

Address:

10557 April Lane

Palo Cedro, Ca. 96073

Phone (optional):

E-mail (optional):

Organization (if applicable):

COMMENT

(use back-side or additional paper if necessary)

Property address (no mail)

6100 Hwy 273

Anderson, Ca. 96007

Withhold personal information*:

☐ Yes

☒ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

B. Shufelberger

Date:

1-8-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager

Transcon Environmental

802 Montgomery Street

San Francisco, CA 94133

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DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Gary & Nancy Standley
Address: P.O. Box 426 Salyer Ca 95563
863 Hawkins Bar Road Salyer Ca 95563
Phone (optional): 530-629-2415 (Not working since 12/26/21 due to snow storm)
E-mail (optional): _____
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

We are senior citizens who frequently experience power and phone (landline) outages. There are no Cell Towers near us and our Cell phones are not accessible except with Satellite Wifi. Fires over the years have isolated us along with the recent unprecedented snow storm. Tower has been out as long as 2+ weeks at a time. Landlines have been out for over 2 months at a time. 299 has been experiencing full closures frequently. Thus we frequently are physically as well as electronically isolated. Acquiring emergency access and/or information is very limited.

Withhold personal information*:

☐ Yes

☒ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Gary & Nancy Standley

Date:

1/13/2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: Sandra Sterrenberg
Address: 610 Hennessy Road
Burnt Ranch, CA. Trinity County
Phone (optional): 530 629-2663 530 739-2284
E-mail (optional): ssterre@the-grid.net
Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

We have concerns that this project will
bypass our communities along the
Trinity River and Highway 299, offering no
way to access service.

We are very isolated here with no land lines because
Frontier is an incompetent company and no cell
access. For our safety + civic participation, we need
digital Broadband.

Withhold personal information*:

☐ Yes

☒ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Sandra Sterrenberg

Date:

Jan. 12, 2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I think it's terrible that the path for the line follows Hwy 299, then breaks away at Big Bar, continues to Underwood Mtn Rd, before rejoining Hwy 299. It skips many of us who have been supporting this project for years. We will not be supporting it any more. Hope you go out of business when Musk gets his Star Line project up and running.

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☐ Yes ☒ No

Signed: _____

Date: _____

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

* Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: John P. Wilson
Address: 6281 Center Dr.
Redding, Ca. 96001
Phone (optional): 530/949-4900
E-mail (optional): jwilson637@aol.com
Organization (if applicable): Safety on Sight

COMMENT

(use back-side or additional paper if necessary)

I want to be an Inspector!

Withhold personal information*: ☐ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: John P. Wilson

Date: 1-7-2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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**COMMENTS OF VELOCITY COMMUNICATIONS, INC.
IDENTIFYING DEFICIENCIES IN DIGITAL 299 PROJECT
ENVIRONMENTAL ASSESSMENT**

The Environmental Assessment (“EA”) for Vero Fiber Holdings’ (“Vero”) Digital 299 Broadband Project incorrectly concludes that the project will have a less than significant effect on the environment on several key factors under CEQA. To remedy these errors, Vero should be required to conduct additional studies and submit the updated research to the Commission for evaluation.

1. The EA Incorrectly Concludes that All Aerial Segments Will Use Existing Utility Poles

The EA concludes that Digital 299 will have no impact or less than significant impact on scenic vistas and resources. This conclusion rests on a conclusory statement with no apparent factual analysis that fiber and equipment will be hung on existing utility poles and bridges. This conclusion is deficient for several reasons.

First, the level of detail on the project map and in the project description for aerial construction is not sufficient and does not identify specific existing poles. Section 2.2.2.2 states “It is possible that existing poles would have to be replaced if existing poles are overburdened. Locations of such replacements are not known at this time...” The EA makes no effort to determine the effect if numerous poles must be replaced. Based on local observation, many poles in the project area are either overloaded or in bad repair. No analysis of existing pole condition has been presented. If poles are not usable, they will need to be replaced, resulting in ground disturbance for which there has been no archeological, biological or botanical analysis or Native American consultation. In addition, Vero might choose not to replace a degraded or overloaded pole but instead to place a new pole nearby and leave in place the existing pole (though topped off to a shorter height) creating a proliferation of “Buddy” poles that affect the aesthetics in a highly scenic area dependent on tourism and recreational uses.

2. The EA Does Not Analyze Alternative Proposed Aerial Construction on Scenic Highway

The EA anticipates that virtually all of the construction along Highway 299, a scenic highway, will be done with underground boring, trenching, or plowing, with a sufficient level of analysis. Section 2.3.1, however, presents an *Aerial Construction* alternative, but does not provide much analysis other than to state that “...there is no continuous existing pole line along the SR 299 corridor”. Many areas in the project, such as Burnt Ranch, will not accommodate boring or trenching along the roadway due to geology or ROW width and will likely require the use of aerial construction, however this is not addressed.

The installation of poles and aerial fiber optic lines in rocky areas with narrow ROW, particularly along the Wild and Scenic Trinity River, will greatly degrade aesthetics. The presence or absence of existing poles in areas designated for aerial construction is also

not addressed. Based on local observation, several areas designated for aerial construction do not have existing poles and will require them to be installed, causing ground disturbance and degradation of aesthetics. The entire project could likely shift from a very small amount of aerial construction to a significant amount based on geology. One of the reasons given for Inyo Networks abandoning the project was due to the fact that CalTrans did not want underground cable installed along certain portions of Highway 299. Vero should be required to provide a detailed analysis of the likelihood of obtaining Caltrans permits for underground installation of its facilities and analysis of the environmental effect of shifting to a substantial amount of aerial installation and submit a revised *Aerial Construction* alternative.

3. EA Fails to Analyze Traffic Disruption for Areas Highly Dependent on Tourism Access

The EA incorrectly concludes that traffic disruption from this project is “less than significant”. Anywhere from 1,600 to 9,600 cars travel along Highway 299 every day depending on the location. Trinity County has economically suffered for years from disrupted traffic on Highway 299 due to rockslides, fires, and most recently storm damage. The Monument Fire in 2021 caused widespread economic hardship resulting in the closure of multiple local businesses. Disrupting traffic along this route for the duration of this project will cause loss of revenue to tourism, hospitality, and recreation-based businesses which are already struggling.

4. EA Fails to Consider Effect of Digital 299 on Utility Service from State Fiber Middle Mile Network

Senate Bill 156 was signed into law in July of 2021 and provides \$3.25 billion to create a state-owned, open-access middle-mile network throughout California. Highway 299 has been identified as a potential project area. All projects must be completed by December 2026, which is likely sooner than Vero’s proposed project will be completed. The EA fails to consider the effect of Digital 299 on Utilities/Service Systems category. This project should be postponed until all state middle-mile projects are completed so the environment along Highway 299 is not disrupted twice. The project analysis does not take this legislation into account.

There is already existing fiber optic infrastructure between Weaverville and Redding. AT&T has fiber optic infrastructure running south along Highway 299 from Weaverville, then along Highway 3 to Deerlick Springs Road, then south to Highway 36 and east to Red Bluff. Additionally, there is currently existing Federally-owned fiber optic infrastructure running along high-voltage transmission lines between Weaverville and Redding that will soon be made available for commercial access. Given these two existing diverse paths, an additional path is not necessary given the amount of environmental disruption it will cause.

5. Irregularity of Adopting Out-of-Date CEQA Studies from Prior Project Proponent

Vero's submission contains numerous references to analysis of the prior project proponent, Inyo Networks. It is unclear why or how Vero decided to adopt analysis conducted by or for a different proponent, but it appears that much of this re-used analysis is dated. For example, The Special-Status Plant Surveys dates to mid-2019. Due to ongoing drought and fires in the project area, environmental conditions have likely caused changes in vegetation that need to be revisited. Similarly, any analysis of wildfire threats dated in 2018 or 2019 are seriously out of date and fail to reflect the increasingly common and disastrous wildfires suffered in Northern California. The EA concludes in the analysis of hazards that wildfire threats are limited to the installation phase of the project when equipment could create sparks or from operation of backup power generators. The EA fails to take account that the Commission has found that communications equipment can cause wildfires during operation (*e.g.* the Guejito Fire in 2007 apparently caused by Cox Communications overloading wires).

6. Economic Justifications for Environmental Effects Lack Support

Section 3.10.4.1 of Vero's Environmental Assessment/Initial Study attempts to justify the environmental effects of the project on purported economic benefits. Vero asserts there is a potential that the project "may" improve access to education, healthcare and financial services. Vero incorrectly assumes there is no existing broadband or access to Internet services, which is clearly incorrect. Except for a small portion of Highway 299, the vast majority of the populated project route has access to high-speed internet service.

Vero acknowledges that existing local carriers expressed concerns about the project overbuilding their networks and addresses these concerns by claiming that it will "allow tie-ins along the line for local providers to tap into broadband and distribute across their networks." Vero further claims that it will "...offer commercially reasonable rates that are fair and non-discriminatory to local exchange carriers." Vero provides no evidence or analysis to back up either of these claims. For example, Vero has not committed to specific rates, terms and conditions that will ensure non-discriminatory access and just and reasonable rates, nor has it provided examples of contracts entered with other carriers that incorporate this language.

Despite the lack of evidence supporting Vero's claims, the EA appears to have determined that negative environmental effects are justified by the purported public benefit of bridging the digital divide. The EA should be revised to require identification of specific customers that will benefit from Digital 299 before allowing the environmental effects acknowledged in the EA.

February 2, 2022

Submitted by Travis Finch, tf@velotech.net.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☐ Yes

☐ No

Signed: _____

Date: 1-13-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

13 JAN 2022 PM 1 L

EUREKA CA 955



Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name:

Address:

Phone (optional):

E-mail (optional):

Organization (if applicable):

COMMENT

(use back-side or additional paper if necessary)

WILL THIS ALSO PROVIDE CELL COVERAGE ??

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Date:

01/06/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager

Transcon Environmental

802 Montgomery Street

San Francisco, CA 94133

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94133-94133

94133-94133

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

FOREVER USA



8 JAN 2022 PM 7 L

SACRAMENTO CA 957

Thank you for your comment!

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Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I think service is important. But that leads to several concerns.
What will the cost be to residents along 299?
How is the line/service laid?
Will there be debris into the river?
Will there be any potential injuries to birds fish & wild life?

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: _____

Date: 1-20-22

Please send comments by February 2, 2022 to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

There is no map included in this mailing!

You repeat 1 paragraph - that it was "on hold"

Please send me a MAP of where this will be constructed and how it will →

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed: _____

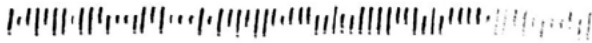
Date: _____

1-06-2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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9413385147 0004

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

Thank you for your comment!

To return via mail:

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add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

Impact US. You can do this
by mail.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name:

Address:

Phone (optional):

E-mail (optional):

Organization (if applicable):

COMMENT Questions

(use back-side or additional paper if necessary)

- 1) What is the current estimate ^(when) of home connections in Lewiston?
- 2) What will be the provided speed and fee to end user?
- 3) I live on the spur off segment 21 on Viola Ln -

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed:

Date:

1/8/22

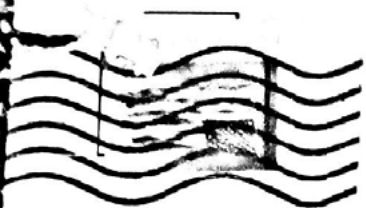
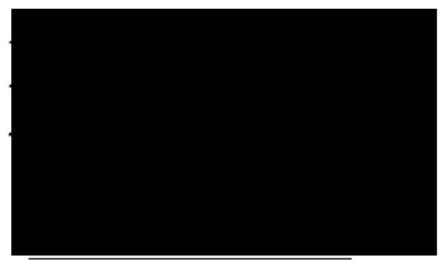
Please send comments by February 2, 2022 to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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94133-514703

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



SACRAMENTO CA 957
10 JAN 2022 PM 6 L

Thank you for your comment!

To return via mail:

Fold in thirds so address (above) is showing,
add postage, tape bottom of fold, and mail.
Please postmark by February 2, 2022

COMMENT CONTINUED:

Handwritten comment area with multiple horizontal lines for text entry.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

IT'S A GREAT IDEA, IT'S ABOUT TIME
GREAT INVESTMENT FOR THE FUTURE

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☐ Yes ☒ No

Signed: _____

Date: _____

1-6-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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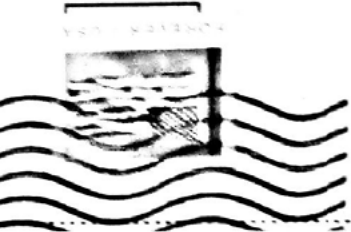
Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

13 JAN 2022 PM 1 L

EUREKA CA 955



Thank you for your comment!

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Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

I am concerned about the fragile soils of the Titlow Hill area. My hope is that it follow Hwy 299, not the proposed alternate route that does not follow Hwy 299.

I would like to request last-mile connections for rural communities along the way, specifically Chezem Road neighborhood in Humboldt County.
Thank you.

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed: _____

Date: _____

1/19/2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

SACRAMENTO CA 957
1 FEB 2022 PM 3 L



Thank you for your comment!

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COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

OBJECTIONS TO AERIAL ATTACHMENTS ALONG DEADWOOD
ROAD FROM MCCOLM DRIVE THROUGH
COMMUNITY ACCESS ROAD & ACROSS RIVER BROW
AT SAID POINTS AND TO ANY USE OF OTHER UTILITY
POWER POLES (PUD/PGE) JOINT POLE AGREEMENTS & NO ALL
PER TELEPHONE CHAT WITH JOSH NELSON 1/31/22.
UNDERGROUND EASEMENT AT RIVER SIDE OF MCCOLM
SUBDIVISION TO BE NEGOTIATED UPON REQUEST.

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: _____

Date: _____

1/31/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

Thank you for opportunity to comment.

To speed up broadband access to rural areas along Hwy 299 (eg. Burnt Ranch, Willow Creek, please consider putting cell towers in strategic areas along Hwy 299 (top hills/mountains) so that cellular modems could be used by rural residents. This will greatly improve & enhance livelihood and economic vitality of residents and communities. Thanks!

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: _____

Date: _____

1/7/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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|||||

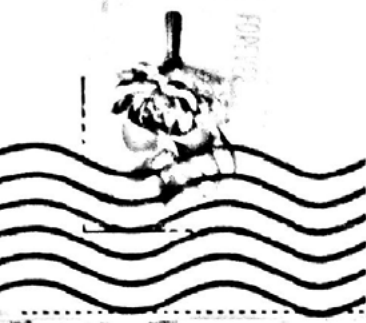
94133-514703

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

EUREKA CA 955
10 JAN 2022 PM 1 L



Thank you for your comment!

To return via mail:

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add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

This will also improve & enhance remote working,
education and business expansion (which increases
broadband usage). Children are our future,
so enhancing learning opportunities via
broadband is good long term planning.

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

Please continue this project. Your commitment to completing this action is very much desired.

Withhold personal information*:

☒ Yes

☐ No

I want to be included on the mailing list for additional information:

☒ Yes

☐ No

Signed: _____

Date: _____

1-18-22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name: _____

Address: _____

Phone (optional): _____

E-mail (optional): _____

Organization (if applicable): _____

COMMENT

(use back-side or additional paper if necessary)

*Would Love to see this happen
in our area -*

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☒ Yes ☐ No

Signed: _____

Date: _____

1/19/22

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133



FROM:

EUREKA CA 955
31 JAN 2022 1PM 1 L



Thank you for your comment!

To return via mail:

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add postage, tape bottom of fold, and mail.

Please postmark by February 2, 2022

COMMENT CONTINUED:

DIGITAL 299 BROADBAND PROJECT

NEPA/CEQA PUBLIC REVIEW COMMENT FORM

Name:

Address:

Phone (optional):

E-mail (optional):

Organization (if applicable): life-long resident here, parent and business owner.

COMMENT

(use back-side or additional paper if necessary)

I do not support this project. We do not want or need this in our area. We love the way we live here. We, as a community, reject your proposal.

We do not want growth, change, higher speeds wider roads etc. We want it to stay the way it is. Leave us alone. Please stay out of here! We say NO!

Withhold personal information*: ☒ Yes ☐ No

I want to be included on the mailing list for additional information: ☐ Yes ☐ No

Signed:

Date: 1-25-2022

Please send comments by **February 2, 2022** to:

Tommy Alexander, Project Manager
Transcon Environmental
802 Montgomery Street
San Francisco, CA 94133

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