

1.9 COMMENT SET E

Email received by Steven Mindt of the CSLC from Larry Freeberg of the Chambers Group, Inc. on August 1, 2008.

JOINT BLM AND SLC MND FOR AT&T FIBER OPTIC CABLE REPLACEMENT PROJECT

Document Accuracy and Consistency

Acreage Impacts

Page 4.4-18 states that project may result in temporary disturbance of "**34.3 acres**" of habitat potentially uses by desert tortoise and other special status species.

Page 5.2.3 states that project may impact approximately "**22.4 acres**" of predisturbed scrub vegetation.

AT&T's position: *The origin of these acreage numbers is unknown. The potential disturbance of the previously disturbed vegetation in the temporary ROW was previously calculated by BLM as 11.11 acres as reported in the BE/BO. Thus, these numbers (34.3 and 22.4) are not consistent with the BE/BO.*

Suggestion: *Delete these acreage numbers or replace them with 11.11.*

E-1

MM-WTR-01

Requires a map depicting the location of the SWPPP BMPs. "The map shall also illustrate the work areas, site perimeter (i.e., limits of disturbance or ROW width), access roads, access points from paved roads, relevant drainage areas, and materials storage yards."

AT&T's position: *AT&T will locate the SWPPP BMPs on the construction drawings. These drawings will be provided prior to start of construction. However, the other requested map information: access roads, access points from paved roads, relevant drainage areas is provided in the EA/IS/MND in great detail both in text and maps. The material storage yards are off the ROW in commercial locations yet to be determined by the construction contractor. Any additional maps would be redundant to those in the document.*

Suggestion: *Modify this requirement to only require showing the location of the SWPPP BMPs.*

E-2

1.10 RESPONSE TO COMMENT SET E

1.10.1 Comment E-1

We agree with the recommendations presented in Comment E-1. A review of pages 4.4-18 and 5-2 indicates that the analysis presented is incorrect. Early calculations assumed that the existing access roads were narrower and more heavily vegetated, resulting in an initial calculation of a maximum potential impact that was larger. Further review of the Biological Opinion and discussions with agency representatives resulted in revisions to the calculations presented in Table 2-3: Temporary Disturbance. During document revision, these acreages were not updated to reflect the latest calculations. The acreages presented on pages 4.4-18 and 5-2 should be replaced with 11.11 acres.

1.10.2 Comment E-2

We disagree with the recommendations presented in Comment E-2. The SWPPP will typically be maintained as a stand-alone document; therefore, the mapping and language describing these elements of the Proposed Project will not be available. In addition, the General Permit for Storm Water Discharges Associated with Construction Activity (General Permit) (Water Quality Order 99-08 DWQ) indicates the following objectives and required elements of a SWPPP:

The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of storm water discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in storm water as well as nonstorm water discharges. The SWPPP shall include BMPs which address source control and, if necessary, shall also include BMPs which address pollutant control.

Required elements of a SWPPP include: (1) site description addressing the elements and characteristics specific to the site, (2) descriptions of BMPs for erosion and sediment controls, (3) BMPs for construction waste handling and disposal, (4) implementation of approved local plans, (5) proposed post-construction controls, including description of local post-construction erosion and sediment control requirements, and (6) nonstorm water management.

It is a requirement of the SWPPP to identify the sources of sediment—such as access roads, access points from paved roads, storage yards—and to provide a complete site description. As a result, these mapping elements will remain as a requirement in the EA/MND.