

Appendix C: Responses to Comments on the Draft EIR

RTI Transpacific Fiber-Optic Cables Project

APPENDIX C: RESPONSES TO COMMENTS

Consistent with State California Environmental Quality Act (CEQA) Guidelines, Section 15088, the City of Hermosa Beach (City), as CEQA Lead Agency, has evaluated the comments on environmental issues received from persons who reviewed the Draft Environmental Impact Report (EIR) prepared for the Transpacific Fiber-Optic Cables Project (Project) and prepared written responses. The State CEQA Guidelines further require the City to describe in its written response the disposition of significant environmental issues raised (e.g., revisions to the proposed Project to mitigate anticipated impacts or objections). If the City’s position varies from recommendations and objections raised in the comments, the agency must address the major environmental issues raised and give details why any specific comments and suggestions were not accepted.

To facilitate review of specific comment letters and responses, a copy of each comment letter has been provided in Attachment A to this appendix and given a specific letter/number designation (Comment Set) and each individual comment has been assigned a number (A1-1, A1-2, etc.). Responses on the following pages use the same letter/number pattern as the comments. Table C-1 provides a list of parties that submitted comments on the Draft EIR, and the corresponding comment set number. Comment letters have been grouped into the following categories:

A. Comments and Responses to Comments from Public Agencies

B. Comments and Responses to Comments from Individuals

Table C-1. Written Comments Provided on Draft EIR and Comment Identification (ID) Numbers Used in this Final EIR

Commenter	Comment IDs	
	Set #	ID#
A – Agencies		
California Department of Transportation	A001	A1-1 to A1-3
California Department of Fish and Wildlife	A002	A2-1 to A2-9
B – Individuals		
Gifford Nowland	B001	B1-1
Mike Flaherty	B002	B2-1 to B2-4

A001 California Department of Transportation

Comment A1-1

The comment regarding the California Department of Transportation's (Caltrans) understanding of the proposed Project is acknowledged, as well as Caltrans' mission and information regarding CEQA review of transportation impacts using Vehicle Miles Traveled (VMT).

Comment A1-2

The comment that Project-related construction trips would result in short-term, temporary increases in construction-related traffic volumes is consistent with the analysis in EIR Section 3.11, *Transportation*.

Comment A1-3

A transportation permit will be obtained if the proposed Project requires the use of oversized transport vehicles. Mitigation Measure T-1 (Construction Traffic Control Plan) in EIR Section 3.11, *Transportation*, states that the delivery of construction materials during peak traffic periods will be prohibited to the maximum extent feasible.

A002 California Department of Fish and Wildlife

Comment A2-1

The comment that the California Department of Fish and Wildlife (CDFW) appreciates the opportunity to comment on the proposed Project is acknowledged.

Comment A2-2

The comment regarding CDFW's roles and responsibilities as California's Trustee Agency for fish and wildlife resources, native plants, habitat, marine biodiversity protection, and fisheries is acknowledged.

Comment A2-3

The CDFW's understanding and summary of the Project Description is acknowledged.

Comment A2-4

The comment regarding the marine biological significance of California's southern coast, commonly referred to as the Southern California Bight, as well as the City of Hermosa Beach's terrestrial biological significance, is acknowledged. Marine and terrestrial biological resources are discussed in EIR Section 3.4.1, *Environmental Setting*. EIR Section 3.4.1.5, *Marine Protected Areas*, states that the planned cable route does not pass through any designated Areas of Special Biological Significance (ASBS) for water quality.

Comment A2-5

As stated in EIR Section 3.4.3.3, *Impact Analysis*, the cable cannot be buried in hard-bottom habitat areas and would be laid on top of rocky substrate. The cable could move side-to-side (lateral movement) due to currents or wave swell, and this may result in persistent impacts on these areas as the cable moves with the current. However, according to Carter et al. (2009), studies that have compared communities adjacent to cables and communities not adjacent to cables have failed to observe differences, suggesting cable movements after installation have a negligible effect on seabed communities. To further minimize the potential for impacts, Mitigation Measure BIO-6 would be required to adjust the cable alignment within the boundaries of the surveyed route to avoid or reduce crossing hard-bottom substrate communities.

The encasement of the cable in a ductile cast iron pipe is a method typically employed in areas where the cables must be trenched in across the beach and reef areas, and then laid directly on the ocean floor through the surf zone. In those cases, a ductile iron pipe is trenched across the beach, and an articulated pipe is used to protect the cables through the surf zone and in shallow water up to about 30 feet in depth. These conditions are not applicable to the proposed Project, since a landing pipe would be installed using horizontal directional drilling (HDD), which eliminates the need for ductile iron or articulated pipe, since the landing pipe would extend well beyond the surf zone to a water depth of about 40 feet.

Under the most recent permit issued by the California Coastal Commission (CCC) in February 2023 for subsea cables, post-lay surveys of cables in State waters are required every 5 years after cable installation. No further surveys are required except in the case of a major event, such as an underwater landslide.

Comment A2-6

The comment regarding avoiding impacts on nesting birds for the entirety of the nesting season, as well as considering the nesting season for both the western snowy plover and California least tern, is acknowledged. The suggested changes to Mitigation Measure BIO-1 have been incorporated into EIR Section 3.4.3.3, *Impact Analysis*.

Comment A2-7

A reconnaissance survey conducted on May 7, 2019 of the terrestrial portion of the Project Area did not result in any detections of special status species or natural communities. Information on special status species or natural communities detected during future surveys will be submitted in a CNDDDB Field Survey Form, in accordance with CEQA.

Comment A2-8

The required environmental document filing fees will be paid upon filing of the Notice of Determination by the City as Lead Agency.

Comment A2-9

The comment that CDFW appreciates the opportunity to comment on the proposed Project is acknowledged. The contact information for marine and terrestrial issues are also acknowledged and will be utilized if further coordination is required.

B001 Gifford Nowland

Comment B1-1

The proposed cable landing sites at 6th Street or 10th Street were selected as options for the proposed Project based on consideration of conduit routes that would primarily be located within public streets and would not transect existing buildings. A landing site and associated conduit route along 16th Street to the power feed equipment (PFE) facility, located at 1601 Pacific Coast Highway, would have to cross through buildings on the Hermosa Valley School campus to reach the PFE facility. Therefore, a suggested route along 16th Street would not be feasible and would result in greater impacts on existing structures than the proposed 6th Street and 10th Street landing site options and associated conduit routes.

B002 Mike Flaherty

Comment B2-1

The commenter's support for the proposed Project is acknowledged.

Comment B2-2

The name of the greenbelt has been revised to be Hermosa Valley Greenbelt throughout the document.

Comment B2-3

The list of utilities and suggestion to create a mapping system to overlap existing utility systems is acknowledged. As discussed in EIR Section 2.4.2, *Terrestrial Construction*, prior to construction activities, all known underground utilities along the proposed terrestrial cable routes would be identified.

Comment B2-4

The comment that erosion was significant after recent heavy rains where the newest cable was installed in the areas south of 20th Street is acknowledged, as well as the need to consider erosion in future cable installations. EIR Section 3.6, *Geology and Soils*, addresses potential impacts related to soil erosion from terrestrial boring procedures. The analysis concludes that impacts would be reduced to less than significant with implementation of erosion control measures; the immediate backfilling of excavated areas and compaction of backfill material in compliance with Specifications for Public Works Construction, adopted by the City of Hermosa Beach in 2004; restoration of unpaved areas to their original contours; installation of erosion control devices at locations susceptible to erosion; and seeding, mulching, and fertilizing. Because excavated areas would be restored to their preconstruction conditions, the proposed Project would not substantially increase the potential for erosion in those areas.

Attachment A: Comments Received on the Draft EIR

RTI Transpacific Fiber-Optic Cables Project

DEPARTMENT OF TRANSPORTATION

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LOS ANGELES, CA 90012
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*Making Conservation
a California Way of Life*

October 18, 2023

Daniel Hortert
City of Hermosa Beach
1315 Valley Drive
Hermosa Beach, CA 90254

RE: RTI-I Transpacific Fiber-Optic Cables
Project
SCH # 2019080175
Vic. LA-01/PM 21.45
GTS # LA-2019-04308-DEIR

Dear Daniel Hortert:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The applicant proposes to install and operate up to two submarine fiber-optic cable systems with landing sites in Hermosa Beach. Terrestrial facilities (i.e., landing pipes, manholes, ocean ground beds, terrestrial cables, conduits, and an existing power feed equipment [PFE] facility), and marine components (i.e., marine conduits, marine cables, and cable regenerators) would be installed. An onshore landing site would be installed at either 6th Street or 10th Street to connect marine cables to a terrestrial conduit system and lead to an existing PFE facility.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<https://opr.ca.gov/ceqa/#guidelines-updates>

Project-related construction trips would not require a substantial or sustained increase in vehicle miles traveled (VMT) compared to regional averages, or result in temporary emission increases that could conflict with plans and policies related to the reduction of greenhouse gas emissions. Construction activities are anticipated to be intermittent over two phases, which would be completed approximately 2 years apart, in 2024 and 2026,

A1-1

A1-2

"Provide a safe and reliable transportation network that serves all people and respects the environment"

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respectively. These activities would generate short-term, temporary increases in construction-related traffic volumes. Daily passenger vehicle trips would be generated by worker commutes, and construction would include truck trips during the workday for the delivery of equipment and materials, movement of cut-and-fill material, watering for dust control, concrete delivery, disposal of waste, and other various construction needs. During peak construction, a maximum of 50 daily trips (38 passenger vehicles, 12 large trucks) would be expected for the Project. On average, 18 daily trips (16 passenger vehicles, 2 large trucks) would be required.

Construction worker commutes would be 29.4 VMT per worker. This is consistent with typical commute VMTs within the City of Los Angeles and the region. Project construction worker commute trips, which are temporary, would have impacts that are less than significant related to a substantial or sustained increase in VMT.

Truck trips associated with construction would be 13.8 VMT for local deliveries and 40 VMT for specialized equipment deliveries associated with the horizontal directional drilling (HDD). These VMTs are expected to be similar to typical construction-related trips within the City of Los Angeles and the region. Therefore, impacts from construction-related truck trips, which are temporary, would be less than significant related to a substantial or sustained increase in VMT. Once operational, occasional worker trips would be required to inspect and test the power feed and transmission equipment at the power feed equipment (PFE) facility. No routine maintenance would be needed for the terrestrial components of the cable network. Therefore, Project operation would have no impacts related to traffic volumes and VMT.

Any transportation of heavy construction equipment and/or materials that requires use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods.

However, please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standards and specifications.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2019-04308AL-DEIR.

Sincerely,

Frances Duong for

MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse

A1-2
(con't)

A1-3

“Provide a safe and reliable transportation network that serves all people and respects the environment”



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Marine Region
1933 Cliff Drive, Suite 9
Santa Barbara, CA 93109
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



October 23, 2023

Daniel Hortert
Senior Planner
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**RTI-I TRANSPACIFIC FIBER-OPTIC CABLES PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
SCH #2019080175**

Dear Mr. Hortert:

The California Department of Fish and Wildlife (Department) received a Draft Environmental Impact Report (DEIR) from the City of Hermosa Beach (City) for the RTI-I Transpacific Fiber-Optic Cables Project (Project), pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

A2-1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

DEPARTMENT ROLE

The Department is California’s Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish and Game Code, Section 711.7, subd. [a] & 1802; Public Resources Code, Section 21070; CEQA Guidelines Section 15386, subd. [a]). The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., Section 1802). Similarly for purposes of CEQA, the Department is charged by law to provide, as available, biological expertise during public agency environmental review

A2-2

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California and ensuring fisheries are sustainably managed under the Marine Life Management Act. Pursuant to our jurisdiction, the Department has the following comments and recommendations regarding the Project.

A2-2
(con't)

PROJECT DESCRIPTION SUMMARY

Proponent: City of Hermosa Beach

Objective: The objective of the Project is to install and operate up to two transpacific subsea cable systems more than three nautical miles offshore, across the Pacific Ocean, with United States landings in Hermosa Beach, California. The two marine fiber-optic cable systems would connect the United States to the western Pacific Rim to provide additional telecommunications capacity. The proposed Project has two phases that include terrestrial and marine components: Phase 1 includes the construction of the terrestrial facilities shared by both fiber-optic cable systems and installation and operation of one of the systems, and Phase 2 includes the construction of the remaining terrestrial facilities and installation and operation of the second subsea cable system. Project activities involve the terrestrial facility installation which includes underground landing pipes installed by horizontal directional boring that would emerge on the ocean floor approximately 3,000 feet from the landing site, a landing manhole, an ocean ground bed, a power feed equipment (PFE) facility, and buried terrestrial conduit system (i.e., innerducts, fiber-optic, power, ground cables, and intermediate manholes) using trenchless construction (i.e., boring) to connect landing facilities at either 6th Street or 10th Street to the PFE facility. After the land pipes are installed from the shore, the marine fiber-optic cables would be pulled to the shore through the landing pipes. The marine components of the Project include a marine conduit, cable regenerators, and the subsea cables, which would be installed by a cable-laying ship pulling a plow across the sea floor to bury the cables in areas of soft sediment. In the deep ocean, the proposed cable systems would be laid on the sea floor but would not be buried. A 100- to 200-foot construction work boat and a smaller, secondary work boat would support marine activities including the directional bore support, pre-lay grapnel run, cable pulling support, cable laying and plowing, and diver post-lay burial.

Location: The Project's marine cable alignments would traverse the California continental shelf and the Pacific Ocean from Hermosa Beach, California to locations on the western Pacific Rim such as Guam, Southeast Asia, China, Australia, or Japan. The United States landings in Hermosa Beach would be at either 6th Street (Option A) or 10th Street (Option B), and then the cable systems would connect to HMB IX's (Applicant) PFE facility at 1601 Pacific Coast Highway, Hermosa Beach.

Timeframe: The Project would be constructed in two phases to be completed approximately two years apart in 2024 and 2026.

A2-3

BIOLOGICAL SIGNIFICANCE

Marine Biological Significance: The marine ecosystems of California's southern coast, commonly referred to as the Southern California Bight, host thousands of species

A2-4

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of marine plants, fish, invertebrates, seabirds and shorebirds, turtles, and mammals due to nutrient rich waters and varied topography. The southern coast's marine and coastal habitats include the sandy seafloor, beaches, kelp forests, estuaries, seagrass meadows, mudflats, rocky reef, and open waters. This variety of habitats provide fish and wildlife with nursery grounds, shelter, and areas to forage and reproduce, supporting the region's coastal economy, including numerous commercial and recreational fisheries.

A2-4
(con't)

Terrestrial Biological Significance: The terrestrial portion of the Project area lies within the City of Hermosa Beach (City). The area is largely urbanized, with no native vegetation. However, a portion of the terrestrial area is located on a 400-foot-wide sandy beach in the western portion of the City. The beach may provide habitat for federally threatened western snowy plovers (*Charadrius alexandrinus nivosus*) and state and federally endangered California least terns (*Sternula antillarum browni*).

COMMENTS AND RECOMMENDATIONS

The Department offers the comments and recommendations below to assist the City of Hermosa Beach in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife resources.

A2-5

I. Project Level Impacts and Other Considerations

Unburied Cable in Hard Substrate Communities

Comments: It is the Department's understanding that, at water depths less than 5,904 feet, the cable will be buried in soft substrate to a depth of 3.3 feet. The Department appreciates Mitigation Measure MM BIO-06 and BIO-07, which specify that the Project will minimize the crossing of hard-bottom substrate communities and that there will a mitigation fund to compensate for impacts to hard-bottom substrate communities, respectively. However, if hard substrate cannot be avoided in certain areas, the cable will be left unburied and lay directly on the ocean bottom, conforming to the seafloor. As is stated in the DEIR, placement of the cable directly on the substrate could impact the habitat and its associated biological communities. The impact could worsen if the cable becomes suspended and moves around in these areas, leading to repeated scour of the substrate and any attached organisms. While the cable may be placed to minimize suspension, suspension could still occur due to currents or wave action, especially given the cable's relatively small diameter (less than 2 inches).

Recommendations: To minimize potential impacts to hard substrate communities that cannot be avoided by the Project, the Department has the following recommendations:

- If hard bottom communities cannot be avoided by the Project, the Department recommends increasing the stability of the cable in these areas to avoid suspension and scour. The Department is aware of multiple methods to accomplish this, such as encasing the cable in a ductile cast iron pipe

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(articulated pipe) or clamping the cable to the seafloor at regular intervals. The ideal method would likely depend on substrate type and relief and could vary along the cable route. The Department recommends consulting with resource and permitting agencies to determine the best method.

- In addition, the Department recommends adding a Mitigation Measure for the inspection and burial of the cables, including an annual monitoring and reporting requirement for any unburied sections of cable in depths less than 5,904 feet within at least state waters. This will allow for early detection and remediation of cable suspension and any associated impacts to the substrate, biological communities, and reduction in potential fishing or other gear interactions surrounding the cable.

A2-5
(con't)

II. Editorial Comments and/or Suggestions

Mitigation Measure BIO-1: Avoidance of Roosting Western Snowy Plovers or California Least Terns

Comments: As currently written, BIO-1 in the DEIR may not fully mitigate for impacts to special status birds. The Department primarily recommends avoidance of impacts to nesting birds for the entirety of nesting season, if feasible. In addition, the nesting season for both the western snowy plover and California least tern is estimated from April through September.

Recommendations: The Department recommends modifying Mitigation Measure BIO-1 to include underlined language and remove language with strikethrough:

“To protect nesting birds that may occur adjacent to the Project boundary, CDFW recommends that no construction activities occur from February through September. If the beach OGB site is selected, and beach construction/installation activities must be completed during the roosting season (September ~~October~~ through March), a qualified biologist approved by the City will contact USFWS and CDFW to determine if the site is within a Special Protection Zone for roosting western snowy plovers. If the beach OGB site is within a Special Protection Zone, construction activities will not be allowed until western snowy plovers are no longer present. If the area is not within a Special Protection Zone, a qualified biologist will survey the beach OGB work area plus a 300-foot buffer for western snowy plovers and California least terns using established protocols. If present, no work will be completed within the 300-foot buffer. without coordination The Lead Agency will notify and consult with the CDFW and USFWS if a roost is detected in the Project area. The buffer may be adjusted by the qualified avian biologist based on existing conditions, planned construction activities, and the behavior of the birds. If western snowy plovers and California least terns are not detected within the 300-foot buffer, work may proceed as long as the qualified biologist is present during all work activities to ensure that western snowy plovers or California least terns are detected should they arrive in the area subsequent to work commencing. The beach OGB site will include fencing/walls that will prevent western snowy plovers or California least terns from entering the work areas. The biologist will conduct daily site visits to ensure that fence/walls are intact

A2-6

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until construction activities are finished at the site and all equipment is removed from the beach. The results of the preconstruction survey will be submitted to the City prior to the establishment of the beach OGB site. All biological monitoring efforts will be documented in monthly compliance reports to the City.”

A2-6
(con't)

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

A2-7

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

A2-8

CONCLUSION

The Department appreciates the opportunity to comment on the NOP to assist the City of San Diego in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination on marine issues should be directed to Leslie Hart, Environmental Scientist at Leslie.Hart@wildlife.ca.gov. Questions or further coordination on terrestrial issues should be directed to Felicia Silva, Environmental Scientist at Felicia.Silva@wildlife.ca.gov.

A2-9

Sincerely,



Craig Shuman, D. Env
Marine Regional Manager

ec: Becky Ota, Program Manager
Department of Fish and Wildlife
Becky.Ota@wildlife.ca.gov

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Eric Wilkins, Senior Environmental Scientist
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REFERENCES

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Email: RTI Infrastructure Transpacific Fiber-Op

From: Gifford Nowland

Date: September 13, 2023 at 03:36:38 PDT

To: Carrie Tai <CTai@hermosabeach.gov>

Subject: Question regarding RTI-I Transpacific Fiber-Optic Cables Project

Hi Carrie -

Re: RTI-I Transpacific Fiber-Optic Cables Project

If the ultimate termination of the cable is the 16th Street PFE facility what is the justification for landing at 6th Street or 10th Street and proceeding to bisect the entire town terrestrially (i.e. boring) to 16th street instead of landing at 16th Street, minimizing the potential impact on the town, its residents, its structures, and the environment?! Wouldn't landing at 16th street be the most cost-effective and least disruptive route?

B1-1

Thank you,

Gifford Nowland - concerned resident

Email: RTI Infrastructure Transpacific Fiber-Op

From: mike flaherty

Date: September 20, 2023 at 14:09:44 PDT

To: Carrie Tai <CTai@hermosabeach.gov>

Subject: EIR for Transpacific Fiber-Optic Cables Project RT I-I

Director Tai

Observations and Suggestions

I certainly encourage the City to continue with the installation of the Transpacific fiber-optic cables within the City of Hermosa Beach.

Those projects have been a valuable income source for many years and hopefully for years to come.

1. Although a minor issue , the name of the former Rail Road right of way in Hermosa is Hermosa Valley Greenbelt. The name of the same area in Manhattan Beach is Veterans Parkway. Both were named with Community input and confirmed by their respective City Councils.

2. There are numerous existing utilities on /in the Greenbelt , most had Engineering Designs but at least one has been installed without engineering or plans.

I would like to think that the City has the files of the plans and designs of the utilities that are currently in place on the Greenbelt as the City allows new utilities on the Greenbelt.

The utilities that I am aware of are :

1. Fiber-optic cable from 2nd street/ beach area
2. Fiber-optic cable from 25th street/beach area
3. County Sanitation Sewer System
4. City Sanitation Sewer Systems
5. County Storm Drain systems /minor City storm drain system
6. Injection Wells for salt water intrusion system including 16th Street
7. Reclaimed water system
8. City irrigation systems ,reclaimed water
9. City Potable Water drinking fountains
10. City electrical for irrigation systems/traffic signals at school/banner poles
11. Cable tv systems (these systems are unmarked in south end)

As more fiber optic are installed, I would suggest a mapping system to overlap the existing utility systems.

Some of these utilities are independent of the County such as the reclaimed water .

3. Ironically, the newest cable that came in from the 25th /Beach, utilized the area along curb next the south bound Ardmore. After this year's heavy rains,in that area, the erosion is significant in areas south of 20th . It could be a factor in future installations.

Thank you and your Department for the work you do.

Mike Flaherty
310 6217687

B2-1

B2-2

B2-3

B2-4