September 1, 2022

Tahoe Regional Planning Agency
PO Box 5310,
Stateline, NV 89449
(775)588-4547
trpa@trpa.gov

Re: TRPA Shorezone - Lakezone Application
AT&T Project A020LET
Lake Tahoe Cable Removal
South Lake Tahoe, El Dorado County, CA

To whom it may concern,

On behalf of AT&T California, R3X Group is pleased to submit a Shorezone – Lakezone Application for AT&T Project A020LET (Project). Supplemental information for the Shorezone - Lakezone application is provided in this letter.

PROJECT PURPOSE

AT&T proposes the removal of two discontinued submarine communication cables. Authorization to install the cable in submerged lands between Rubicon Bay and Tallac was granted by AT&T's State Lands Commission lease agreement 1579.9 in 1955. The cable submerged in Emerald Bay was authorized by lease agreement 4417.9 in 1970.

PROJECT DESCRIPTION

AT&T California proposes the removal of two lengths of submarine telecommunications cable in Lake Tahoe and Emerald Bay in California. The longest cable is approximately 6-miles long and runs along the Southwestern shore of Lake Tahoe. The cable stretches from Baldwin Beach past Rubicon Point near Lester Beach. Most of the cable resides in the Emerald Bay and DL Bliss Underwater State Parks. This 6-mile cable comes up on shore a total of 6 times. The second cable rests at the mouth of Emerald Bay and spans approximately 1,000-feet. The shorter cable extends between the shores of Emerald Point and Eagles Point and lies in the Emerald Bay Underwater Park. The Project area for both cables lies within the Lake Tahoe Basin Management Unit of the USDA Forest Service. The cables largely rest on the lake bed, not within the substrate, and measure approximately 3-inches in diameter.

The cable removal is expected to occur in the Fall during the recreational off-season, no earlier

than October. AT&T anticipates using three staging areas: the lake entry point for barge launch, the cut locations where cable comes up on shore, and the mobile barge. The cable will be removed using a 30-feet by 60-feet modular barge suitable for shallow water use. An outboard skiff will be used to maneuver the barge and is comparably sized to a recreational boat. These maritime vessels are delivered by semi-trucks with an estimated length of 70-feet to 10-feet width. Portions of the cable on land will be accessed from the barge from which a technician will approach the cut location on foot. Cable segments on shore are buried 4-6-inches. Sections of the cable may lie beneath large boulders, a mini excavator staged on the barge will be used to temporarily remove them. To remove the cable, it will be exposed at the high water line at 6,229.1-feet with hand tools or a mini excavator that will access the location by ramp from the barge, at which the cable will be severed. The cable will be cut with a reciprocating saw. A container will be used to collect particulates generated from the cable cutting operations. To minimize airborne cable particles, the cable will be kept wet during cutting operations. The cut end of the cable will be tied onto a steel cable and winched onto the barge, then spooled into segments. The portion above the high water line will be covered by a 3M shrink cap and reburied with hand tools. A touchdown monitor will observe the operation underwater and collect cable fragments that fall to the lake bed. A technician on the barge will skim fragments from the surface. Collected cable fragments will then be disposed into a container onboard. A technician will be responsible for monitoring plume events through visual observation and a turbidity meter.

Lake access is tentatively planned to be staged from the Tahoe Keys Marina. The Tahoe Keys Marina is approximately 2-miles East of Baldwin Beach. An invasive species inspection will occur on incoming marine craft prior to entering the lake.

It will be the responsibility of AT&T's contractor to dispose of the reclaimed cable at an approved facility in accordance with local, state, and federal regulations.

CONSTRUCTION SCHEDULE

Project is to be completed between October 2022 and March 2023, outside the recreational season. Project is expected to be completed within 16 days. If the permitting process exceeds the 2023 recreational offseason, the project will be completed within October 2023 and March 2024.

LOCATION OF PROPOSED ACTIVITY

The 6-mile cable proposed for removal is located along the shoreline of Lake Tahoe and comes on land at the following 6 locations.

LAKE TAHOE SHORELINE 6-MILE CABLE		
Location	**Latitude**	**Longitude**
Cut Location 1	38.943700	-120.069339
Cut Location 2	38.955678	-120.078125
Cut Location 3	38.967622	-120.085100
Cut Location 4	38.979236	-120.094002
Cut Location 5	38.993388	-120.094308
Cut Location 6	39.009428	-120.113150

The 1,000-foot cable proposed for removal is located in the mouth of Emerald Bay and comes on land at the following 2 locations.

EMERALD BAY 1000-FEET CABLE		
Location	**Latitude**	**Longitude**
Cut Location A	38.965811	-120.084089
Cut Location B	38.963600	-120.081600

STATE TAX PARCEL IDs

The 6-mile cable proposed for removal is located along the shoreline of Lake Tahoe and comes on land at the following parcels.

LAKE TAHOE SHORELINE 6-MILE CABLE	
Location	**Parcel ID**
Cut Location 1	118-090-069
Cut Location 2	018-060-004
Cut Location 3	017-131-001
Cut Location 4	017-111-001
Cut Location 5	017-071-001
Cut Location 6	016-131-005

The 1,000-foot cable proposed for removal is located in the mouth of Emerald Bay and comes on land at the following parcels.

EMERALD BAY 1000-FEET CABLE	
Location	**Parcel ID**
Cut Location A	017-131-001
Cut Location B	018-060-005

SECTION TOWNSHIP RANGE

The 6-mile cable proposed for removal is located along the shoreline of Lake Tahoe and comes on land at the following Section, Township Range.

LAKE TAHOE SHORELINE 6-MILE CABLE			
Location	**Section**	**Township**	**Range**
Cut Location 1	26	13N	17E
Cut Location 2	23	13N	17E
Cut Location 3	15	13N	17E
Cut Location 4	15	13N	17E
Cut Location 5	10	13N	17E
Cut Location 6	33	14N	17E

The 1,000-foot cable proposed for removal is located in the mouth of Emerald Bay and comes on land at the following Section, Township Range.

EMERALD BAY 1000-FEET CABLE			
Location	**Section**	**Township**	**Range**
Cut Location A	15	13N	17E
Cut Location B	22	13N	17E

WATER RESOURCES

Work will occur within the banks of Lake Tahoe. Fill or dredging of material is not proposed. See enclosed Water Quality Protection Plan in Attachment D of the Permit Drawings. Authorization for the cable removal has been requested from U.S. Army Corps of Engineers, Lahontan Regional Water Board, and California Department of Fish and Wildlife.

BIOLOGICAL RESOURCES

A biological assessment was conducted for the proposed project limits. The report summarizes information collected during biological surveys conducted in March, June, July, and August 2022, compiles information about existing biological resources known to occur in the Project area, makes inferences about biological resources that could occur within the Project area, identifies and discusses potential impacts the Project could have on biological resources, and identifies avoidance measures to reduce the likelihood of such impacts.

An endemic plant species to the shores of Lake Tahoe, the Tahoe Yellow Cress (Rorippa submbellata) is listed as endangered under the California Endangered species Act and is a candidate for protection under the federal Endangered Species Act. A rare plant survey was conducted on July 21, 2022 to assess the nearby populations to determine the location of this species relative to Project disturbance areas.

The Project produces temporary impacts to fish habitat. The Project does not produce permanent impacts attributed to new or expanded structures. The cable rests largely on top of gravel, cobble and sand, removal will not significantly modify the lake bottom habitat, and fish will be able to swim away as the cable is lifted. When the cable is removed, water quality adjacent to the cable will increase in turbidity; however these impacts will be relatively short-lived, and fish can move into clear oxygenated water. There is a potential for whitefish eggs to be disturbed during cable removal; however, the scale of these impacts would not be noticeable to the Lake Tahoe Population as a whole.

A biological survey report and rare plant survey are included in support of the application.

CULTURAL RESOURCES

In February of 2022, AT&T California authorized a cultural resources study required for the proposed removal of two copper cables in Lake Tahoe. This cultural resources investigation was requested in order to fulfill the mandates of the National Historic Preservation Act, the California Environmental Quality Act, and the planning directives of the California State Lands Commission, the Tahoe Regional Planning Agency, and California State Parks. This study was carried out as per the California Office of Historic Preservation’s guidelines for archaeological survey reports, and consists of the results of a review of pertinent literature and documents, a records search by the North Central Information Center, a field survey and assessment of the Project area, as well as recommendations.

An archaeological survey report is included in support of the application.

The following supporting documents are enclosed as part of the Shorezone – Lakezone Application

- Permit Drawings
- Project Map
- Biological Report
- Tahoe Yellow Cress Rare Plant Survey
- Agent Letter of Authorization
- Archaeological Survey Report
- Agencies Consulted

Should you have any questions or would like to discuss the project in further detail, you may reach me at (254) 723-0013, or sammy@r3xgroup.com.

Sincerely,

R3X Group, Inc.



Sammy Rodriguez
Senior Scientist