

State Route 35 Distributed Antenna System Project

Mitigation Monitoring, Compliance, and Reporting Program

San Mateo County, California

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Prepared for:

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Prepared by:

Panorama Environmental, Inc.
One Embarcadero Center, Suite 740
San Francisco, California 94111



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1.1 Summary of Environmental Process

1.1.1 CEQA REVIEW AND REQUIREMENTS

Extenet Systems, LLC (Extenet) proposes to construct the State Route 35 (SR 35) Fiber-Fed Distributed Antenna System Project (project). The project includes installation of fiber optic cable and related node facilities (collectively, “Distributed Antenna System” or “DAS”) along a portion of SR 35 in San Mateo County, California.

The project components would be located primarily within the right-of-way of SR 35 near the Town of Woodside, California. The remainder of the project alignment would be located within an existing Extenet utility easement that roughly parallels SR 35. The project, which would be constructed in four phases over a period of 11 weeks (3 months), would include phased installation of the DAS components.

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by the California Public Utilities Commission (CPUC), pursuant to the California Environmental Quality Act (CEQA) to address the potential impacts of the project on the environment. The Final IS/MND was adopted on October 20, 2011. Several mitigation measures are identified to reduce all of the impacts of the proposed project to less-than-significant levels.

1.1.2 MMCRP REQUIREMENTS

This MMCRP includes the information provided in the Mitigation Monitoring and Reporting Plan (MMRP) included in the project IS/MND, as well as specific protocols to be followed prior to and during construction by the Extenet’s environmental compliance team, the CPUC’s environmental compliance team (collectively the project environmental compliance team), as well as Extenet project staff.

Implementation of the MMCRP requires direct participation and commitment from the project compliance team. The success of the program depends upon the coordination and communication between project management, in-field compliance staff, and construction contractor personnel. This MMCRP was developed to provide guidelines, for mitigation implementation and to standardize procedures for environmental compliance during project construction. The procedures have been developed in coordination with Extenet, the CPUC, and Panorama. The MMCRP defines reporting relationships, roles and responsibilities of the project’s environmental compliance team members, compliance reporting procedures, and communication protocols.

1.2 Authority and Purpose of the Program

The California Public Utilities Code, in numerous places, confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt an MMCRP when it approves a project that is subject to preparation of an IS/MND. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for

mitigation monitoring or reporting. The CPUC considers this MMCRP a working guide to facilitate not only the implementation of mitigation measures by the project developer and its contractors, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

1.3 Program Adoption Process

The mitigation measures proposed in the Final IS/MND were approved by the CPUC on October 20, 2011, (Approval No: 11-10-039).

1.4 Schedule

Construction is scheduled to start in early May, 2012 and is estimated to last 11 weeks from the start of construction. Construction would occur from 7:00am to 6:00pm during weekdays and from 9:00am to 5:00pm on Saturdays. Lane closures are prohibited outside the hours of 9:00am and 4:00pm on weekdays. No construction would occur on Sundays or holidays.

1.5 Project Documentation

1.5.1 CEQA DOCUMENT AND PROJECT PLANS

Several mitigation measures and Applicant Proposed Measures (APM) have been identified in the Final IS/MND. In addition to the APMs and mitigation measures, construction activities must be conducted in accordance with the requirements stipulated in the following plans:

- Spill Prevention and Contingency Plan (SPCP)
- Health and Safety Plan
- Erosion Control Plan

1.5.2 PERMITS

Several local and state agencies have jurisdiction over lands and/or resources that are crossed by the project route. The CPUC, as the lead agency, is responsible for ensuring that mitigation measures reviewed and approved by jurisdictional agencies during the Draft IS/MND process are implemented throughout construction. However, staff from other agencies may periodically visit the project site and request information regarding the status of mitigation implementation. Prior to project implementation Extenet is responsible for submitting a geotechnical report to Caltrans for review and approval. Extenet is responsible for satisfying requests from jurisdictional agencies, and will notify and copy the CPUC on all correspondences related to final approvals and permits for the project if the CPUC is not otherwise copied on the correspondence. Additional information on communication protocols is presented in Section 2.4 of this MMCRP. Table 1.5-1 lists jurisdictional agencies, purpose of consultation, and required permits associated with the project.

Table 1.5-1: Permits and Approvals That May Be Required

Permit/Approval	Agency	Jurisdiction/Purpose
<i>State Agencies</i>		
Permit to Construct (PTC)	California Public Utilities Commission (CPUC)	Overall project approval and California Environmental Quality Act

Table 1.5-1: Permits and Approvals That May Be Required

Permit/Approval	Agency	Jurisdiction/Purpose
		(CEQA) review
Encroachment Permit	Caltrans District 4	Approval for construction within Caltrans right-of-way
<i>Local Agencies</i>		
Electrical Permit	San Mateo County Planning and Building Department	Local approval for use of the electricity grid

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Roles and Responsibilities

This section describes the roles and responsibilities of key project personnel with respect to the MMCRP. Figure 2.1-1 provides an organizational chart of project members responsible for implementing the MMCRP and their relationship to other staff working on the project. The organization chart also establishes preliminary lines of communication between the project team members.

2.1 Organization Overview

2.1.1 EXTENET'S PROJECT MANGER/CONSTRUCTION MANAGER

The Extenet Project Manager provides the overall direction, management, leadership, and coordination for the construction project. The Extenet Project Manager's responsibilities for implementation of the environmental program include, but are not limited to:

- Coordinating between engineering, construction management, and environmental staff
- Providing leadership by integrating environmental responsibilities into all levels of the project organization
- Ensuring compliance with project policies, guidelines, and procedures
- Communicating project activities, schedules, and public relation issues to the project team
- Ensuring compliance with permit conditions, construction contracts including specifications, and applicable codes
- Notifying the Environmental Inspectors (EI) of project and schedule changes
- Working with EI to evaluate and improve the implementation of the MMCRP, as construction progresses
- Regularly facilitating project field meetings

2.1.2 EXTENET'S ENVIRONMENTAL INSPECTORS

Extenet's EI will work closely with construction personnel to ensure pre-construction and pre-work surveys are completed and mitigation measures are correctly implemented. The EI will be the primary field staff responsible for evaluating, documenting, and verifying that construction activities comply with all applicable mitigation requirements and federal, state and local permit requirements. The EI will also work closely with the CPUC Environmental Monitor (EM) to determine the effectiveness of mitigation measures and whether adjustments are needed to provide adequate protection of sensitive resources. Extenet will have specialty EIs on-site as needed. .

2.1.3 CPUC PROJECT MANAGER

The CPUC Project Manager will determine the effectiveness of the MMCRP based on the success criteria included in the mitigation monitoring table. The CPUC will delegate monitoring and reporting responsibilities to third-party monitors during construction, and will oversee their work through review of bi-weekly status reports. The CPUC Project Manager will be notified of

noncompliance situations and may suggest measures to help resolve any issues that arise. All variance requests will be submitted to the CPUC Project Manager for review and approval.

2.1.4 CPUC ENVIRONMENTAL MONITOR AND MONITORING MANAGER

The CPUC will delegate daily monitoring and reporting responsibilities to Panorama. The CPUC EM will report directly to the CPUC Monitoring Manager who will oversee the day-to-day monitoring activities of the EM, as well as determine the appropriate level of inspection frequency. The CPUC EM will be an integral part of the project team, and will stay apprised of construction activities, schedule changes, and construction progress. The CPUC EM will document compliance through site inspections, bi-weekly reports sent to the CPUC, and use of a mitigation measure tracking table. The CPUC Monitoring Manager will coordinate with the CPUC Project Manager, oversee variance requests, etc.

2.1.5 EXTENET CONSTRUCTION PERSONNEL

The Extenet construction staff and contractor staff have significant responsibilities for compliance with the environmental requirements of the project. The Construction Manager(s) and contractor(s) will be responsible for incorporating all project environmental requirements into their day-to-day construction activities. Key environmental responsibilities for the Construction Manager(s) and Contractor(s) staff include, but are not limited to:

- Verifying that all construction workers attend the project's environmental training program prior to beginning work
- Reviewing and understand the environmental requirements
- Implementing environmental protection requirements and conditions during construction
- Maintaining compliance with project requirements
- Responding to EI's requests during construction

2.1.6 MITIGATION MONITORING PROGRAM CONTACT LIST

A project contact list is included as Appendix B. The contact list includes the Extenet and CPUC monitors, project managers, supervisory staff, and other members of the project team. The list also includes phone numbers, fax numbers, and e-mail addresses where project members can be reached during construction. The contact list will be updated periodically and redistributed to the project team.

2.2 Responsibilities

2.2.1 MONITORING

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and APMs are implemented. The CPUC is responsible for ensuring full compliance with the provisions of this monitoring program and has primary responsibility for implementation of the monitoring program. The CPUC has delegated monitoring responsibilities to a third-party, Panorama, who will provide the CPUC EM. The EM will be in the field on a regular basis, particularly when construction activities have the potential to impact a sensitive resource.

Extenet will elect to have one or more full-time EIs (including specialized monitors) on-site on a daily basis to assist construction crews with interpreting mitigation measures and correcting compliance issues in a timely manner. EIs would also provide environmental training, as required, as new workers arrive on the project.

Several mitigation measures require Extenet to supply a general monitor or a monitor with a resource specialization, as identified in Table 2.2-1.

2.2.1 ENFORCEMENT

The CPUC is responsible for enforcing monitoring procedures through the CPUC EM. The EM notes problems with monitoring, notify designated project members, and report the problems to the CPUC Monitoring Manager and CPUC Project Manager. The CPUC has the authority to inform Extenet's Construction Manager or designated lead to stop or redirect any construction activity associated with the State Route 35 Distributed Antenna System Project, when it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted.

Mitigation Measure/ Applicant Proposed Measure Number	Resource	Monitor	Project Area
Air Quality-1	Air Quality: Dust Control Measure	General	Entire project area
APM Biology-1	Nesting Birds and Special Status Species	Biologist	Entire project alignment and buffer area
Biology-1	Special Status Plants	Botanist	Entire project area
Biology-2	Special Status Animal Species	Biologist	Within 50 feet of daily construction activities
Biology-4	Nesting Birds and Special Status Species	Biologist	Within 500 feet of entire project area
APM Cultural Resources -1	Historic or Archaeological	Archaeologist	Location of discovered resource(s)
APM Cultural Resources-2	Fossil or Paleontological	Paleontologist	Location of discovered resource(s)

The Construction Manager or designated lead will direct the crew to stop the construction activity in a safe and secure manner. The CPUC has assigned this authority to the CPUC EM in the field. The CPUC EM will follow communication protocols that are more fully described in Section 2.3.3.

2.2.2 MITIGATION COMPLIANCE

Extenet is responsible for successfully implementing all of the adopted mitigation measures in the MMCRP. The MMCRP contains criteria that define whether mitigation is successful. Standards for successful mitigation are also implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact.

Extenet shall inform the CPUC and its monitors, in writing, of any mitigation measures that are not or cannot be successfully implemented. The CPUC, in coordination with its monitors, will assess whether alternative mitigation is appropriate and the procedure for changing mitigation, and determine with Extenet the subsequent actions required. If the measures are agency permit requirements, then Extenet will coordinate with the permitting agency to determine the appropriate action.

2.3 Communication

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible shut-downs, environmental and construction representatives must interact regularly and maintain professional, responsive communications at all times. Similarly, Extenet representatives must coordinate closely with the CPUC EM to address and resolve issues in a timely manner. Appendix C includes a communication protocol summary for use as quick reference, and to supplement information provided in Section 2.4.

2.3.1 PRE-CONSTRUCTION KICK OFF MEETING

A pre-construction meeting was held on March 21, 2012 with the CPUC and Extenet team to review the MMCRP and to mutually agree upon the project's communication protocol. Based on discussion at the meeting and input from each party, Section 2 of this document was finalized and incorporated into the MMCRP.

2.3.2 WORKER ENVIRONMENTAL TRAINING PROGRAM

Extenet will facilitate a worker environmental training program (WEAP) prior to construction. This program will target construction management and staff. The program will address specific resource issues and compliance requirements. Workers will be required to attend the environmental training program prior to starting work on the project. Workers who cannot attend the training may watch a video recording of the training program.

Extenet is responsible for maintaining a log of workers who have been trained, including date, name and signature of completion. The log sheets must be provided to the CPUC and its monitors.

2.3.3 MEETINGS

Extenet may request the CPUC EM to participate in regular in-field progress meetings to help resolve any issues or concerns. Alternatively, Extenet or the CPUC EM may recommend a separate meeting to discuss mitigation, variance requests, or other project related issues.

In addition to the progress meetings conducted at the field level, the Extenet Project Manager, EI and the CPUC Project Manager, Monitoring Manager, and EM may participate in a regular teleconference call to discuss project status.

2.3.4 DAILY AND WEEKLY COMMUNICATION

Many of the issues that come up during construction can be resolved in the field through regular communication between the CPUC EM, EI, and construction supervisors. Field staff will be equipped with cell phones and available to receive phone calls at all times during construction. A project contact list is included in Appendix B. The organization chart (Figure 2.1-1) shows the lines of communication for use during construction. Additional guidelines to ensure effective communication in the field are summarized below.

CPUC EM

The CPUC EM's primary point of contact in the field will be Extenet's EI. The CPUC EM will contact the EI if an activity is observed that conflicts with one or more of the APMs, mitigation measures, or permit conditions in order to correct the situation. If the CPUC EM cannot immediately reach the EI, then the Extenet Project Manager will be contacted to address the problem. Similarly, the EM will contact the EI for construction locations, the status of mitigation implementation, and schedule forecasts. The EM may discuss construction procedures directly with the construction personnel; however, Extenet may require that their contractors defer questions to an on-site Extenet representative. In all cases, the EM will contact the designated Extenet representative if a problem is noted that requires action from the contractor.

The CPUC EM will not direct the contractor; however, the EM has the authority to inform the Extenet Construction Manager or designated lead to stop or redirect an on-going activity, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area). If an activity could have an immediate threat to a sensitive resource and doesn't allow time to contact the Extenet Construction Manager or designated lead to avoid impacts, and assuming it is safe to do so, the EM will have authority to temporarily halt activities. The CPUC EM's authority to halt an activity only applies to the direct activity that would cause the potential threat and only for a period of time long enough to contact the Extenet Construction Manager or designated lead for further direction or to avoid the threatened resource.

Extenet

Extenet will provide the CPUC monitoring team with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title and responsibility, and will be updated as new project personnel are assigned to the project and redistributed as necessary.

Extenet will prepare and distribute a weekly environmental compliance status report for distribution to key project members, including the CPUC.

Any questions regarding the status of mitigation measures will be directed to the Extenet EI or Project Manager. A weekly environmental compliance status report will also be a tool to keep all parties informed of construction progress and schedule changes.

2.3.5 COMMUNICATION COMPLIANCE ISSUES

Section 3.1.5 describes procedures to communicate incidents, and non-compliances identified by the CPUC EM during site inspections.

2.3.6 COORDINATION WITH OTHER AGENCIES

As discussed in Section 1.5.2, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. Extenet is responsible for contacting resource agencies and notifying them of issues within those agencies' jurisdiction. However, if there is an unresolved issue regarding compliance with a mitigation measure or permit requirement under the jurisdiction of a resource agency, the CPUC compliance team may elect to contact the agency with Extenet to discuss a resolution, but only after having given Extenet sufficient time to address the issue themselves. The CPUC compliance team will coordinate with Extenet prior to making this call and provide Extenet with an opportunity to participate in the call.

2.3.7 DISPUTE RESOLUTION

Disputes may develop between Extenet and CPUC when conflicting opinions of project processes and procedures are made. It is expected that the MMCRP will reduce or eliminate many potential disputes; however, even with the best preparation, disputes may occur.

Issues should be first addressed informally at the field level between the EM and EI. Questions may be raised to the Extenet Project Manager. Should the issue persist or not be resolved at these levels, the following procedures will be used.

- Step 1 Disputes unresolved in the field and complaints (including those of the public) should be directed to the CPUC Project Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute informally. Should this informal process fail, the CPUC Project Manager will inform Extenet prior to initiating Step 2.
- Step 2 Should the informal process in the field fail, the CPUC Project Manager may issue a formal letter requiring corrective actions to address the unresolved or persistent deviations from the project or adopted MMCRP.
- Step 3 If a dispute regarding mitigation implementation cannot be resolved informally or through a letter request, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants to resolve the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- Step 4 If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Parties may also seek review by the Commission through existing procedures specified in the CPUC Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

Environmental Compliance and Field Procedures

3.1 Mitigation Measures Compliance and Reporting

3.1.1 PRE-CONSTRUCTION COMPLIANCE VERIFICATION

In addition to performing various surveys and studies prior to construction, Extenet is required, by the terms of the mitigation measures and the permitting requirements of various other regulating agencies, to prepare and obtain approval for several construction plans. Copies of plan approval will be retained by Panorama, and provided to the CPUC with all files at the completion of the project. The required plans, surveys, studies, and other documentation that must be completed by Extenet before construction are described in the APMs and mitigation measures in Appendix E.

Panorama, including Project Management staff and the technical experts, will review all mitigation plans and reports and provide comments where applicable. Resource agencies will also be involved in the review of applicable plans and reports. Comments will be provided to Extenet for any plans that require CPUC review and approval. Based on Extenet's construction plans, CPUC may authorize construction to begin on a phased basis, and Panorama will complete pre-construction compliance review accordingly.

3.1.2 NOTICE TO PROCEED PROCEDURE

Compliance with all pre-construction mitigation measures and APMs will be verified prior to construction, and construction may not start on any segment before Extenet receives a written Notice to Proceed (NTP) from the CPUC Project Manager. The CPUC may issue NTPs for construction of each phase separately as pre-construction compliance is satisfactorily accomplished for that phase.

IMPORTANT: The CPUC will not authorize construction to begin until all relevant pre-construction requirements are fulfilled as appropriate for a given phase. To save time, Extenet should identify any extra work space needs required for each phase of construction prior to the start of active construction, so that these locations and their use can be included in the NTP. Refer to Section 3.2.2.

The CPUC Project Manager and all IS/MND team reviewers will ensure that the NTP approvals consistent with the adopted CEQA document. The NTP approval(s) shall document that relevant pre-construction mitigation measure requirements, including applicable surveys and studies, and project permit requirements have been met. More than one NTP can be requested for the Project. Each NTP request would be applicable to a defined aspect or segment of construction. Construction is defined as any mobilization activity that would move construction-related equipment and/or materials onto a site. In some instances, compliance with every requirement cannot be met prior to NTP issuance and the NTP may be conditioned to define actions that will be undertaken and documented prior to construction or prior to energizing the line.

An NTP may be issued for a particular segment or project component upon compliance with applicable mitigation measures and permits, and this process could occur in advance of mitigation compliance for the entire project.

An NTP request must include the following information:

- A description of the work
- Detailed description of the segment location, including maps, photos, and/or other supporting documents
- Verification that all relevant preconstruction mitigation measures and APMs are implemented, or that they do not apply to the work covered by the NTP request
- Verification that all applicable permit conditions or requirements have been met for the work covered by the NTP request
- In the case where some outstanding preconstruction compliance items cannot be met prior to issuance of the NTP, a request shall be submitted that identifies the outstanding submittals, as well as how they will be met and approved in a timely manner prior to construction
- Up-to-date biological resource surveys or a commitment to survey and submission of results prior to construction
- All applicable jurisdictional permits or agency approvals (if necessary)
- Date of expected construction and duration of work

The CPUC and Panorama will review the NTP request and pre-construction requirement submittals, in accordance with the steps outlined below, to ensure that all of the information required to process the approval is included.

1. Extenet submits NTP request
2. CPUC/Panorama will distribute the NTP request to the appropriate resource specialists and reviewers to determine the completeness of the request, as applicable
3. CPUC/Panorama will also review and, if needed, will prepare a list of outstanding requirements, identifying where additional information or clarification is needed
4. All questions and comments, as well as required additional information or clarifications, will be sent to Extenet by CPUC/Panorama in an e-mail
5. Extenet will supply clarifications and/or additional information to be added to the NTP request in a memo, email, or letter format, along with responses addressing all comments and questions forwarded by CPUC/Panorama
6. CPUC/Panorama will complete a Compliance Status Table documenting compliance and any outstanding requirements that can be made conditions of the NTP. If comments or conditions are provided by, permitting agencies, they will be considered for incorporation into the NTP approval letter and compliance table
7. Panorama will prepare the draft NTP approval letter, which will document the scope of work, compliance with IS/MND mitigation requirements, and list outstanding conditions
8. CPUC will review the draft NTP approval letter, and send the approval and an updated compliance table to Extenet

Please note that variance requests can be submitted with the NTP request for incorporation into the NTP (please see Section 3.3.1 for variance submittal requirements).

3.1.3 COMPLIANCE VERIFICATION

The CPUC EM will conduct routine site visits to determine compliance with the mitigation measures. Site visits will be coordinated with Extenet; at a minimum, the EM will verify with the EI that access can be safely granted. Supplemental information provided by Extenet, including pre-construction submittals, survey reports, weekly reports, meeting notes, and agency correspondences, will also be used to verify compliance.

3.1.4 COMPLIANCE REPORTING

The CPUC EM will document observations along the ROW through the use of field notes and digital photography. Field inspection forms will be utilized to document compliance of construction crews, activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms, field notes, and Extenet's weekly report will be used to generate bi-weekly compliance reports, as well as update the status of mitigation measures listed in Appendix E.

3.1.5 COMPLIANCE LEVELS

During project activities, observations of issues and concerns will be documented in Extenet's weekly compliance report and in Panorama's bi-weekly compliance report. Three compliance level terms will be used by the CPUC to describe observations of problems, potential problems, or unaddressed concerns with project requirements. Compliance level terms are listed below in order of severity with a description of potential examples and required actions by the reporting party (Extenet EI or CPUC EM):

- 1) **Occurrence.** Observations or events that do not rise to the level of a noncompliance event, but that if left uncorrected or repeated could result in an incident or noncompliance.
 - **Potential Examples:** minor loose trash, minor oil spill, a minor mistake that did not result in reduction of a mitigation measure's effectiveness (i.e. incorrectly installed erosion controls that are repaired before erosion or a rain event has occurred). Safety measure mistakes maybe elevated in compliance level immediately.
 - **Required Actions:** EM or EI notifies alternate party of issue → A follow up time is determined, if needed →EI addresses the issue and follows up with EM until the issue is resolved.
- 2) **Incident.** Issues involving an activity or observed resource protection measure that only slightly deviate from project requirements and do not put a resource at risk. Repeated occurrences involving the same issue may be documented as an incident. Repeated incidences involving the same issue may result in noncompliance.
 - **Potential Examples:** Failure to properly maintain an erosion or sediment control, use of an existing unapproved access road, project personnel begin work on the ROW without proof of training, or project personnel work outside the approved work limits within a previously disturbed area.

- **Required Actions:** EM or EI notifies alternate party of issue → Reporting party notifies project compliance team of incident in writing by the end of the following business day (project compliance team includes: CPUC Project Manager, CPUC Monitoring Manager, CPUC EM, Extenet Project Manager, and Extenet EI [Criteria for Notification of Incident in Appendix D or email equivalent with same information]) → Extenet EI or Project Manager provides follow up actions taken → EM and EI follow up with issue until resolved
- 3) **Noncompliance.** An observation or event that deviates from permit conditions or mitigation measures and puts a resource at un-permitted risk. A noncompliance level reporting term may also result from repeated incidents involving the same issue, or if a mitigation measure is not implemented according to specified requirements.
- **Potential Examples:** Use of an unapproved and previously undisturbed or resource sensitive area, encroachment into an exclusion zone or sensitive resource area designated for avoidance, use of an unapproved staging area or extra workspace, brush clearing outside the approved work limits, work without biological pre-construction surveys or a biological monitor on site where and when required, or lack of implementation of a project requirement or mitigation measure.
 - **Required Actions:** CPUC Project Manager or CPUC Monitoring Manager notifies project compliance team in writing of the noncompliance issue (project compliance team includes: CPUC Project Manager, CPUC Monitoring Manager, CPUC EM, Extenet Project Manager, and Extenet EIs) → Extenet’s compliance team provides follow up action details → Project compliance teams follow up with issue until resolved (see below for further information)

The Extenet EI and CPUC EM will immediately inform the Extenet Construction Manager or designated lead to halt construction activities and implement any emergency action to stop the noncompliance once it is safe to do so. The CPUC Project Manager and Extenet Project Manager will be immediately notified of a noncompliance that requires immediate corrective action. A noncompliance memorandum will be sent to Extenet by the CPUC Project Manager by the close of the following business day that outlines the issue, lists actions required to bring the activity back into compliance, and provides a timeline for follow-up.

Details of all three compliance level issues, including potential delayed impacts, and follow up actions will be included in Extenet’s weekly and Panorama’s bi-weekly compliance reports. Copies of any incident or noncompliance level notifications will also be included in these reports.

3.2 Project Changes

At various times throughout the project, the need for extra workspace or additional access roads may be identified outside of the permitted project area. Similarly, changes to the project requirements (e.g., mitigation measures, specifications, etc.) may be needed to facilitate construction or provide more effective protection of resources. The project team should work together to find solutions when variations or adjustments are necessary for specific field situations.

3.2.1 VARIANCE PROCEDURE

The CPUC Project Manager along with the CPUC monitoring team will ensure that any variance process or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements. A variance will not be approved by the CPUC if it will create new significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements unless the appropriate agency has approved the change, that does not increase the severity of an impact or create a new impact without appropriate agency approval, and that complies with the intent of the mitigation measure.

A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, APMs, or correction of such deviation, will be reported immediately to the CPUC monitoring team for their review. The CPUC monitoring team will review the variance request to ensure that all of the information required to process the variance is included and then forward the request to the CPUC Project Manager for review and approval. The CPUC Project Manager may request a site visit or additional information from the CPUC EM in order to process the variance. In some cases, a variance may also require approval by jurisdictional agencies. A checklist of information required for a variance is included in Appendix D.

To request a project variance, the checklist located in Appendix D needs to be completed and sent to the CPUC Project Manager and monitoring team for review.

3.2.2 TEMPORARY EXTRA WORK SPACE PROCEDURES

For the purposes of this MMCRP, Temporary Extra Work Space (TEWS) is defined as a work space that will be utilized by Extenet during construction for a period of up to 60 days, and that was not identified and evaluated during the CEQA process. Any areas that would be utilized for longer than 60 days will require a variance. Extenet must demonstrate the following requirements:

- The TEWS is located in a disturbed area with no sensitive resources, or on site or adjacent land uses that could be disrupted
- Extenet has permission of the applicable landowner (e.g., municipality or private) to use the work space

Use of the TEWS would not result in any significant environmental impacts. In the event that Extenet determines a need for a construction TEWS, a request must be submitted to the CPUC Monitoring Manager. The CPUC Monitoring Manager will have the authority to approve or deny use of a TEWS, assuming it meets the criteria defined in the previous paragraph. Extenet will not be permitted to use a TEWS prior to receiving written authorization from the CPUC Monitoring Manager. A checklist of information required for a temporary extra workspace approval is included in Appendix D.

To request a TEWS, the checklist located in Appendix D needs to be completed and sent to the CPUC Monitoring Manager and EM for review.

Standard Conditions of Approval

- Use of TEWS is limited to 60 days.

- Use of TEWS shall be in compliance with local ordinances (including traffic/noise) and mitigation measures.
- If any signs of cultural resources are identified, work shall cease immediately and the site shall be reevaluated.
- The proposed site shall not be used for storage of fuel or hazardous materials.
- All drips, leaks, and/or spills from vehicles and/or equipment shall be cleaned-up immediately and disposed of in appropriately labeled containers.
- Adjacent streets shall be swept or cleaned with water at the end of each workday if visible soil material is carried on them.
- No parking or storage of vehicles (including personnel vehicles), equipment, pipe, or any other project related item shall be allowed on adjacent roadways.
- If a complaint is received, it shall be forwarded to the Extenet Manager, the CPUC EM, and the CPUC Monitoring Manager for review and to be addressed by Extenet

3.2.3 MINOR FIELD CHANGES

A minor field change is a change in the project construction methods that is minor in scope and that would not result in new or potentially significant to the environment, the determination of which is readily discernible by the CPUC EM in the field. The CPUC Monitoring Manger or EM may determine that impacts associated with a proposed change are minor in scope and would not result in new or potentially significant impacts, and for this reason do not require a request or approval for variance from the project as it was approved in the IS/MND. If Extenet requests a minor field change, a list of required information will need to be provided to the CPUC Monitoring Manger and EM, which are included in Appendix D. Should the Monitoring Manager and EM determine such a change is minor and does not warrant a variance request, he or she will approve the activity and document the decision in an email sent to the project compliance team.

Examples of a potential informal minor change include:

- Use of a vehicle turnaround, pull out, or passing space in a previously disturbed area
- Minor extra road widths that do not require grading or clearing
- Use of a minor existing road segment in a previously approved work area
- Adding or shifting a minor workspace to avoid an environmental resource
- Shifting a pull and tension site boundary that would not result in new or additional impacts.

All areas must be have been surveyed and not have any biological and cultural resource issues.

The CPUC EM can provide a verbal approval to the EI in the field but will provide documentation of a minor change approval in an email to the project compliance team after the listed approval criteria has been received. Potential denial of a request may or may not be documented based on discussions in the field. If approval of a minor change is denied through this process, a variance or TEWS form may be submitted to request the change. Approvals will not be processed without receipt of the completed project change criteria checklist (Appendix D).

Note that all IS/MND project requirements, as well as permit conditions and mitigation measures apply to the minor field change action, unless otherwise approved and specified.

3.3 Records Management

Any daily inspection and weekly status reports will be filed and used by Panorama to prepare a brief, final environmental compliance report following the completion of construction. The final report will provide a discussion on how each mitigation measure was implemented and will include copies of submittals required for compliance. In addition, the success criteria will be evaluated and used for future projects.

3.4 Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available by the CPUC for public inspection upon request.

Mitigation Monitoring Program Table

4.1 Using the Table

The table in Appendix E lists the mitigation measures included in the Final IS/MND. The table is the core document for determining compliance with the MMCRP. A copy of the table should be kept with each crew working on the ROW, and all supervisory staff working on the project should be familiar with its contents.

The CPUC will use a modified version of the mitigation measure tables during the pre-construction planning and construction monitoring phases of the project to accurately track the status of mitigation measures. Tables will be sorted and divided into pre-construction measures and measures to be implemented during construction. A separate table listing mitigation measures that require CPUC approval may be generated. The modified tables will also include a status column that will be updated on a regular basis.

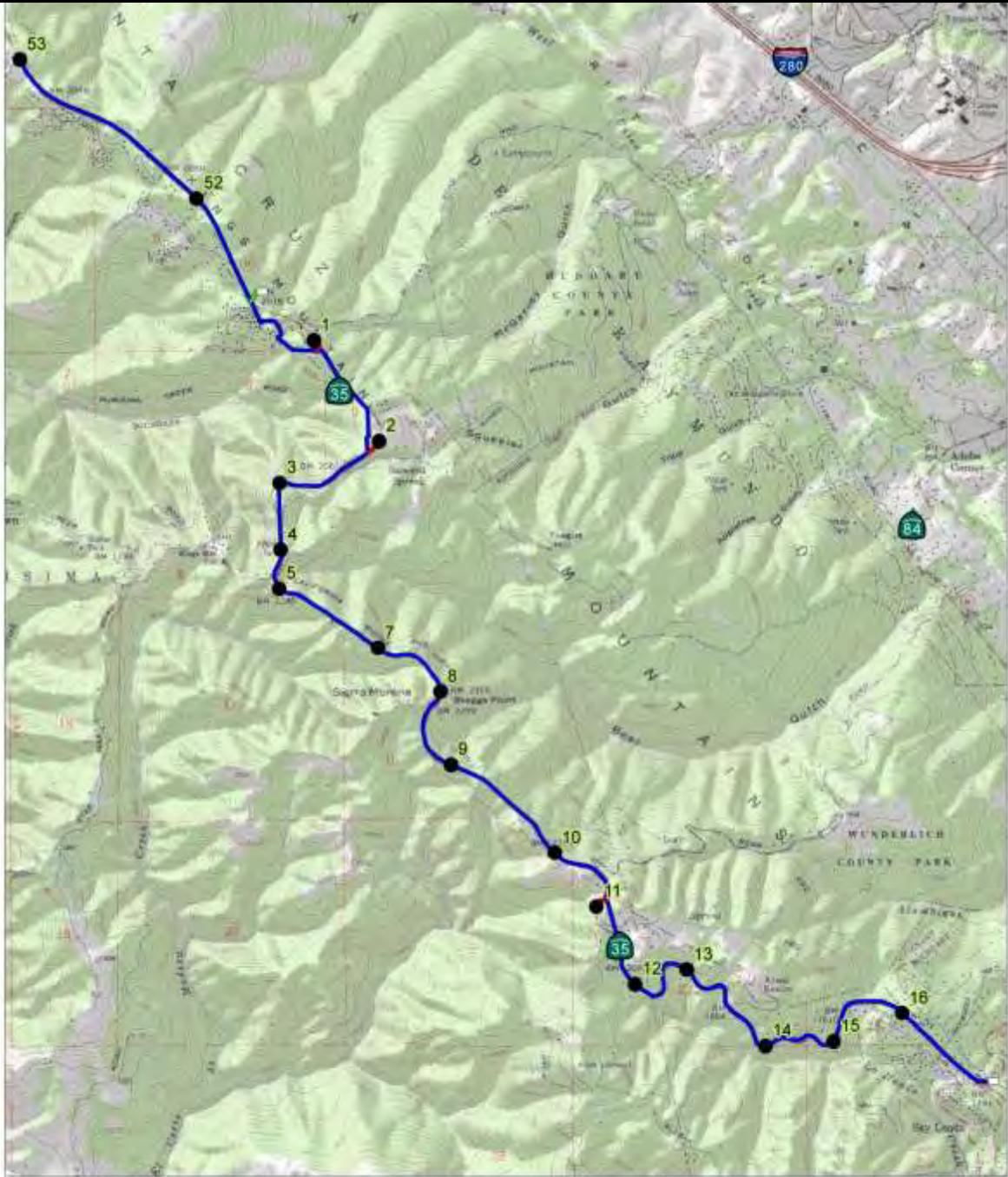
4.2 Effectiveness Review

The CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts, at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 2.4.6. If the Commission determines that any conditions are not adequately mitigating environmental impacts caused by the project, then the Commission may, in coordination with Extenet, develop alternative measures to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the Commission's rules and practices.

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Appendix A: Project Layout Map

Figure A-1: Project Layout Map



SOURCE: ESRI 2011

Scale: 1:43,000

LEGEND



- Proposed Project Route (Existing Underground)
- Proposed Project Route (Proposed Aerial)
- Proposed Project Route (Proposed Underground)

- Node
- Cell Site Base



Appendix B: Project Contact List

Table B-1: Project Contact List				
Name	Agency/ Company	Job Title/Duties	Phone Number/Fax Number	Email Address
Andrew Barnsdale	CPUC	CPUC Project Manager	(415) 703-2068	andrew.barnsdale@cpuc.ca.gov
Patti Ringo	Extenet	Project Manager	(805) 404-4202	paringo@extenetsystems.com
Patti Ringo	Extenet	Construction Manager	(805) 404-4202	paringo@extenetsystems.com
Cord Hute	Extenet	Environmental Inspector (EI)	(415) 328-7923	cord@synthesisplanning.com
Cord Hute		Specialty Monitor	(415) 328-7923	cord@synthesisplanning.com
Jeff Smith	Panorama	CPUC Monitoring Manager	(650) 373-1200	jeff.smith@panoramaenv.com
Aaron Lui, Corey Fong	Panorama	CPUC Environmental Monitors	(650) 373-1200	aaron.lui@panoramaenv.com corey.fong@panoramaenv.com

Appendix C: Communication Protocol Summary

Communication Protocol Summary

Section 2.4 of the MMCRP includes a communication protocol to ensure that the CPUC EM has access to project information, including schedules, mitigation measure implementation status, and survey results. The communication protocol establishes a chain of command that will be used to report environmental issues observed during EM site inspections. The following table summarizes the communication protocol.

For additional information, refer to Sections 2 and 3 of the MMCRP.

Table C-1: Communication Protocol				
Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
<i>Meetings</i>				
Regular Construction Meetings	Extenet Construction Manager and EI	CPUC EM	TBD	Regular construction meetings are held in the field to discuss construction progress and construction and environmental issues. Refer to Section 2.4.2 of the MMCRP.
Bi-Weekly Teleconference Calls	CPUC Monitoring Manager	CPUC Project Manager	CPUC Monitoring Manager CPUC EM Extenet Project Manager Extenet EI	Bi-weekly teleconference calls are held to discuss status of mitigation measures, construction schedule, issues noted during site visits, and project changes.
Field Meetings	Extenet or CPUC EM	TBD	TBD	Field meetings may be requested by any party to discuss variance requests, non-compliances, or other site-specific issues.
<i>Project Changes</i>				
Scheduling	Extenet Project Manager	CPUC Monitoring Manager	CPUC EM	Changes in project schedule that could affect the status of mitigation measures will be communicated to the CPUC Monitoring Manager by email. If the project change will have an immediate impact, the CPUC EM or CPUC Monitoring Manager will be contacted by phone.

Table C-1 (Continued): Communication Protocol				
Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
Variance Requests	Extenet Project Manager or designated environmental lead	CPUC Monitoring Manager	CPUC Monitoring Manager	All variance requests will be submitted to the CPUC Monitoring Manager and CPUC Project Manager through the variance request form and supporting documentation. The CPUC Monitoring Manager will review the information in the variance request for completeness. The CPUC Project Manager will distribute a variance request approval or denial after review is complete. Refer to Section 3.3.1 of the MMCRP.
Compliance Issues				
Minor Incidences and Non-compliance	CPUC EM or CPUC Monitoring Manager	Extenet Project Manager or designated environmental lead	Extenet TBD	Minor incidences and non-compliances noted during site inspections will be documented by the CPUC EM and sent to Extenet for corrective action. Notification of a minor incident or non-compliance will occur no later than the following day. If Extenet corrects the issue before the report is issued, it will be noted in the report. Refer to Section 3.2.5 of the MMCRP.
General Concerns	CPUC EM	Extenet EI	Extenet (TBD)	The CPUC EM will contact Extenet EIs to discuss general issues and questions that arise during site visits. The CPUC EM may communicate with crew members on the ROW, but will not direct their work or rely on them for information regarding the project.
Agency Jurisdiction Concerns	Extenet Project Manager	Applicable Agency	CPUC Monitoring Manager	The resource agencies will be notified by Extenet of any issues that fall within their jurisdiction. The CPUC Monitoring Manager

Table C-1 (Continued): Communication Protocol

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
				<p>will also receive immediate notification of jurisdiction concerns.</p> <p>Communication between Extenet and the resource agencies will be documented and documentation will be submitted to the CPUC Monitoring Manager.</p> <p>In addition, if the CPUC Monitoring Manager has an unresolved concern regarding compliance with agency requirements, with a call with Extenet and the resource agency will be requested.</p>
Dispute Resolution	All	CPUC Monitoring Manager	CPUC Project Manager	In the event that a dispute cannot be resolved in the field, the CPUC Project Manager may issue a formal letter. Refer to Section 2.4.6 of the MMCRP.

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Appendix D: Criteria for a Notification of Incident

Criteria for a Notification of Incident

State Route 35 Distributed Antenna System Project

Note: Either complete this form or provide the information in an email documenting the incident.

Date of Incident: _____

Personnel/Contractor/Monitor/Other Personnel Present: _____

Location: _____

Specify Requirement (e.g., Mitigation Measure Biology-5): _____

Detailed Description of Incident: Photos? Yes No

Resolution: Include names and phone numbers and times of conversations – Remember to follow the Communication Protocol at all times.

Prepared by: _____ **Date Prepared:** _____

*Provide compliance team with incident form by the following work day. Include copies in reporting period compliance reports.

Criteria for Variance Request, TEWS, or Minor Field Change

Instructions

Provide the following information to the CPUC EM or CPUC Monitoring Manager. Provide a detailed description for each item identified in the criteria list. If a criteria does not apply, clearly state why it does not apply. If items are left unanswered or the information provided is not adequate to show that the changes would not result in significant new impacts, the request may be denied or returned for additional information.

Criteria

1. Declare category of project change request: Project Variance, Temporary Extra Workspace (TEWS), or Minor Field Change
2. Provide a reason why the project change has been submitted under the chosen category (Project Variance, Temporary Extra Workspace (TEWS), or Minor Field Change)
3. Describe how the proposed change deviates from the project description and IS/MND requirements.
4. Provide date of request and any review time requests.
5. Provide the start and end dates of the project change, including daily time use.
6. Provide a detailed description of why the requested project change is needed.
7. Describe the requested project change in detail.
8. Provide a detailed description of the location. Provide maps, photos, and or other supporting documents.
9. Provide the current land use of the location.
10. Describe the expected condition of site after use.
11. Explain whether landowner notification and approval is required. If not, explain why; if so, provide documentation of notification and approval.
12. Provide survey information for environmental resources at the location. If a survey has been completed or was previously completed, be sure to describe the results for the area of interest.
13. Address the following resource questions for the proposed change:
 - A. **Air Quality:** Would equipment be on site or idled for more than 5 minutes? Would there be dust-producing activities? Be sure to quantify air impacts.
 - B. **Biological Resources:** Would use of the site result in potential impacts to sensitive biological resources? Would use of the site result in potential for the spread of noxious weeds?
 - C. **Cultural and Paleontological Resources:** Would clearing or grading be required?
 - D. **Hazards:** Would additional hazards be associated?
 - E. **Land Use and Recreation:** Would use of site block access to local land uses and recreational areas?
 - F. **Noise:** Are noise-sensitive receptors (e.g., homes, schools, hospitals, churches, convalescent homes, parks, recreational areas) adjacent to the site?
 - G. **Socioeconomics:** Would access to business be blocked? Would there be disruption of business operations?
 - H. **Traffic:** Would parking be eliminated? Would increased construction traffic result in impacts to the existing flow of traffic? Is the site within a residential area?

- I. **Visual:** Would lights at the site create glare for adjacent land uses (including roadways)?
Would construction materials or equipment be visible to receptors or roadways?
- J. **Water Resources:** Would runoff from the site flow into storm drains or a waterway? Would equipment refueling or maintenance be performed? Would materials block/impact storm drains or gutters?

Note all IS/MND project requirements, as well as permit conditions and mitigation measures apply, unless otherwise approved and specified. Jurisdictional agency approval may be required for project changes. Any approved activities or sites may be inspected by the CPUC EM at any time. Approved changes may be revoked at any time.

Appendix E:
Mitigation Monitoring Program Table

Table 1: Preconstruction Mitigation Measures

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<i>Biology</i>				
APM Biology 1: A pre-construction nesting survey by a qualified biologist shall be conducted for nesting birds and special-status bird species in the project alignment and buffer area. If no nesting birds or special-status bird species are found, project activities will proceed and no further mitigation measures will be required. If active nests are identified in these areas, the qualified biologist will determine the appropriate avoidance buffer taking into consideration existing noise of the roadway and proximity of work to the roadway. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site.	Hire a qualified biologist to conduct pre-construction nesting survey and special-status bird surveys. Implement avoidance measures, as needed.	Review survey report. Verify that avoidance measures have been implemented, if necessary.	CPUC, ExteNet, qualified biologist, and the Construction Contractor.	Survey prior to construction. Implement avoidance measures during construction, as needed.
Biology-1. Prior to project construction and in the appropriate blooming period , a qualified botanist shall perform a botanical survey to determine the presence of any	Hire a qualified botanist to perform botanical surveys.	Review survey report. Verify that appropriate avoidance buffers are or restoration plan is	CPUC, ExteNet, qualified botanist, CDFG, USFWS, and the Construction	Survey prior to project construction. Implement

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>special-status plant species within the project alignment. If any special status plant species are determined to be present within the alignment, one of the following mitigation measures shall be implemented:</p> <ul style="list-style-type: none"> ▪ The project alignment will be modified to completely avoid biologically sensitive areas; or ▪ The areas surrounding the special-status plants shall be avoided and protected by the installation of high-visibility construction fencing and signage designating the environmentally sensitive area; plywood or silt fences may also be installed as needed to further protect the special-status plants from sediment-laded stormwater or fill dirt. Worker-awareness tailgate training shall be implemented to inform all workers of this sensitive area. ▪ Where impacts to sensitive plants cannot be avoided, a 	<p>Implement avoidance buffers, or develop a restoration plan if a special status plant species is identified within the project area. Coordinate with CDFG and USFWS if the species is federally or state listed.</p>	<p>implemented, as needed.</p>	<p>Contractor.</p>	<p>avoidance buffers or restoration plan, as needed during construction.</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>plan shall be prepared by a qualified biologist for restoration (as well as an attempt at relocation of the individual plant) and seeds of the plant shall be collected. The plan shall include at a minimum (a) the location of where the plant shall be seeded or replanted, with preference for on-site replacement such as over the pipeline route; (b) the plant species and seeding rate; (c) a schematic depicting the replanting or seeding area; (d) the planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on-site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the</p>				

APPENDIX E: MITIGATION MONITORING PROGRAM TABLE

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>mitigation site in perpetuity. The plan shall be prepared and implemented prior to allowing disturbance within 100 feet of the plant.</p> <ul style="list-style-type: none"> ▪ Five federally and/or state listed threatened or endangered plant species have a low potential for occurrence. If one of these species is identified and cannot be avoided, CDFG and USFWS shall be consulted, and the restoration plan or equivalent measures shall be approved by the agencies prior to allowing any disturbance within 100 feet of the plant. 				
<p>Biology-4: Pre-construction nesting surveys shall be conducted not more than 30 days prior to construction if construction occurs in the nesting season (March 1 through August 31), and shall be repeated if no work occurs within 30 days. Pre-construction nesting surveys will not be required if construction occurs outside the nesting season. The surveys shall be</p>	<p>Hire a qualified biologist to conduct surveys.</p> <p>Implement avoidance buffers, or consult with USFWS and CDFG to conduct work within 500 feet of a nest.</p>	<p>Review biological survey.</p> <p>Verify that avoidance buffers or mitigation measures are in place as appropriate.</p>	<p>CPUC, ExteNet, qualified biologist, CDFG, USFWS, and the Construction Contractor.</p>	<p>Survey no more than 30 days prior to construction for construction during the nesting season (March 1 through August 31).</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>conducted for areas within 500 feet of the project alignment. If during the surveys, marbled murrelet nests are identified, no work within 500 feet of such nests shall commence until USFWS and CDFG are consulted. Work within 500 feet of a nest shall be avoided until a qualified biologist has determined the young have fledged and are independent of the nest site. Other equivalent measures approved by USFWS and CDFG can be implemented in lieu of the buffer.</p>				
<i>Cultural Resources</i>				
<p>Cultural Resources-1: ExteNet shall require all contractors and subcontractors to inform the crew about the potential for archaeological and paleontological discoveries during construction. A qualified archaeologist and paleontologist shall provide a brief training session to all construction personnel on how to identify such resources, including a description of the kinds of cultural resources that might be encountered during construction. The training session shall also outline the appropriate responses to take if such discoveries are made during construction</p>	<p>Hire a qualified archaeologist to provide cultural resource training.</p>	<p>Verify that cultural resource training was provided to construction personnel.</p>	<p>CPUC, ExteNet, qualified archaeologist, and the Construction Contractor.</p>	<p>Prior to construction. Prior to work on-site for new personnel or contractors.</p>

APPENDIX E: MITIGATION MONITORING PROGRAM TABLE

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
activities.				
Geology				
<p>Geology-1: Prior to the issuance of any grading permits, a geotechnical investigation and report shall be prepared by a qualified Geotechnical Engineer and submitted to Caltrans for review and confirmation that the proposed project fully complies all applicable codes and standards. The report shall determine the proposed project’s surface geotechnical conditions and address potential structural hazards. The recommendations, measures, design criteria, and specifications set forth in the geotechnical investigation and report shall be followed and incorporated into the project.</p>	<p>Hire a Geotechnical Engineer to prepare a geotechnical report. Submit report to CalTrans for review. Implement recommendations and measures in report.</p>	<p>Review geotechnical report. Verify that the report recommendations and measures are being implemented in the field.</p>	<p>CPUC, ExteNet, geotechnical engineer, Caltrans, and the Construction Contractor.</p>	<p>Prepare report and submit to CalTrans prior to construction. Implement recommendations and measures included in report during construction.</p>
Hazards				
<p>APM Hazards-1: The applicant shall perform the following tasks in order to minimize the potential for hazardous materials contamination through the transport, use, or disposal of hazardous materials:</p> <ul style="list-style-type: none"> ▪ The applicant shall prepare an SPCP for construction 	<p>Prepare SPCP. Train site workers to recognize and respond to spills and recognize and respond to fire hazards. Maintain equipment and utilize drip pans during</p>	<p>Verify that an SPCP has been prepared. Documentation of site worker training. Verify in the field that the measure has been implemented.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>Prepare SPCP and train workers prior to construction. Maintain equipment and chemical toilets throughout construction activities.</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>activities. At a minimum, the plan will include standard operating procedures for spill prevention, hazard assessment, spill prevention and containment, emergency response procedures, and closing the spill incident.</p> <ul style="list-style-type: none"> ▪ Before construction begins, site workers will be trained to recognize and respond to spills in accordance with the SPCP, and will be informed regarding which authorities to contact in the event of a spill. [...] ▪ [...] ▪ [...] ▪ [...] ▪ ExteNet shall require all contractors to provide training regarding the proper handling and/or storage of potential fire hazards, potential ignition sources (such as smoking or sparking equipment), 	<p>equipment maintenance and refueling.</p> <p>Place chemical toilets outside of environmentally sensitive areas and maintain toilets.</p> <p>Dispose of hazardous materials in accordance with state and federal regulations, as needed.</p>			

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>and appropriate types of fire protection equipment.</p>				
<p>APM Hazards-2: The applicant shall take the following measures to reduce the risk of accidental fires, vehicle collisions, and other hazardous situations and events:</p> <ul style="list-style-type: none"> ▪ The construction contractor will develop and implement a Health and Safety Plan consistent with 29 CFR 1910 (OSHA Standards) and 29 CFR 1926 (OSHA Safety and Health Regulations for Construction). The Health and Safety Plan will identify physical and chemical hazards that could result from proposed operations. ▪ ExteNet shall require all contractors to train their construction crews in the following safety measures: trenching and excavation safety, work zone safety, cardiopulmonary resuscitation (CPR), spill prevention and control, and driving safety. 	<p>Develop health and safety plan.</p> <p>Train construction crews in safety measures as required in the measure.</p>	<p>Verify that a health and safety plan was prepared.</p> <p>Documentation of construction crew training.</p>	<p>CPUC, Extenet, and Construction Contractor.</p>	<p>Prior to the start of construction.</p> <p>New workers would be trained prior to working on site.</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>APM Hazards-3: The applicant shall identify all utility lines within the project alignment prior to any construction activities to reduce the possibility of rupturing, severing, or damaging gas, electric, or sewer lines located in the project region.</p>	<p>Identify utility lines.</p>	<p>Verify that utility lines have been identified.</p>	<p>CPUC, Extenet, and Construction Contractor.</p>	<p>Prior to construction.</p>
<p>Hydrology</p>				
<p>APM Hydrology-1: The applicant shall implement the following BMPs throughout project construction activities:</p> <ul style="list-style-type: none"> ▪ The applicant shall develop an Erosion Control Plan. Temporary sediment barriers shall be placed near storm drains and sensitive habitat areas adjacent to ground disturbing activities to prevent any construction materials, sediment, or debris from entering these areas. Such devices may include gravel bags, straw wattles, and silt fence. These devices shall be left in place until restoration activities are deemed successful and complete. 	<p>Implement BMPs are required in the measure.</p> <p>Train workers on-site to recognize and avoid waters.</p> <p>Develop and implement SPCP.</p>	<p>Verify in the field that BMPs have been implemented. Prepare BMP reports.</p> <p>Documentation of worker training.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>Prior to construction, and throughout the duration of construction including site restoration.</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<ul style="list-style-type: none"> ▪ [...] ▪ ExteNet shall require all contractors to train their construction personnel on the sensitive types of water resources found in the local area, and on the measures to avoid or minimize impacts to these resources. As necessary, orange construction fencing and warning signage will be placed around water resources in the vicinity of ground-disturbing activities. ▪ The applicant shall develop and implement a SPCP. This plan will describe potential sensitive water resources in the project area, measures to avoid and minimize impacts to these resources, and measures to deal with any accidental spills occurring during construction of the proposed project. ▪ [...] 				
<i>Traffic</i>				

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>APM Traffic-1: Project traffic control measures will conform to the specifications of Caltrans and San Mateo County. The contractors retained for project construction will follow Caltrans' Standard Plan T13 ("Traffic Control System for Lane Closure On Two-Lane Conventional Highways") to manage traffic during the construction of the Project and to ensure that construction activity will not create unsafe traffic conditions. The Plan will include the use of portable warning signs, flaggers, and cones/barricades that will separate the construction activities from traffic.</p>	<p>Implement traffic control measures in accordance with the measure.</p>	<p>Verify in the field that traffic control measures have been implemented.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>During project construction.</p>

Table 2: Construction Mitigation Measures

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<i>Aesthetics</i>				
Applicant Proposed Measure (APM) Aesthetics-2: Existing wood utility poles, or replacement wood poles at the same locations, will be used for all aerial cable conduit. New poles associated with the project will be limited to the 17 communication node locations.	Utilize existing wood poles. Limit new poles to the 17 communication node locations	Verify in the field that existing poles have been used or replacement poles are in the same location as the existing poles.	CPUC, ExteNet, and the Construction Contractor.	During construction.
APM Aesthetics-4: Wood poles will be used for all new poles to blend with surrounding trees. Node equipment, including galvanized risers, electrical meters, repeaters, and fiber optic splice boxes, will be painted brown in color to help them blend into the surrounding natural environment. With the exception of Node #8, antennae around each new utility pole will be positioned in a single circle to minimize the visual presence of the nodes.	Utilize wood poles. Paint node equipment brown. Position node antennae in a single circle.	Verify in the field that the measure has been implemented.	CPUC, ExteNet, and the Construction Contractor.	During construction.
Aesthetics-1: To maintain the visual integrity of the Skeggs Point scenic vista area, all equipment associated with construction of Node #8 shall be removed from the site daily.	Remove construction equipment daily from Node#8.	Verify in the field that construction equipment is removed daily from the site.	CPUC, ExteNet, and the Construction Contractor.	During construction of Node #8.
Aesthetics-2: All construction activities	Limit construction	Verify that	CPUC, ExteNet, and	During construction

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
associated with Node #8 shall occur during weekdays with no construction activities occurring during weekends or holidays.	activities to weekdays at Node #8.	construction activities have been limited to the schedule defined in the measure for Node #8.	the Construction Contractor.	of Node #8.
Aesthetics-3: The antenna array on Node #8 shall be positioned in a circle close to the utility pole to conform to the design of other communication nodes that are part of the project.	Position the antenna array at Node #8 to comply with the measure.	Verify that the antenna array at Node #8 complies with the measure.	CPUC, ExteNet, and the Construction Contractor.	During construction of Node #8.
Aesthetics-4: All communication node features will include integral non-reflective coloring or be painted to be a non-reflective brown color in order to minimize glare created by these facilities.	Select a non-reflective coloring, or paint the facilities with non-reflective paint.	Verify in the field that a non-reflective coloring was selected, or non-reflective paint was applied.	CPUC, ExteNet, and the Construction Contractor.	Prior to the start of construction and during construction of node facilities.
Air Quality				
<p>Air Quality-1: The following Best Management Practices shall be implemented to reduce construction air quality impacts:</p> <ul style="list-style-type: none"> ▪ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 	<p>Implement dust suppression techniques in accordance with the measure.</p> <p>Limit vehicle speeds and idling times.</p> <p>Maintain equipment.</p> <p>Designate a lead contact person for dust</p>	Verify in the field that dust is controlled.	CPUC, ExteNet, and the Construction Contractor.	Throughout the duration of construction.

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<ul style="list-style-type: none"> ▪ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ▪ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. ▪ All vehicle speeds on unpaved roads shall be limited to 15 mph. ▪ Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. ▪ All construction equipment 	<p>complaints with the authority to provide corrective measures.</p>			

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<p>shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.</p> <ul style="list-style-type: none"> ▪ A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours to any complaint. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. 				
Biology				
<p>Biology-2. Prior to project construction each morning, a qualified biologist shall perform daily sweeps for the presence of any special-status animal species within the project alignment or within 50 feet of construction activities. If any special status animal species are determined to be</p>	<p>Hire a qualified biologist to survey the project area daily.</p> <p>If special-status species are identified, implement avoidance buffers, as appropriate.</p>	<p>Review the biological survey.</p> <p>Verify in the field that avoidance buffers have been implemented or work halted, as needed.</p>	<p>CPUC, ExteNet, qualified biologist, CDFG, USFWS, and the Construction Contractor.</p>	<p>Daily, prior to construction and throughout the duration of construction.</p>

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<p>present within the alignment, the following mitigation measures shall be implemented, as appropriate:</p> <ul style="list-style-type: none"> ▪ The biologist shall identify any potential kangaroo rat or badger burrows within 50 feet of construction activities. The burrow shall be marked and avoided and any work that must be performed in proximity of the burrow (within 50 feet) shall be performed in the presence of the biological monitor. The biological monitor shall have the authority to stop work and implement new buffers if the animal is showing signs of distress. ▪ The biologist shall identify any woodrat nests. Woodrat nests shall be avoided and any work that must be performed in proximity of the nest (within 50 feet) shall be performed in the presence of the biological monitor. The biological monitor 	<p>Implement exclusion fencing as needed in coordination with CDFG and USFWS. Stop work at the direction of the qualified biologist, and as directed by the measure.</p>			

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<p>shall have the authority to stop work and implement new buffers if the animal is showing signs of distress.</p> <ul style="list-style-type: none"> ▪ Trees within 50 feet of the work area shall be checked for bats. If bats are found, the trees shall be avoided and any work that must be performed in proximity of the tree shall be performed in the presence of the biological monitor. The biological monitor shall have the authority to stop work and implement new buffers if the animal is showing signs of distress. ▪ A biological monitor shall be present during project construction. If a special status animal species is found foraging or traveling through the project construction alignment, construction shall be halted in the area of the animal until the animal moves out of harms way on its own. ▪ Exclusion fencing can be installed at the 				

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<p>recommendation of the biologist and in accordance with CDFG and/or USFWS regulations and recommendations</p> <ul style="list-style-type: none"> ▪ If special status invertebrates are found within the project areas, they will be avoided or relocated by the qualified biologist. ▪ No work shall commence if California red-legged frogs, San Bruno elfins, or unsilvered fritillaries are found during the morning sweep until USFWS and/or CDFG is contacted and recommended measures are implemented. 				
<p>Biology-3: Construction best management practices shall be implemented during project construction to minimize impacts to wildlife in the project area, and will include the following:</p> <ul style="list-style-type: none"> ▪ Any holes, trenches, pits, and tanks that are still open at the end of the construction work day shall either be covered or 	<p>Inspect and cover or fence holes, trenches, pits and tanks.</p> <p>Revegetate and restore project route.</p> <p>Keep pets out of the project site.</p> <p>Do not intentionally</p>	<p>Verify in the field that BMPs have been implemented.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>During construction.</p>

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<p>fenced temporarily to prevent entry.</p> <ul style="list-style-type: none"> ▪ Any holes, trenches, pits, and tanks that are still open at the end of the construction work day shall be monitored and inspected by construction personnel at the end of the construction day to determine whether trapped wildlife are present before hole closure. ▪ The project route shall be restored to its original condition upon completion of construction activities. This restoration shall include re-vegetation where necessary. Re-vegetation shall use plant materials native to the area. ▪ No pets shall be allowed on the project site. ▪ No animals shall be deliberately injured or killed during construction activities. 	<p>harm or kill any animals.</p>			
<p>Biology-4: Pre-construction nesting surveys shall be conducted not more than</p>	<p>Hire a qualified biologist</p>	<p>Review biological</p>	<p>CPUC, ExteNet, qualified biologist,</p>	<p>Survey no more than 30 days prior to</p>

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<p>30 days prior to construction if construction occurs in the nesting season (March 1 through August 31), and shall be repeated if no work occurs within 30 days. Pre-construction nesting surveys will not be required if construction occurs outside the nesting season. The surveys shall be conducted for areas within 500 feet of the project alignment. If during the surveys, marbled murrelet nests are identified, no work within 500 feet of such nests shall commence until USFWS and CDFG are consulted. Work within 500 feet of a nest shall be avoided until a qualified biologist has determined the young have fledged and are independent of the nest site. Other equivalent measures approved by USFWS and CDFG can be implemented in lieu of the buffer.</p>	<p>to conduct surveys. Implement avoidance buffers, or consult with USFWS and CDFG to conduct work within 500 feet of a nest.</p>	<p>survey. Verify that avoidance buffers or mitigation measures are in place as appropriate.</p>	<p>CDFG, USFWS, and the Construction Contractor.</p>	<p>construction for construction during the nesting season (March 1 through August 31).</p>
<p><i>Cultural Resources</i></p>				
<p>APM Cultural Resources 1: Should any signs of historic or archeological resources be observed during excavation or ground-disturbing activities, the following measures shall be implemented:</p> <ul style="list-style-type: none"> ▪ If archeological resources are discovered during 	<p>Hire a certified archaeologist to monitor construction, record details of the find, prepare recovered artifacts and develop a mitigation plan and final mitigation plan, if signs</p>	<p>Verify that the measure has been implemented if historic or archaeological resources are observed.</p>	<p>CPUC, ExteNet, certified archaeologist, State Historic Preservation Office, and the Construction Contractor.</p>	<p>During excavation and ground disturbing activities, if signs of historic or archaeological resources are observed.</p>

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<p>excavation or ground disturbing activities, a certified archeologist shall be retained by the applicant to monitor construction excavations and to produce a mitigation plan for the proposed project. Archeological monitoring shall include inspection of exposed materials to determine if artifacts are present. The monitor shall have authority to temporarily divert grading away from exposed resources in order to recover specimens.</p> <ul style="list-style-type: none"> ▪ The certified archeologist shall record all details of the find on field data forms, and shall prepare monthly progress reports to be filed with the applicant and the CPUC. ▪ Recovered artifacts shall be prepared to the point of curation, identified by qualified experts, listed in a database to allow analysis, 	<p>of historic or archaeological resources are observed.</p>			

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<p>and deposited in a designated repository.</p> <ul style="list-style-type: none"> ▪ The certified archeologist shall prepare a final mitigation report to be filed with the applicant, the CPUC, and the repository. ▪ If human remains are encountered during the course of excavation, all construction activities in the vicinity of the find shall cease, and the San Mateo County coroner and Native American representatives (if appropriate) shall be contacted to identify the find and determine the proper course of action. 				
<p>APM Cultural Resources 2: If fossil or other paleontological materials are observed during the course of ground disturbing activities, such ground disturbing activities shall cease and a certified paleontologist shall be retained to monitor all further excavation activities at the site of the discovery. Paleontological resources discovered during construction activities shall be reported immediately to the applicant and the CPUC. The certified</p>	<p>Cease ground disturbing activities and hire certified paleontologist to monitor activities, if paleontological resources are discovered.</p> <p>Report paleontological resources to CPUC.</p> <p>Evaluate resources and</p>	<p>Verify that the measure has been followed and reports prepared if a resource is encountered.</p>	<p>CPUC, ExteNet, certified paleontologist, State Historic Preservation Office, and the Construction Contractor.</p>	<p>During ground disturbing activities, paleontological materials are observed.</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
<p>paleontologist shall immediately evaluate the paleontological resources that have been discovered to determine if they are significant, and shall prepare a monitoring and mitigation plan that will address what monitoring will take place and how paleontological resources will be handled. The paleontological monitor shall be empowered to temporarily halt or redirect excavation activities in order to evaluate and recover the paleontological resources.</p> <p>Upon completion of the evaluation and recovery of the paleontological resources, a report of findings shall be prepared by the certified paleontologist and submitted to the applicant and the CPUC. This report shall include the following at a minimum:</p> <ul style="list-style-type: none"> ▪ a statement of the type of paleontological resources found ▪ the methods and procedures used to recover the paleontological resources ▪ an inventory of the specimens recovered ▪ a statement of the scientific significance of the 	<p>prepare monitoring and mitigation plan.</p> <p>Prepare report of findings in accordance with the measure.</p> <p>Donate paleontological specimens to qualified scientific institution.</p>			

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<p>paleontological resources</p> <p>The paleontological specimens recovered as a result of mitigation shall be donated to a qualified scientific institution where they would be afforded long-term preservation to allow future scientific study.</p>				
<p>Cultural Resources-1: ExteNet shall require all contractors and subcontractors to inform the crew about the potential for archaeological and paleontological discoveries during construction. A qualified archaeologist and paleontologist shall provide a brief training session to all construction personnel on how to identify such resources, including a description of the kinds of cultural resources that might be encountered during construction. The training session shall also outline the appropriate responses to take if such discoveries are made during construction activities.</p>	<p>Hire a qualified archaeologist to provide cultural resource training.</p>	<p>Verify that cultural resource training was provided to construction personnel.</p>	<p>CPUC, ExteNet, qualified archaeologist, and the Construction Contractor.</p>	<p>Prior to construction. Prior to work on-site for new personnel or contractors.</p>
<p>Geology</p>				
<p>APM Geology-1: The applicant shall use excavated materials to backfill trenches in order to minimize erosion and soil settlement.</p>	<p>Backfill trenches with excavated material.</p>	<p>Verify in the field that trenches are filled with excavated material.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>During filling of trenches.</p>

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
APM Geology-2: Unpaved areas shall undergo a grading process at the end of construction activities to restore the gradient to its original state. The disturbed area shall then be fertilized, mulched, and seeded with native vegetation.	Restore unpaved areas as required in the measure.	Verify in the field that unpaved areas are restored and final stabilization measures have been implemented.	CPUC, ExteNet, and the Construction Contractor.	At the completion of grading/construction.
Geology-1: Prior to the issuance of any grading permits, a geotechnical investigation and report shall be prepared by a qualified Geotechnical Engineer and submitted to Caltrans for review and confirmation that the proposed project fully complies all applicable codes and standards. The report shall determine the proposed project's surface geotechnical conditions and address potential structural hazards. The recommendations, measures, design criteria, and specifications set forth in the geotechnical investigation and report shall be followed and incorporated into the project.	Hire a Geotechnical Engineer to prepare a geotechnical report. Submit report to CalTrans for review. Implement recommendations and measures in report.	Review geotechnical report. Verify that the report recommendations and measures are being implemented in the field.	CPUC, ExteNet, geotechnical engineer, Caltrans, and the Construction Contractor.	Prepare report and submit to CalTrans prior to construction. Implement recommendations and measures included in report during construction.
Hazards				
APM Hazards-1: The applicant shall perform the following tasks in order to minimize the potential for hazardous materials contamination through the transport, use, or disposal of hazardous	Prepare SPCP. Train site workers to recognize and respond to spills and recognize and respond to fire	Verify that an SPCP has been prepared. Documentation of site worker training.	CPUC, ExteNet, and the Construction Contractor.	Prepare SPCP and train workers prior to construction. Maintain equipment and chemical toilets

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<p>materials:</p> <ul style="list-style-type: none"> ▪ [...] ▪ [...] Construction crews will have an emergency spill kit containing absorbent booms and pads, personal protective equipment, and emergency response guidance. ▪ Construction equipment will be maintained and kept in operating condition to reduce the likelihood of line breaks and leakage. Any vehicles with chronic or continuous leaks will be removed from the construction site and repaired before being returned to operation. ▪ Absorbent material or drip pans will be placed underneath vehicles during equipment maintenance or refueling. Refueling will take place only in designated areas. Any fluids drained from equipment will be collected in leak proof containers 	<p>hazards.</p> <p>Maintain equipment and utilize drip pans during equipment maintenance and refueling.</p> <p>Place chemical toilets outside of environmentally sensitive areas and maintain toilets.</p> <p>Dispose of hazardous materials in accordance with state and federal regulations, as needed.</p>	<p>Verify in the field that the measure has been implemented.</p>		<p>throughout construction activities.</p>

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<p>and taken to an appropriate disposal or recycling facility.</p> <ul style="list-style-type: none"> ▪ Human waste at the construction area will be disinfected. Portable chemical toilets will be used. The toilets will not be placed near environmentally sensitive areas. A commercial worker will maintain the self-contained chemical toilets in good working order to ensure that there are no leaks and will pump the toilets as necessary to prevent overflow. The vendor will be responsible for off-site disposal of the wastes. ▪ All hazardous waste generated if a spill occurs during construction will be disposed of according to appropriate state and federal regulations. The appropriate disposal method will depend on the type of waste generated. Waste oils and other wastes 				

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<p>considered hazardous in California will be transported by an RCRA-certified treatment, storage, and disposal facility and disposed at a Class I hazardous waste landfill.</p> <ul style="list-style-type: none"> ▪ [...] 				
<p>APM Hazards-4: Project personnel will be required to smoke only in their vehicles and dispose of cigarette butts properly.</p>	<p>Restrict smoking on site as required in the measure.</p>	<p>Verify that there is no smoking on-site except in worker vehicles and cigarette butts are properly disposed of.</p>	<p>CPUC, Extenet, and Construction Contractor.</p>	<p>Throughout construction.</p>
Hydrology				
<p>APM Hydrology-1: The applicant shall implement the following BMPs throughout project construction activities:</p> <ul style="list-style-type: none"> ▪ The applicant shall develop an Erosion Control Plan. Temporary sediment barriers shall be placed near storm drains and sensitive habitat areas adjacent to ground disturbing activities to prevent any construction materials, sediment, or debris from entering these 	<p>Implement BMPs are required in the measure.</p> <p>Train workers on-site to recognize and avoid waters.</p> <p>Develop and implement SPCP.</p>	<p>Verify in the field that BMPs have been implemented. Prepare BMP reports.</p> <p>Documentation of worker training.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>Prior to construction, and throughout the duration of construction including site restoration.</p>

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<p>areas. Such devices may include gravel bags, straw wattles, and silt fence. These devices shall be left in place until restoration activities are deemed successful and complete.</p> <ul style="list-style-type: none"> ▪ Following installation of the communications system, trenched and excavated areas shall be compacted and graded to the natural contours of the area following construction activities, and reseeded with native vegetation. ▪ [...] As necessary, orange construction fencing and warning signage will be placed around water resources in the vicinity of ground-disturbing activities. ▪ The applicant shall develop and implement a SPCP. This plan will describe potential sensitive water resources in the project area, measures to avoid and minimize impacts to these resources, and 				

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<p>measures to deal with any accidental spills occurring during construction of the proposed project.</p> <ul style="list-style-type: none"> ▪ Containment and cleanup materials shall be present at all boring sites in case a frac-out or spill of boring materials occurs. Containment equipment may include such devices as sand bags, straw wattles, sedimentation fencing, and portable vacuum trucks and pumps. 				
Noise				
<p>APM Noise 1: ExteNet shall comply with the construction hours of operation established by the San Mateo County Noise Ordinance. Approved construction hours take place between 7:00 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays. Construction is prohibited on Sundays, Christmas, and Thanksgiving.</p>	<p>Limit construction hours as required in the measure.</p>	<p>Verify in the field that construction hours have been limited as required.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>Throughout the duration of construction.</p>
<p>APM Noise-2: The following BMPs shall be implemented during construction of the proposed project to minimize noise</p>	<p>Implement noise BMPs as required in the measure.</p>	<p>Verify in the field that noise BMPs have been implemented.</p>	<p>CPUC, ExteNet, and the Construction Contractor.</p>	<p>Throughout the duration of construction.</p>

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<p>impacts:</p> <ul style="list-style-type: none"> ▪ All construction equipment shall be equipped with improved noise muffling, and shall maintain the manufacturer’s recommended noise abatement measures, such as mufflers, engine covers, and engine isolators in good working condition. ▪ Stationary equipment that generates noise levels in excess of 65 dBA Leq shall be located as far away from existing rural residential areas as possible. ▪ Heavy duty vehicle storage and start-up areas shall be located a minimum of 150 feet from occupied residences where feasible. ▪ All equipment shall be turned off if not in use for more than five minutes. 				
Traffic				
<p>APM Traffic-1: Project traffic control measures will conform to the specifications of Caltrans and San Mateo County. The</p>	<p>Implement traffic control measures in accordance with the</p>	<p>Verify in the field that traffic control measures have been</p>	<p>CPUC, ExteNet, and the Construction</p>	<p>During project construction.</p>

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contractors retained for project construction will follow Caltrans' Standard Plan T13 ("Traffic Control System for Lane Closure On Two-Lane Conventional Highways") to manage traffic during the construction of the Project and to ensure that construction activity will not create unsafe traffic conditions. The Plan will include the use of portable warning signs, flaggers, and cones/barricades that will separate the construction activities from traffic.	measure.	implemented.	Contractor.	
APM Traffic-2: Complete closure of any residential or commercial driveway shall not occur during project construction. If the Project requires work across any driveways during trenching or excavation, large metal plates shall be placed across the trenches or excavated areas in order to allow ingress and egress for local residents, business owners, and emergency vehicles.	Allow access to driveways.	Verify in the field that driveways are accessible.	CPUC, ExteNet, and the Construction Contractor.	During project construction.
APM Traffic-3: In the event of an emergency, project activities will be suspended in order to allow through access on SR 35 for emergency vehicles and operations.	Suspend project activities to allow through access of emergency vehicles on SR 35.	Verify that emergency vehicles are allowed access on SR 35.	CPUC, ExteNet, and the Construction Contractor.	In the event of an emergency.
Traffic-1: Lane closures will be limited to	Limit lane closures to	Verify that lane	CPUC, Extenet, and	During construction.

Mitigation Measure	Implementing Action	Monitoring/Reporting Action	Responsible and Involved Parties	Implementation Schedule
non-peak travel periods (between 9 AM and 4 PM on weekdays) to minimize traffic delays on SR 35.	9AM to 4PM on weekdays.	closures have been limited to the specified time.	Construction Contractor.	