

6. Mitigation Monitoring Plan

Siskiyou Telephone proposes to construct and operate the Happy Camp to Somes Bar Fiber Connectivity Project (“Proposed Project”). An Initial Study was prepared to assess the Proposed Project’s potential environmental effects. The Initial Study was prepared based on information in the Proponent’s Environmental Assessment (PEA), project site visits, and supplemental research. The majority of the Proposed Project’s impacts would occur during project construction. Within Siskiyou Telephone’s application, Applicant Proposed Measures (APMs) were proposed to reduce potentially significant adverse impacts related to project construction and operation.

The purpose of this Mitigation Monitoring Plan is to ensure effective implementation of each APM, as well as the mitigation measures identified by the Initial Study and imposed by the CPUC as part of project approval.

This Mitigation Monitoring Plan includes:

- The Applicant Proposed Measures and mitigation measures that Siskiyou Telephone must implement as part of the Proposed Project;
- The actions required to implement these measures;
- The monitoring requirements; and
- The timing of implementation for each measure.

A CPUC-designated environmental monitor will carry out all construction field monitoring to ensure full implementation of all measures. In all instances where non-compliance occurs, the CPUC’s designated environmental monitor will issue a warning to the construction foreman and Siskiyou Telephone’s project manager. Continued non-compliance shall be reported to the CPUC’s designated project manager. Any decisions to halt work due to non-compliance will be made by the CPUC. The CPUC’s designated environmental monitor will keep a record of any incidents of non-compliance with mitigation measures, APM, or other conditions of project approval. Copies of these documents shall be supplied to Siskiyou Telephone and the CPUC.

6.1 Minor Project Refinements

The CPUC along with its environmental monitors will ensure that any project change or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements; no project changes will be approved by the CPUC if it creates new significant impacts. A project change should be strictly limited to minor refinements that will not trigger other permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. If a proposed change to the project has the potential for creating significant environmental effects, it will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, and Applicant Proposed Measures, and correction of such deviation, shall be reported immediately to the CPUC and the environmental monitor assigned to the construction spread for their review and approval. In some cases, a minor project refinements may also require approval by a CEQA responsible agency.

6.2 Dispute Resolution

It is expected that the Mitigation Monitoring Plan will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur. In such event, the following procedure will be observed:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC-designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the Proposed Project or adopted Mitigation Monitoring Plan.
- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the Mitigation Monitoring Plan cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written “notice of dispute” with the CPUC 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 for purposes of resolving 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.

Table 6-1. Mitigation Monitoring Plan

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
Air Quality			
APM AQ-1	To reduce fugitive emissions, construction of the proposed project would occur during the dry season (April through October). Water trucks would be present onsite to wet down the work area, including materials such as backfill and other construction components.	Ensure work areas are wet and particulate matter emissions are minimized	During construction
Reducing Air Pollutant Concentrations	<p>MM AQ-1: Control Construction-Related Dust. The Applicant shall implement the following dust control strategies and any other dust control measure that may be specified by the APCD through the review of a dust control plan for naturally-occurring asbestos:</p> <ul style="list-style-type: none"> ▪ Visible track-out on any paved public road shall be removed at the end of the work day or at least one time per day, with removal being accomplished by using wet sweeping or a HEPA filter equipped vacuum device. ▪ Storage piles shall be treated by either keeping the surface adequately wetted, stabilizing the surface with chemical dust suppressants, or covering with tarps or vegetative cover. ▪ Unpaved staging and work areas shall be watered every two hours of active operation or more frequently as needed or stabilized with chemical dust suppressants. ▪ Earthmoving areas and excavated materials shall be pre-wetted to the depth of the anticipated cuts. ▪ Trucks transporting excavated material off-site shall be: maintained such that no spillage can occur from holes or other openings in cargo compartments, loads shall be adequately wetted and covered with tarps or loaded such that the material does not touch the front, back or sides of the cargo compartment at any point less than six inches from the top and that no point of the load extends above the top of the cargo compartment. 	Ensure work areas are wet, roadways are cleaned, piles are stabilized, and particulate matter emissions are minimized	During construction
Biological Resources			
APM BIO-1	To minimize the likelihood of potential adverse effects on nesting birds and raptors, preconstruction nesting surveys would be conducted during the January 31 through August 31 bird nesting season. If active nests are observed prior to construction, a qualified biologist would be retained to monitor construction within 50 feet of the active nest for passerines or 300 feet for raptors.	Review survey report. Ensure biological monitor for active nests, if necessary.	Prior to and during construction
APM BIO-2	To minimize the likelihood of potential adverse effects on wildlife near the 10 stream crossings, preconstruction wildlife surveys would be conducted. In addition, a qualified biologist would be retained to monitor construction during directional boring activities.	Review survey report. Ensure biological monitor onsite during HDD activities.	Prior to and during construction
APM BIO-3	To minimize the potential for wildlife to become trapped in open trenches, each excavation would be securely backfilled or covered at the end of each work day. Only excavated onsite native materials would be used to backfill trenches. One side of each excavation would be ramped to allow wildlife egress in the unlikely event that entrapment occurs.	Ensure excavated areas are properly backfilled, ramped, and/or covered at the end of each work day	During construction

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Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
APM BIO-4	Construction access, and material laydown and staging would occur only on existing roads and previously disturbed sites.	Ensure all access, laydown and staging occurs on existing roads and previously disturbed areas.	During construction
APM BIO-5	To reduce the introduction and spread of noxious weeds, the project would use construction equipment that is currently being used near the project area in the Klamath National Forest and Six Rivers Forest. This equipment would not be used elsewhere prior to construction without proper decontamination procedures applied prior to deployment.	Review proof that construction equipment has been used nearby or has been properly decontaminated prior to deployment.	During construction
APM BIO-6	Spoils known to contain noxious weed propagules or that otherwise do not meet Caltrans backfill specifications would be removed and disposed of at a Caltrans-approved disposal site.	Ensure spoils are removed.	During construction
APM BIO-7	Temporary construction equipment sound levels would not exceed 90 dB.	Ensure noise threshold not exceeds and noise-related complaints from nearby sensitive receptors are minimized.	During construction
APM BIO-8	The contractor shall prepare and implement a plan for monitoring drilling operations and addressing frac-out if it occurs. The plan shall include visual inspections along the bore path of the pipeline alignment during all drilling operations. Monitors shall also be stationed at appropriate distances upstream and downstream from the crossing point. All equipment required to contain and clean up a frac-out release shall be available at the work site.	Review drilling monitoring plan. Ensure monitors present at appropriate distances from crossing points and frac-out equipment is onsite.	Prior to and during construction
APM BIO-9	To minimize risk of harming the Del Norte Salamander or red-legged frog (at Wyman Creek only), work shall be conducted during dry weather.	Ensure work at Wyman Creek is conducted during dry weather.	During construction at Wyman Creek

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Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
Special-Status Plant and Wildlife Species	<p>MM B-1: Conduct Environmental Training, Pre-Construction Surveys, and Biological Resources Monitoring. Siskiyou Telephone will develop and implement a Worker Environmental Awareness Program (WEAP) for construction crews and all Project personnel. The WEAP will be conducted by a qualified biologist (approved by CPUC) prior to the commencement of the Project and during construction activities. Sessions will include discussion of the Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA), California Species of Special Concern, other special-status species and listed species, identification and values of habitat, the consequences of noncompliance with these acts, and the importance of keeping all Project activities and sediments within the designated work area. Brochures summarizing special-status and listed species with potential to occur within the Project area, as well as Project requirements shall be provided to all crew members (in multiple languages if appropriate). A log shall be maintained of all trained personnel with names and dates of training, and shall be submitted to the CPUC on a monthly basis and made available for review by CDFW, USFWS, USFS, or other agencies upon request.</p> <p>Pre-construction sweeps of active work areas for special-status species shall be conducted prior to the start of construction each morning by a qualified biologist (approved by CPUC). If non-listed special-status species are found, they shall be relocated outside of the work area into adjacent appropriate habitat by the qualified biologist. If listed species are found, no work will occur in the vicinity until it has left the work area on its own, or unless otherwise authorized by USFWS and/or CDFW (as applicable). The CPUC Environmental Monitor shall be notified immediately of any special-status species or listed species observed in the Project area.</p> <p>Biological monitoring shall be conducted by a qualified biologist (approved by CPUC) during all construction activities near sensitive resources, including active bird nests and creeks. If work is being conducted during light rain, full time biological monitoring shall occur. The monitor will complete daily reports summarizing construction activities and environmental compliance and weekly reports shall be submitted to the CPUC. If appropriate (based on the phase and location of construction activities), Siskiyou Telephone may request that the CPUC allow less frequent monitoring.</p>	<p>Biologist resumes to be submitted to the CPUC for review and approval prior to the start of construction.</p> <p>WEAP brochure to be submitted to the CPUC for review and approval prior to construction.</p> <p>Weekly compliance reports shall be submitted to the CPUC for review.</p>	<p>Prior to and during construction</p>

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Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
Special-Status Plant and Wildlife Species	<p>MM B-2: Preserve Special-Status Plants, Wetlands, and Riparian Zones. The following avoidance and minimization measures shall be implemented to protect both listed special-status plants, and to avoid impacts to wetlands and riparian zones:</p> <ul style="list-style-type: none"> ▪ Design Project and construction activities to avoid impacts to wetlands and water features to the extent feasible. ▪ Prior to the onset of construction activities, a qualified biologist (approved by the CPUC) shall delineate any wetland or water features within the right-of-way as environmentally sensitive areas using clear markers. Construction crews shall be provided with maps of environmentally sensitive areas. No equipment, materials, or spoils shall encroach into the environmentally sensitive areas except for spill remediation purposes. ▪ A qualified biologist (approved by the CPUC) shall be present during construction activities within the vicinity of wetlands, creek crossings, and associated riparian zones. The biologist shall ensure that fencing remains intact and that construction activities do not affect the delineated areas. 	<p>Ensure wetland and water features are clearly marked for avoidance.</p> <p>Confirm construction crews have maps with environmentally sensitive areas.</p> <p>Ensure that no equipment, materials, or spoils encroach into environmentally sensitive areas.</p> <p>Ensure monitors present when working near wetlands, creek crossings, and associated riparian zones.</p>	<p>Prior to and during construction</p>
Special-Status Plant and Wildlife Species	<p>MM B-3: Minimize Horizontal Directional Drilling (HDD) Potential Impacts. The following avoidance and minimization measures shall be implemented to protect listed and other special-status plants and animals, and to avoid impacts to wetlands and riparian zones:</p> <ul style="list-style-type: none"> ▪ Boring activities and set-up activities for boring operations shall be situated outside of wetlands and riparian areas. An earthen or sandbag berm shall be installed around all drilling fluid mixing and pumping areas to contain any inadvertently spilled material. Sediment control devices shall be installed between the drilling staging areas and any waterways. This includes any culverts or drainage ditches that lead to a waterway. ▪ HDD operations at the creek crossings shall be limited to daylight hours because of the difficulty in identifying the loss of bentonite or machine pressure without daylight. This shall be defined by the termination of drilling 30 minutes before dusk, and resumption of drilling at dawn. The contractor will make every effort to schedule drilling activities to be completed between dawn and 30 minutes to dusk. Should the drilling activities be within one hour of completion, 30 minutes before dusk, drilling activities may be allowed to continue until completion if the Project environmental monitor and/or the CDFW or its agents determine that completing the drilling activities will result in less risk to the stream. ▪ Visual inspection along the bore alignment for frac-outs shall take place at all times while the drill is in operation. The monitor shall be in radio contact with the boring machine operator at all 	<p>Ensure boring operations are situated outside of wetlands and riparian areas.</p> <p>Ensure drilling is conducted during daylight hours.</p> <p>Review and approve Frac-Out Contingency Plan.</p> <p>Ensure any frac-outs are handled according to the approved Frac-Out Contingency Plan.</p>	<p>Prior to and during construction</p>

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	<p>times. A biologist/monitor's presence shall be required during all boring activities (i.e. boring, back reaming, etc.) within CDFW jurisdiction unless the drainage is dry.</p> <ul style="list-style-type: none"> ▪ The HDD Operator shall design, pre-plan, and direct the HDD operation in such a way as to minimize the risk of spills of all types. The HDD Operator shall prepare and implement a Frac-Out Contingency Plan and submit it to the CPUC and CDFW for review and approval 30 days prior to construction, which includes the boring plans and frac-out and clean-up plans, in the event of the accidental release of drilling lubricants through fractures in the streambed or bank ("frac-outs"). In substrates where frac-outs are likely to occur, the HDD Operator shall operate in a manner that will reduce risk, such as using lower pressure and greater boring depths. The Contingency Plan shall be kept on site at all times. ▪ A non-toxic fluorescent water-soluble dye shall be added to the drilling muds to allow for frac-outs to be seen in muddy waters. The dye shall be used in a concentration which allows the monitors to easily determine the source of the frac-out, and shall be a type of dye approved for use by the local Regional Water Quality Control Board. ▪ All equipment required to contain and clean up a frac-out release shall be available at the work site. ▪ Boring plans should include: <ul style="list-style-type: none"> – A sketch of the construction site, including equipment staging areas, approximate location of drill entry and exit points and the approximate location of access roads in relation to the surrounding area, – Proposed depth of bore and statement of streambed condition (subsurface strata and percent of gravel and cobble) that support the depth of the bore, – Approximate length of bores (50-foot increments), – Type and size of boring equipment to be used (categorized as mini, mid or maxi), – Estimated time to complete bore, – List of lubricants and HDD additives to be used including Material Safety Data Sheets (MSDS), and – Name of Operator's agents and cell phone numbers. ▪ Frac-out prevention and clean-up plans should include: <ul style="list-style-type: none"> – Name(s) and phone numbers of biological monitor(s) and crew supervisor(s), – Site specific resources of concern (if applicable, include factors such as possible presence of sensitive species), – Monitoring protocols (include biological monitoring and frac-out monitoring), and – Containment and clean-up plan (include staging location of vacuum trucks and equipment, equipment list, necessary hose lengths, special measures needed for steep topography, etc. at each location). ▪ If a frac-out or spill occurs in a sensitive resource, the Operator shall immediately notify the CPUC Environmental Monitor. 		

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	<ul style="list-style-type: none"> ▪ If a frac-out occurs, the CPUC Environmental Monitor, in coordination with Siskiyou Telephone’s biological monitor, shall determine whether clean-up actions are warranted. If containment and clean-up is needed to prevent additional impacts, the Contractor shall begin the following containment and clean up measures immediately. Where water flows allow, the Contractor shall immediately construct a sandbag well around the frac-out or place a standing pipe (such as a 55-gallon drum with the top and bottom removed, heavy PVC pipe or CMP or culvert type material) around the frac-out to contain the drilling mud. A trailer-mounted vacuum or vacuum truck shall be deployed to vacuum out spilled drilling fluids that continue to leak. Removed drilling fluids shall not be placed where they are likely to re-enter the stream. All cleanup and containment efforts shall adhere to the Frac-out Contingency Plan approved by the CPUC for spill response. <i>[Supersedes APM BIO-8]</i> 		
Special-Status Wildlife Species	<p>MM B-4: Pre-Construction Surveys and Impact Avoidance Measures for Migratory and Nesting Birds. Siskiyou Telephone shall retain a CPUC-approved, qualified avian biologist to conduct pre-construction surveys and monitor active nests during construction (hereafter referred to as the “authorized biologist”). Surveys for nesting birds shall be conducted prior to any initial ground disturbance that will occur during the breeding period (from January 31 through August 31). The authorized biologist(s) conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques. Qualifications of the biologist(s) shall be submitted to the CPUC for approval. Surveys shall be conducted in accordance with the following guidelines:</p> <ol style="list-style-type: none"> a. Surveys shall cover all potential nesting habitat within disturbance areas and within a 500-foot buffer of these areas. b. Surveys shall be conducted no more than 3 days prior to the start of ground-disturbing activity. c. If active nests are detected during the survey, the authorized biologist shall map each nest and establish a disturbance-free buffer within which no Project activities may occur until the nest fledges or fails, as documented and confirmed by the authorized biologist. The size of the disturbance-free buffer shall be determined by the authorized biologist, and shall depend on the species’ tolerance to human activity, location of the nest relative to the work area, any vegetation or other materials that may screen the nest from noise and view of work, the nature of the work (e.g., heavy equipment use vs. hand tools), and any other pertinent information. Buffer sizes shall be a minimum of 100 feet for non-raptor species and 500 feet for raptors. d. If active nests are observed and the recommended nest avoidance buffer zones are not feasible, non-disturbance buffer zones shall be established by the authorized biologist based on but not limited to consideration of the line of sight from the nest to the worksite, the nesting bird’s behavior, existing and Project-related background disturbance levels, or other biological or physical attributes. Continuous monitoring of the nest site by an authorized biologist shall occur during disturbance activities, and a nest 	<p>Avian biologist resume shall be submitted to the CPUC for review and approval.</p> <p>Ensure surveys and monitoring are conducted in accordance with guidelines outlined in MM B-4.</p>	Prior to and during construction

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	<p>observation log shall be updated once per hour during construction activities. If the monitoring biologist determines nesting may fail as a result of work activities, all work shall cease (except access along existing roadways) within the recommended avoidance area until the biologist determines the adults and young are no longer reliant on the nest site. A site-specific nest protection plan shall be submitted to the CPUC for review and approval if additional nest protection measures are determined necessary by the monitoring biologist.</p> <p>e. Prior to the start of any new Project-related ground disturbance activities, the authorized biologist shall provide the CPUC a report or memorandum describing the findings of the nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); and a list of species observed. If active nests are detected during the surveys, the report shall include descriptions of avoidance zones and methods used to determine avoidance zones and maps or aerial photos identifying nest locations and the boundaries of no-disturbance buffer zones.</p> <p>f. The authorized biologist shall monitor active nests no less than twice per week until nestlings have fledged and dispersed. Activities that might, in the opinion of the authorized biologist, disturb nesting activities shall be prohibited within the buffer zone until such a determination is made.</p> <p>g. Throughout Project construction, nest locations, Project activities in the vicinity of nests, and any adjustments to buffer areas shall be described and reported in monthly monitoring reports to the CPUC.</p> <p>h. If active nests for listed birds are found, a 500-foot buffer will be established around each nest/territory. This buffer may be adjusted in coordination with USFWS, CDFW, and the CPUC. <i>[Supersedes APMs BIO-1]</i></p>		
Special-Status Wildlife Species	<p>MM B-5: Avoid Wildlife Entrapment. To prevent the accidental entrapment of wildlife during construction, all excavated holes or trenches deeper than six (6) inches will be covered at the end of each work day with plywood or similar materials. Larger excavations that cannot easily be covered will be ramped at the end of the work day to allow trapped animals an escape method. Ramps for open excavations will be soil and/or rough plank ramps with a maximum 45-degree angle, and will be installed at intervals prescribed by a qualified biologist. Trenches will be backfilled as soon as possible. Construction personnel will inspect open holes and trenches in the morning and evening for trapped wildlife. In the event that an excavation would be left unattended for a period of more than 24 hours, metal or wooden covering shall be placed over the excavation prior to the departure of the biological monitor in order to completely seal the excavation and prevent longer-term wildlife entrapment, except for larger excavations that cannot easily be covered. Prior to the filling of such excavations, these areas will be thoroughly inspected for special-status species by the qualified biologist. If a trapped animal is observed, construction will cease until the animal has been relocated to an appropriate location. <i>[Supersedes APM BIO-3]</i></p>	Ensure excavated areas are properly backfilled, ramped, and/or covered at the end of each work day	During construction

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Cultural Resources			
APM CUL-1	Prior to construction, workers would be provided with environmental awareness training to recognize potential archaeological or paleontological resources and identify and address any unearthed human remains during construction. If archaeological (or paleontological) materials are uncovered, construction activities and excavation should be conducted to avoid the resources. All construction work within 100 feet of the resource would be halted until a qualified archaeologist (or paleontologist) can assess the find. The archaeologist (or paleontologist) would assess the find and make any necessary recommendations, including any procedures to further investigate or mitigate impacts on the find as required by law, including CEQA Guidelines, Section 15126.4(b)(3)(C).	Review training materials and ensure construction personnel sign an environmental training attendance sheet. Ensure work within 100 feet of the find stops and the find is assessed and treated in accordance with laws.	Prior to and during construction
APM CUL-2	If during excavation or earth-moving activities the construction contractor identifies potential historic or archaeological resources, the county or local jurisdiction would be notified, and a professional archaeologist meeting the minimum qualifications in archaeology as set forth in the Secretary of the Interior's Standards and Guidelines would be contracted and dispatched to assess the nature and significance of the find in the following manner: <ul style="list-style-type: none"> ▪ All excavation and grading within 10 feet of the discovery area would cease immediately. The responding archaeologist may, after analyzing the discovery, authorize an alternate buffer around the materials to ensure adequate evaluation and protection of potential historic and archaeological resource(s) during continued construction operations. ▪ Additional evaluation of the historic and archaeological resource(s) would be conducted and significance of the materials determined. If the discovery is considered significant, the archaeologist would develop and implement a late-discovery mitigation strategy to minimize and avoid the impact, where appropriate. 	Ensure notification occurs, disturbance ceases, and the find is assessed by a qualified archaeologist.	During construction
APM CUL-3	If paleontological resources are discovered during earth-moving activities, the construction crew would immediately cease work near the find. In accordance with Society of Vertebrate Paleontology Guidelines, a qualified paleontologist would assess the nature and importance of the find and recommend appropriate salvage, treatment, and future monitoring and mitigation.	Ensure work ceases near the find and assessment occurs in accordance with Guidelines	During construction
APM CUL-4	If human remains are encountered, Health and Safety Code Section 7050.5 states that no further disturbance would occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The county coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the county coroner would notify the Native American Heritage Commission, which would determine and notify a most likely descendant (MLD). With the permission of the landowner and his/her authorized representative, the MLD may inspect the site of the discovery. The MLD would complete the inspection within 48 hours of the notification by the Native American Heritage Commission. The MLD may make recommendations regarding the disposition of the remains.	Ensure no further disturbance would occur and the find is treated in compliance with State and federal regulations	During construction

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APM CUL-5	Siskiyou Telephone and/or USFS would work with the Karuk Tribe to provide a tribal monitor to observe conditions during construction in specified areas of interest.	Ensure tribal monitor present in specified areas of interest.	During construction
Geology and Soils			
APM GEO-1	Project construction activities would be performed in accordance with the soil erosion and water quality protection measures to be specified in the SWPPP (see Section 4.11.7 of this IS/MND) for the Proposed Project.	Ensure a SWPPP is prepared and implemented to minimize construction impacts on surface water and groundwater quality.	Prior to and during construction
APM GEO-2	Project elements, such as excavating rock or soil for utility box installation, building minor retaining walls (less than 5 feet in height) to avoid sedimentation into roadways, and trenching, would be designed and implemented in accordance with industry standards, including established engineering and construction practices and methods.	Ensure features incorporated into Project design to avoid sedimentation.	Prior to construction
Landslide Impacts	MM GS-1: Conduct geotechnical/geologic surveys for landslides and unstable slopes. The Applicant shall conduct slope stability surveys in areas where Proposed Project components are located on or adjacent to slopes exceeding 20 percent or in areas with previously mapped landslides. These surveys will acquire data that will allow identification of specific areas with the potential for unstable slopes, landslides, rock fall, and debris flows where earthquakes or project excavation could trigger slope failure. The investigations shall include an evaluation of slope conditions, identification of potential landslide hazards, and provide potential modifications to the Project design to avoid areas of unstable slopes and landslide hazards, such as modification of component locations. Where the surveys determine that landslide hazard areas cannot be avoided, best engineering design and construction measures, such as slope protection or controls along the road to divert or catch falling rocks or slides, shall be incorporated into the Project designs and excavation plans to prevent potential damage to project components.	Review slope stability studies and proposed design features and/or construction measures to reduce landslide potential impacts.	Prior to construction
Greenhouse Gas Emissions			
APM GHG-1	To the extent feasible, unnecessary construction vehicle and idling time would be minimized.	Ensure idling is minimized to reduce emissions from construction equipment.	During construction
Hazards and Hazardous Materials			
APM HAZ-1	Refueling of equipment would occur at a minimum distance of 20 feet from all active waterways.	Ensure all refueling occurs at least 20 feet from active waterways.	During construction

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APM HAZ-2	<p>A SWPPP would be in place prior to the start of construction activities to implement BMPs for spill and pollution prevention. The following BMPs would minimize the potential for accidental release of hazardous materials:</p> <ul style="list-style-type: none"> ▪ Equipment would be maintained in good working order, and equipment containing hazardous materials would be inspected periodically for signs of spills or leakage. ▪ Spills that occur would be cleaned up immediately, and any contaminated soil would be containerized and properly disposed of. ▪ Spills that occur would be reported in accordance with applicable federal, state, and local requirements. ▪ Emergency phone numbers would be available onsite. 	Ensure a SWPPP is prepared and BMPs are implemented to minimize the potential for accidental release of hazardous materials.	Prior to and during construction
APM HAZ-3	<p>Siskiyou Telephone would develop a fire management plan, in accordance with the modified special use permit from USFS that addresses construction activities for this project. The fire management plan would establish standards and practices that would minimize the risk of fire danger and, in the case of fire, provide for immediate suppression and notification. The fire management plan would address spark arresters, smoking and fire rules, storage and parking areas, use of gasoline-powered tools, road closures, use of a fire guard, and fire suppression equipment and training requirements. In addition, a water truck would be located onsite (for fugitive dust emission control) and could be used for fire suppression if needed.</p>	Review fire management plan.	Prior to and during construction

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Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
Potential Water Contamination	<p>MM H-1: Prepare and Implement Worker Environmental Awareness Program (WEAP). A project specific WEAP shall be prepared and submitted to the CPUC for approval prior to construction. The WEAP shall include, at a minimum, the following provisions related to hazards and hazardous materials:</p> <ul style="list-style-type: none"> ▪ A presentation shall be prepared by the Applicant and used to train all site personnel prior to the commencement of work. A record of all trained personnel shall be kept. ▪ Instruction on compliance with Proposed Project mitigation measures. ▪ A list of phone numbers of Siskiyou Telephone environmental specialist personnel associated with the Proposed Project (archaeologist, biologist, environmental coordinator, and regional spill response coordinator). ▪ Instruction on the individual responsibilities under the Clean Water Act, the project SWPPP, site-specific BMPs, and the location of Material Safety Data Sheets for the project. ▪ Worker Training on Emergency Release Response Procedures to include hazardous materials handling procedures for reducing the potential for a spill during construction, and hazardous material clean up procedures and training to ensure quick and safe cleanup of accidental spills. ▪ Instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil, groundwater, or surface water contamination. The foreman or regional spill response coordinator shall have authority to stop work at that location and to contact the CUPA (Siskiyou County Environmental Health Division, Hazardous Materials Management; see Section 5.8.1 - Regulatory Background above) immediately if unanticipated visual evidence of potential contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the CUPA or other entities as specified by the CUPA. ▪ Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the Proposed Project. 	WEAP brochure and emergency response procedures to be submitted to the CPUC for review and approval prior to construction.	Prior to and during construction

Potential Water Contamination	<p>MM H-2: Prepare and Implement a Hazardous Materials and Waste Management Plan. Prior to approval of the final construction plans for the Proposed Project, a project-specific Hazardous Materials and Waste Management Plan for the construction phase of the Proposed Project will be prepared and submitted to the CPUC for approval prior to construction. The Plan will be prepared to ensure compliance with all applicable federal, state, and local regulations. The Hazardous Materials and Waste Management Plan will reduce or avoid the use of potentially hazardous materials for the purposes of worker safety, protection from soil, groundwater, and surface water contamination, and proper disposal of hazardous materials. The plan will include the following information related to hazardous materials and waste, as applicable:</p> <ul style="list-style-type: none"> ▪ A list of the hazardous materials that will be present on site and in the local construction yard during construction, including information regarding their storage, use, and transportation; ▪ Any secondary containment and countermeasures that will be required for onsite and construction yard hazardous materials, as well as the required responses for different quantities of potential spills; ▪ A list of spill response materials and the locations of such materials at the Proposed Project site and in the local construction yard during construction. Additionally, the Plan shall designate that spill response materials be kept onsite for all activities performed near to or adjacent to a stream or the river; ▪ Procedure for Fueling and Maintenance of Construction Vehicles and Equipment: Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. The Plan shall include the following procedures: <ul style="list-style-type: none"> – Construction vehicles shall be fueled and maintained offsite at the construction yard or at local fuel stations. Construction vehicles operated near to or adjacent to the stream/river channel shall be inspected and maintained daily to prevent leaks. – Construction equipment such as drill rigs and excavators shall be fueled offsite when feasible. When refueling offsite is not feasible for drilling equipment and other construction equipment onsite refueling of the equipment by refueling vehicles or fuel trucks shall follow specified procedures to prevent leaks or spills. Procedures will require refueling be located a minimum of 150 feet from a stream channel and the use of spill mats, drop cloths made of plastic, drip pans, or trays to be placed under refueling areas to ensure that fuels do not come into contact with the ground. Spill cleanup materials shall be kept readily available on the refueling vehicles. – Drip pans or other collection devices would be placed under equipment, such as motors, pumps, generators, and welders, during operation and at night to capture drips or spills. Equipment would be inspected and maintained daily for potential leakage or failures. ▪ A list of the adequate safety and fire suppression devices for construction activities involving toxic, flammable, or exposure materials; ▪ A description of the waste-specific management and disposal procedures that will be conducted for any hazardous materials that will be used or are discovered during construction of the Proposed Project; and ▪ A description of the waste minimization procedures to be implemented during construction of the Proposed Project. 	Review and approve Hazardous Materials and Waste Management Plan and ensure procedures are implemented during construction.	Prior to and during construction
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Table 6-1. Mitigation Monitoring Plan

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
Potential Soil Contamination	MM H-3: Conduct Sampling and Testing for ADL. Soil along the shoulder of State Highway 96 where project related ground disturbance is to occur, should be sampled and tested prior to construction to determine the proper handling and disposal methods. Caltrans has three Standard Special Provisions with guidelines for handling, reuse, storage, and disposal of ADL contaminated soils that could apply to the Proposed Project (Caltrans, 2014). The appropriate Standard Special Provision (SSP) would be applied for Proposed Project dependent on the ADL concentrations in the soil and planned soil disturbance parameters. The three Caltrans ADL SSPs are: SSP 7-1.02K(6)(j)(iii) (01/18/2013) Earth Material Containing Lead - Requires a lead compliance plan for soil disturbance when lead concentrations are non-hazardous; SSP 14-11.03 (04/19/2013) Material Containing Hazardous Waste Concentrations of Aerially Deposited Lead – ADL management specifications when hazardous waste concentrations exist; and SSP 14-11.04 (01/18/2013) – Minimal Disturbance of Material Containing Hazardous Waste Concentrations of Aerially Deposited Lead - ADL minimal disturbance specifications for use when hazardous waste concentrations exist but material is not being excavated.	Review soil testing results. Ensure that guidelines for handling, reuse, storage, and disposal of ADL contaminated soils are implemented, if required.	Prior to construction
Hydrology and Water Quality			
APM HYDRO-1	Disturbed areas would be restored to preconstruction conditions to avoid altering or increasing the rate or volume of surface runoff.	Ensure restoration of disturbed areas.	Post construction
APM HYDRO-2	To comply with the LUP General Permit, Siskiyou Telephone would submit a Notice of Intent to the SWRCB and a Linear Construction Activity Notification to the RWQCB prior to construction. Siskiyou Telephone would also have the construction contractor prepare an SWPPP outlining BMPs for storm water erosion and sediment control, wind erosion control, source controls, and waste management. Siskiyou Telephone would ensure that SWPPP requirements are implemented and water quality standards are maintained. BMPs would be modified as necessary to ensure adequate erosion controls. The following are examples of BMPs: <ul style="list-style-type: none"> ▪ Dry-season (April through October) construction to minimize erosion and storm water sediment transport ▪ Use of silt fences or fiber rolls to prevent the migration of sediment offsite ▪ Application of water to disturbed areas during work or windy conditions to prevent dust and erosion ▪ Use of drip pans for mobile fueling 	Ensure a SWPPP is prepared and BMPs are implemented to minimize construction impacts on surface water and groundwater quality.	Prior to and during construction
Land Use and Planning			
APM LU-1	Siskiyou Telephone would obtain permits to construct from USFS, Caltrans, and the CPUC.	Ensure permits are received prior to construction	Prior to construction

Table 6-1. Mitigation Monitoring Plan

Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Timing of Action
Noise			
APM NOI-1	<p>During construction of the proposed project, the following BMPs would be implemented to minimize noise impacts:</p> <ul style="list-style-type: none"> ▪ Construction activity would be restricted to the hours between 7 a.m. and 7 p.m. on weekdays. Work on weekends would need to be coordinated with the Siskiyou County Planning Department as needed. ▪ All stationary noise-generating equipment would be located as far as possible from nearby noise-sensitive receptors. ▪ Construction equipment powered by gasoline or diesel engines would have sound control devices at least as effective as those provided by the original equipment manufacturer. No equipment would be allowed to have an un-muffled exhaust, as appropriate. ▪ The construction contractor would ensure that noise-generating mobile equipment and machinery are turned off when not in use. 	<p>Ensure activities limited to specified hours. Review notification (if weekend work is necessary). Ensure BMPs implementation during construction such that construction noise is minimized and noise-related complaints from nearby sensitive receptors are minimized.</p>	<p>During construction</p>
Public Services			
APM PS-1	<p>Construction schedules would be submitted to local emergency service providers for review and comment, and updated as necessary. In addition, fire extinguishers and shovels would be maintained onsite during periods of construction or site activity for immediate fire control, if needed.</p>	<p>Review correspondences with local emergency service providers and ensure fire extinguishers and shovels are maintained onsite.</p>	<p>Prior to and during construction</p>
Transportation and Traffic			
APM TRF-1	<p>The use of traffic control measures would ensure that the effects on traffic would not create unsafe conditions. In addition, Siskiyou Telephone would inform residents in Happy Camp of construction activities and potential delays.</p>	<p>Review and ensure implementation of traffic control measures in accordance with Caltrans requirements.</p>	<p>Prior to and during construction</p>
Utilities and Service Systems			
APM UTL-1	<p>Solid waste generated in the project area during construction is anticipated to be minimal and would be transported offsite daily to the Happy Camp disposal site.</p>	<p>Ensure solid waste is transported offsite daily.</p>	<p>During construction</p>

Note: Applicant Proposed Measures (APMs) appear in the Proponent's Environmental Assessment (Siskiyou Telephone, 2016 and 2018).