

# 1. Introduction

## 1.1 Project Overview

The Siskiyou Telephone Happy Camp Somes Bar Fiber Connectivity Project (Project) Grant Funding Application (Application No. U-1017-C) involves the construction, installation, operation, and maintenance of a new fiber optic broadband facility cable within a conduit for approximately 17 miles within or adjacent to State Highway 96 (Caltrans right-of-way), in both the Klamath National Forest and Six Rivers National Forest (see figures in Attachment A). The project is being constructed under a grant from the California Advanced Service Grant Program, as funded by the California Public Utilities Commission (CPUC) to Siskiyou Telephone Company. The purpose of the Project is to provide reliable telephone and broadband service capability to existing and future residences in the area between Clear Creek and Ti Bar and remote areas of Siskiyou County, and to complete a continuous fiber optic route between Interstate 5 and U.S. Highway 101.

## Project Components

The Proposed Project consists of two components: fiber optic broadband facility cable and utility box installation. The locations of the project components are shown in detail on in Appendix B. The project would consist of all new construction because no existing project components are located in the project area.

### Fiber Optic Broadband Facility Cable

An estimated 88,282 feet of underground fiber optic broadband facility cable, including drops to subscribers, are proposed to be installed in conduit along the cable alignment. The telephone service cable would be made of fiber optic service line that would be placed in a 1.5-inch high-density polyethylene conduit. The fiber optic broadband facility cable would be installed using both directional boring and trenching.

Trenching would occur only where the shoulder width can accommodate the operation without damaging the road surface or shoulder, and where boring cannot be done. In general, the cable would be installed in the far side of the road from the Klamath River, except for short segments where there is not adequate space in the shoulder.

### Utility Boxes

Forty concrete hand hole utility boxes are proposed to be installed as access points for subscriber drop, splice points, and grounding locations (see diagram in Figure 4-3). The opening of the hand hole boxes would be at ground surface elevation and would be approximately 6 feet 7 inches long by 3 feet 1 inch wide by 4 feet deep with a traffic-rated lid. Boxes would be placed along the fiber optic broadband facility cable route at 2,500-foot minimum spacing to provide rural utilities service grounding. Additional boxes would also be placed as needed along the route to provide access points for each residential subscriber, or fiber optic line splices.

Locations along the cable alignment could require digging out of the rocky bank to create a clearing large enough that the box can be opened and closed easily. In areas where digging the bank would be required, the bank would be less than 5 feet high. If needed, a rock retaining wall would be built around the cutout to support any loose impediments such as rocks and debris that might fall on the box or into the roadway.

## Right-of-Way Requirements

The Proposed Project would be constructed within and adjacent to State Highway 96 ROW in Siskiyou County, which is maintained by Caltrans. A minimum construction access width of 10 feet would be required for trench or plow excavation. All construction equipment would remain within existing roadways or road shoulders.

For more detailed information regarding project construction, see the Final Mitigated Negative Declaration (Aspen 2018).

## 1.2 Authority

The California Public Utilities Commission (CPUC) has broad regulatory authority under Article XII of the California Constitution, and Section 702 of the Public Utilities Code (PU Code) mandates that every public utility obey and comply with every order, decision, direction or rule made by the Commission. Public utilities are subject to enforcement action and fines pursuant to PU Code Sections 2102-1015, 2017, 2108, and 2114. In 2013, the CPUC established a CEQA Citation Program authorizing Staff to fine public utilities for non-compliance with Permits to Construct (PTCs) and Certificates of Public Convenience and Necessity (CPCNs). MMCRPs are adopted as part of PTCs and CPCNs and are enforced as such.

Monitoring of mitigation measures to be implemented by a project is required by the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15097 clarifies requirements for mitigation monitoring or reporting. As well, Section 21081.6 of the California Public Resources Code (PRC) requires a public agency to adopt a mitigation monitoring and reporting program when it approves a project that is subject to preparation of an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) and where significant adverse environmental effects have been identified.

Mitigation measures to be implemented as part of the Project were identified in the Final MND prepared by CPUC for the Project. The MND was adopted by the California Public Utilities Commission (CPUC) on August 9, 2018 in Resolution T-17623 and includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with the mitigation measures approved in the MND. In addition, Applicant Proposed Measures (APMs) were adopted as part of the MND. Together, the mitigation measures and APMs identified in the MND provide the framework for this MMCRP.

## 1.3 Mitigation Monitoring Compliance, and Reporting Plan

Within Siskiyou Telephone Company's application, the utility proposed APMs to reduce potentially significant adverse impacts related to project construction and operation. In addition, mitigation measures are imposed on the Project by the CPUC, and regulatory agencies may impose permit requirements.

The MMCRP provides guidelines and procedures for environmental compliance on the Project. The MMCRP was developed by the CPUC in coordination with Siskiyou Telephone Company and CPUC's Environmental Monitors (CPUC EMs). The MMCRP defines reporting relationships, provides information regarding the roles and responsibilities of the Project's environmental compliance personnel, sets out compliance reporting procedures, and establishes a communication protocol. The communication information listed in the MMCRP will be updated throughout construction.

The purpose of this MMCRP is to ensure effective implementation of the mitigation measures and APMs identified in the MND and imposed by the CPUC as part of project approval. It describes the logistics of the

monitoring process and establishes protocols to be followed by CPUC’s third-party Environmental Monitors and Siskiyou Telephone Company project staff. This MMCRP includes:

- Procedures for approving minor project changes;
- Procedures for dispute resolution;
- APMs and mitigation measures that Siskiyou Telephone Company must implement as part of the Project;
- Actions required to implement these measures;
- Monitoring requirements; and
- Timing of implementation for each measure.

Section 6 lists the APMs and mitigation measures, the timing for completion, and whether CPUC review or approval is required before construction can commence.

A draft version of the MMCRP was distributed to Siskiyou Telephone Company and CPUC EMs for review and comment. The final language of the MMCRP was established in consultation with Siskiyou Telephone Company.

## 1.4 Agencies with Jurisdiction

The CPUC is the Lead Agency for the Project. However, the project route affects resources or requires activities that are under the jurisdiction of or regulated by other agencies. These agencies that may require separate permits or approvals are listed in Table 1. Contact information for individual agencies is provided in Table 2.

All required permits are to be secured by Siskiyou Telephone Company. CPUC’s EM will be provided copies of every permit secured and will include permit compliance as part of general environmental monitoring duties. If the CPUC EM observes activities or conditions believed to be in violation of a permit, the CPUC EM has the authority to communicate these observations to the appropriate agency. Under their own authority and at their discretion, permitting agencies may implement their own monitoring and reporting schemes and undertake whatever enforcement actions they are authorized to pursue.

**Important:** The status of required permits will be included in any request by Siskiyou Telephone Company for a Notice to Proceed from the CPUC. Copies of permits, including any permit requirements and stipulations, shall be provided to CPUC.

**Table 1. Permits that May Be Required for the Siskiyou Telephone Happy Camp to Somes Bar Fiber Connectivity Project**

Agency	Jurisdiction	Requirements
<b>FEDERAL/STATE AGENCIES</b>		
U.S. Forest Service	Special Use Authorization	National Environmental Policy Act (NEPA) and a special use permit for construction
California Department of Fish and Wildlife (CDFW)	Manage fish, wildlife, plant resources and habitats; California ESA, California Native Plant Protection Act, California Fish and Game Code Section 1600-1616 (streams and riparian zones)	Lake and Streambed Alteration Agreement (LSAA; 1602 Permit)

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<b>Agency</b>	<b>Jurisdiction</b>	<b>Requirements</b>
California Department of Transportation (Caltrans)	Highway 96	Encroachment Permit
State Water Resources Control Board (SWRCB) – Division of Water Quality	Waters of the state, Clean Water Act	National Pollution Discharge Elimination System (NPDES) General Permit for Disturbance Associated with Construction and Land Activities
California Office of Historic Preservation	Cultural and Tribal Resources	Contact the State Historic Preservation Officer in the case of an unanticipated discovery
<b>LOCAL/REGIONAL AGENCIES</b>		
Regional Water Quality Control Board (RWQCB) – North Coast Region (Region 1)	National Pollution Discharge Elimination System, General Construction Storm Water Pollution Prevention Plan (SWPPP)	Submittal of Notice of Intent (NOI) to Regional Board to comply with terms of the general permit and preparation of SWPPP
Siskiyou County Air Pollution Control District (APCD)	Asbestos Airborne Toxic Control Measures (ATCM) for construction	Obtain approval of a dust mitigation plan for naturally-occurring asbestos.

**Table 2. Jurisdictional Agencies Associated with the Siskiyou Happy Camp Somes Bar Fiber Connectivity Project**

Agency	Address	Contact Person	Phone	E-mail Address
<b>LEAD STATE AGENCY</b>				
California Public Utilities Commission	505 Van Ness Avenue, 3rd Floor San Francisco, CA 94102	Jensen Uchida	415-703-5484	<a href="mailto:Jensen.Uchida@cpuc.ca.gov">Jensen.Uchida@cpuc.ca.gov</a>
<b>LEAD FEDERAL AGENCY</b>				
U.S. Forest Service	63822 Hwy 96 Happy Camp, CA 96039	Alonzo "AJ" Jackson	530-493-1768	alonzojackson@fs.fed.us
<b>STATE AGENCIES</b>				
California Department of Fish and Wildlife	601 Locust Street Redding, CA 96001	Kristin Hubbard	530-225-2138	<a href="mailto:kristin.hubbard@wildlife.ca.gov">kristin.hubbard@wildlife.ca.gov</a>
California Department of Transportation (Caltrans)	District 2	Chris Gaido	530-949-0918	<a href="mailto:Chris.gaido@dot.ca.gov">Chris.gaido@dot.ca.gov</a>
State Water Resources Control Board (SWRCB) – Division of Water Quality	P.O. Box 100 Sacramento, CA 95812-0100	N/A	916-341-5455	<a href="mailto:stormwater@waterboards.ca.gov">stormwater@waterboards.ca.gov</a>
California Office of Historic Preservation	1725 23rd Street, Suite 100 Sacramento, CA 95816	Julianne Polanco State Historic Preservation Officer (SHPO)	916-445-7000	<a href="mailto:julianne.polanco@parks.ca.gov">julianne.polanco@parks.ca.gov</a>
<b>LOCAL AND REGIONAL</b>				
Regional Water Quality Control Board (RWQCB) – Region 1 North Coast	5550 Skylane Blvd., Suite A Santa Rosa, CA 95403	Devon Jorgenson	707-576-2701	Devon.jorgenson@waterboards.ca.gov
Siskiyou County Air Pollution Control District (APCD)	525 South Foothill Dr. Yreka, CA 96097	Kimberly Sumner	530-841-4030	<a href="mailto:ksumner@co.siskiyou.ca.us">ksumner@co.siskiyou.ca.us</a>

## 1.5 Schedule

Siskiyou Telephone Company expects the Happy Camp Somes Bar Fiber Connectivity Project to be in service by October, 2020. Table 3 shows a preliminary construction schedule for key aspects of the Project: installation of the fiber in the Klamath National Forest; and installation of the fiber in the Six Rivers National Forest. The schedule is based on initial conceptual engineering. The actual construction schedule may vary based upon many factors, including the timeline for additional agency approvals, materials acquisition, environmental conditions, and any necessary changes to project design due to unexpected physical conditions.

**Important:** Except for such pre-construction activities as engineering, design, studies, and permitting, Project-related construction activities will not begin until the CPUC’s Project Manager has issued one or more Notices to Proceed covering the planned activities.

**Table 3. Preliminary Construction Schedule**

	Sep 2018	Oct	Nov	Dec	Jan 2019	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan 2020	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Klamath National Forest							X	X	X	X	X	X	X	X	X										
Six Rivers National Forest													X	X	X				X	X	X	X	X	X	X
In-Service Date																									X

### 1.5.1 Construction Work Packages

The Project has been divided into two construction work packages, as listed in Table 4. Anticipated start dates for the work packages are shown. Depending on how it organizes and executes its work, Siskiyou Telephone Company may ultimately use fewer or more work packages.

**Table 4. Construction Packages**

Work Package	Description	Location	Begin Date
1. Klamath National Forest	Installation of fiber line	Hwy 96 within the Klamath National Forest	October 2018
2. Six Rivers National Forest	Installation of fiber line	Hwy 96 within the Six Rivers National Forest	September 2019

**Important:** Before work can proceed on a work package, a request for a Notice to Proceed (NTP) must be made by Siskiyou Telephone Company and approved by CPUC (see Section 4.1.1). The mitigation measures and APMs listed in Section 6 include the locations where these requirements apply and identifies what must be implemented prior to the commencement of construction. Siskiyou Telephone Company will work closely with its construction contractor to ensure that site-specific mitigation measures and APMs are clearly identified and implemented. CPUC EMs and Siskiyou Telephone Company’s Environmental Compliance Supervisor will verify the implementation of mitigation measures and APMs prior to and during construction.

## 2. Roles and Responsibilities

### 2.1 Implementation

Siskiyou Telephone Company is responsible for implementing and maintaining all mitigation measures and APMs, and for obtaining and complying with all required permits and their requirements. The utility is responsible for ensuring that its agents and contractors comply with the MMCRP. Siskiyou Telephone Company also is responsible for satisfying requests from jurisdictional agencies and will notify and copy the CPUC on all correspondences related to final approvals and verifications for the project if not otherwise copied on the correspondence.

Standards for successful mitigation are implicit in some mitigation measures, such as obtaining non-discretionary permits or avoiding a specific impact entirely. Additional resource avoidance or impact minimization conditions may be imposed by applicable agencies with jurisdiction through their discretionary permit processes.

**Important:** Siskiyou Telephone Company will inform the CPUC Project Manager in writing of mitigation measures or APMs that are not or cannot be successfully implemented. While the CPUC recognizes the need for flexibility post-decision in response to changed circumstances, it believes changes should be the exception, and it intends to ensure that any proposed change is subject to rigorous standards. Consequently, some requested changes may qualify for the process set forth in the MMCRP for minor project changes (see 4.3.3) while others may require the submittal of a Petition for Modification (PFM) pursuant to CPUC Rules of Practice & Procedure, Rule 16.4(a).

The CPUC, as Lead Agency, is responsible for ensuring that all mitigation measures and APMs are implemented in a timely fashion as specified, and that the CPUC EM verifies Siskiyou Telephone Company's compliance with mitigation measures, APMs, and conditions of permits issued by other agencies. Similarly, Siskiyou Telephone Company will construct the project in accordance and in compliance with all mitigation measures. Other jurisdictional agency representatives may visit construction areas at any reasonable and safe time, and may require information regarding the status of compliance with particular mitigation measures or permits. Additional information on communication protocols is presented in Section 3.

### 2.2 Siskiyou Telephone Company Roles and Responsibilities

Siskiyou Telephone Company project personnel and Siskiyou Telephone Company's contractors are responsible for implementing all project mitigation measures, APMs, permit conditions, and the MMCRP. It is Siskiyou Telephone Company's responsibility to comply with project requirements, plan construction activities in a manner that meets these requirements, document compliance activities and the results of mitigation, and implement the MMCRP. In addition to this MMCRP, Siskiyou Telephone Company will implement its own Environmental Compliance and Management Program (ECMP) that will be specifically tailored to the project and designed to work concurrently with this MMCRP.

#### **Siskiyou Telephone Company Environmental Compliance Lead**

The Siskiyou Telephone Company Environmental Compliance Lead shall be the lead Siskiyou Telephone Company representative responsible for implementing environmental requirements and the MMCRP. The Siskiyou Telephone Company Environmental Compliance Lead's (Project Manager will fill this position) responsibilities include:

- Understanding and planning for project requirements and construction needs
- Coordinating and completing preconstruction requirements included in project mitigation measures, APMs, permit conditions, and the MMCRP
- Communicating environmental requirements to the Siskiyou Telephone Company Compliance Team and Construction Managers
- Communicating with the CPUC Monitoring Team regarding environmental requirements, construction needs, and construction schedule changes
- Ensuring compliance with project mitigation measures, APMs, permit conditions, and the MMCRP
- Reporting the effectiveness of mitigation and regularly submitting required documentation and notifications to CPUC
- Providing leadership to correct any issues with environmental compliance

### **Siskiyou Telephone Company Subject Matter Experts**

#### **Staff Members and Phone Contacts**

Carl Eastlick, Project Manager, 530-598-1617 cell, 530-467-6151 office

Tyler Eastlick, Construction Inspector, 530-598-4070 cell

Bob Thomas, Henkels & McCoy, Supervisor, 530-598-9015 cell

Pat Agee, Henkels & McCoy, Supervisor, 541-968-6542 cell

Dennis Donahue, Karuk Tribal Monitor

Heather Waldrop CH2M Hill, Project Manager, 530-917-9329 cell

Dan Weinberg, CH2M Hill, Lead Biologist, 510-816-3951

Scott Demers, CH2M Hill, Lead Avian Biologist, 707-298-9898

Stacy Bumback, CH2M Hill, Lead Archeologist, 206-910-9845

The Siskiyou Telephone Company's Subject Matter Experts' responsibilities include:

- Understanding and planning for technical requirements of the MMCRP and mitigation measures
- Conducting, or overseeing, monitoring activities specified in project mitigation measures, APMs, and permit conditions
- Ensuring projects follow appropriate technical protocols for their technical discipline
- Providing technical input to facilitate resolutions of unanticipated occurrences related to their technical discipline
- Directing lead and specialty monitors working on technical disciplines
- Communicating with the CPUC Monitoring Team regarding technical environmental requirements
- Communicating with resource agencies on technical disciplines

### **Environmental Inspector - CH2M Hill Staff on Project**

The EI is a Siskiyou Telephone Company or contracted position that shall work closely with construction personnel in the field to ensure implementation of mitigation measures and perform, or oversee, required monitoring tasks. The EI shall be the primary field employee responsible for verifying and communicating day-to-day environmental compliance. Multiple EIs may be used by Siskiyou Telephone Company as needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The EI's responsibilities include:



- Understanding and communicating environmental project requirements and construction needs to construction personnel
- Supporting construction staff to ensure work is conducted in compliance with environmental requirements
- Monitoring activities specified in project mitigation measures, APMs, and permit conditions
- Conducting pre-construction surveys or required activities as specified in the MMCRP
- Implementing the MMCRP
- Determining the effectiveness of the project's mitigation measures in the field and reporting whether to the Siskiyou Telephone Company Compliance Team any recommendations

The EI has the authority to redirect any construction activities associated with the project, when it is safe to do so, if the activity poses an imminent safety threat or puts a sensitive resource at risk beyond what is already permitted.

### **Specialty Monitors**

CH2M Hill will have Biologist on site daily and coordinate with Construction and Telephone Staff as needed.

### **Construction Managers**

Siskiyou Telephone Company Project Manager and Construction Inspector provide support to the Siskiyou Telephone Company Project Manager and oversee the activities of construction personnel. The Siskiyou Telephone Company Construction Managers shall be based out of Siskiyou Telephone Company's offices, but may also be available in the field on a daily basis. Construction Manager responsibilities include:

- Ensuring compliance with Siskiyou Telephone Company specifications, project mitigation measures, APMs, permit conditions, MMCRP policies, construction contracts, and applicable codes
- Communicating construction needs and schedule changes to the Siskiyou Telephone Company Compliance Team
- Regularly facilitating field meetings with construction and environmental staff

### **Construction Workers**

Construction workers who enter the project site are responsible for following all mitigation measures and APM requirements, permit conditions, and the MMCRP. Construction workers are responsible for attending required environmental training(s) applicable to their position, and directing any questions to the Siskiyou Telephone Company Construction Managers, Siskiyou Telephone Company Construction Leads, and/or EIs.

### **Subcontractors**

Siskiyou Telephone Company may elect to use subcontracted construction crews on the project. Under the direction of Siskiyou Telephone Company, subcontracted construction crews are responsible for complying with mitigation measures and APM requirements, permit conditions, and the MMCRP.

## 2.3 California Public Utilities Commission

### 2.3.1 CPUC Project Manager

The CPUC PM has overall responsibility for ensuring that mitigation measures and APMs are implemented as adopted by the CPUC. The CPUC PM will determine the effectiveness of the MMCRP based on the implementation of the measures included in the mitigation monitoring table in Section 6. The CPUC delegates field monitoring and reporting responsibilities to its third-party EMs during construction and will oversee their work through telephone calls and review of daily and weekly status reports. The CPUC PM will be notified of all noncompliance situations and may suggest measures to help resolve issue(s).

**Important:** The CPUC PM will issue NTPs for construction of each work package identified by Siskiyou Telephone Company. However, the CPUC's NTP does not authorize construction to start if additional approvals are required and pending from other agencies and such approvals have not been obtained at the time of issuance of an NTP. *No construction may occur when other agency approvals are pending without specific approval by those agencies.*

### 2.3.2 CPUC Environmental Monitor (Aspen)

Siskiyou Telephone Company has primary responsibility for ensuring that construction activities are conducted in accordance with approved Project mitigation measures, APMs, compliance plans, and permit conditions.

The overall monitoring program will be administered under the direction and oversight of the CPUC PM. The CPUC will delegate daily or weekly monitoring and reporting responsibilities to a third-party monitor (Aspen). The role of the CPUC third party monitor (Aspen) is to ensure that compliance is being achieved and to document compliance using verbal and written communications. The number of third-party monitors (CPUC EMs) and the frequency of site inspections will depend on the number of concurrent construction activities and their locations with respect to sensitive resources and land uses.

- **Aspen Monitoring Manager.** The Monitoring Manager supervises Aspen's CPUC EMs, determines the appropriate inspection frequency, and is responsible for monitoring report preparation. The Monitoring Manager also serves as the main point of contact with the CPUC PM for major compliance matters. The Monitoring Manager will be supported by the MND Manager if the need arises.
- **Aspen CPUC Environmental Monitors (CPUC EMs).** CPUC EMs will conduct the day-to-day monitoring and be the primary point of contact with in-field agency and project personnel. CPUC EMs will be an integral part of the project team and will stay apprised of construction activities and schedule changes, and will monitor construction activities for compliance with project mitigation measures, APMs, compliance plans, and permit conditions. The CPUC EMs will document compliance through daily logs and provide input for the monitoring reports. The CPUC EMs shall note any issues or problems with implementation of mitigation/APM/permit conditions, notify the appropriate designated project members, and report problems to the CPUC PM. All other issues will be brought to the attention of the Siskiyou Telephone Company's field representative to address appropriately.

**Important:** The enforcement authority of the CPUC EM in the field is limited to conditions posing imminent safety or resource endangerment concerns at a work location. The CPUC EM is authorized to temporarily stop work under these conditions if it is safe to do so. Siskiyou Telephone Company will address the identified issues. Only the CPUC PM has authority to shut down the project completely.

## 3. Communication

Good communication is essential to successful implementation of an environmental mitigation compliance program. To avoid Project delays, CPUC and Siskiyou Telephone Company environmental and construction representatives will interact regularly and maintain professional, responsive communications at all times. Siskiyou Telephone Company representatives will coordinate closely with CPUC EMs throughout the monitoring effort to ensure that issues are addressed and resolved in a timely manner. To that end, this section provides a communication protocol for the timely and accurate dissemination of information to all levels of the Project regarding surveys, plans, mitigation measures, construction activities, and planned or upcoming work.

### 3.1 Communication Protocol

To ensure that the CPUC EMs can get accurate information on ongoing surveys, construction work, and schedules, the following protocols have been established:

- The CPUC EMs' primary point of contact will be the EI. If not available, the Environmental Compliance Supervisor will be the point of contact. If issues arise and cannot be resolved at this level, the issue will be elevated to the CPUC EM Project Manager/Environmental Compliance Lead via e-mail or telephone.
- The EI or Environmental Compliance Supervisor will inform CPUC EMs of all current and planned survey and construction activities, including status of permits and activity locations, in a timely manner. Timely notification must be sufficient to allow response time for CPUC monitors to be present for that activity.
- The CPUC EM and other designated agency representatives or staff may talk to anyone on the construction site to ask questions about their activity, but the construction personnel may opt to refer the CPUC EM to the EI or other designated person. The EIs are the appropriate contacts for obtaining information on construction activity schedules or construction practices.
- Siskiyou Telephone Company will provide to the CPUC EM a list of all construction monitoring personnel and managers, identified by work package or component, title, and contact information. An updated list will be distributed as needed to keep all parties informed of monitor and staff additions/changes, as well as construction scheduling changes. This list of personnel, subsequent updates, and construction schedule changes will be distributed to all persons on the list throughout the construction process.
- The CPUC EM will continue to report compliance concerns first to the EI and give them time to resolve compliance issues. If this includes discussions with resource agencies, documentation of such communication and any subsequent actions to be undertaken to achieve compliance will be provided to the CPUC EM. If the concern involves a permit, because Siskiyou Telephone Company is the permit holder with jurisdictional agencies, the Environmental Compliance Lead will consult with the applicable resource agencies. If the CPUC EM has an ongoing unresolved concern about a mitigation measure that could affect a permit condition or could result in resource endangerment, the Environmental Compliance Lead will contact the appropriate resource agency to discuss the issue. The Environmental Compliance Supervisor will take the lead in the coordination effort and in resolving the issue.
- The resource agencies will be notified immediately (within 24 hours) by the Environmental Compliance Lead of any substantive non-compliance issues regarding resources under their jurisdiction and of any actions taken to resolve the issue, consistent with permit requirements. In addition, the CPUC EM will receive immediate notification of these communications if not already aware of the issue and action.
- Prior to or subsequent to agency notification, the Environmental Compliance Lead, assisted by the Environmental Compliance Supervisor and Siskiyou Telephone Company's Subject Matter Experts, will

develop a plan to resolve the issue and will follow up with the respective agencies to explain the strategy and receive agency approval.

- Siskiyou Telephone Company will expeditiously provide verbal notification and/or submit a preliminary electronic notification of a suspected non-compliance event, followed by a timely submittal of a final notification that more fully characterizes the event, actions, and outcomes.
- If a “take” of a biological resource is imminent or if there is a danger/hazard to a special status biological resource, the CPUC EM can request that work be stopped in that area immediately (as long as it can be done safely); this request should be made to the EI or senior Siskiyou Telephone Company person on site. At any time, anyone can order an activity to be halted temporarily if a take or a hazard is imminent.
- Conference calls will take place on an as needed bases and may be weekly, bi-weekly, or monthly, depending upon construction activities, and include a discussion of construction and compliance activities between the CPUC EM and Environmental Compliance Supervisor, with additional Siskiyou Telephone Company environmental staff and agency staff participating as determined appropriate.

### **3.2 Pre-Construction Compliance Coordination**

Prior to construction, Siskiyou Telephone Company is required by the terms of some project mitigation measures and APMs and in some cases by permitting requirements of other agencies, to prepare various plans and obtain approval of these plans, in addition to performing surveys. During the pre-construction period, Siskiyou Telephone Company will conduct meetings, conference calls, and site visits with the CPUC, technical representatives of the CPUC third-party monitor, and other agencies. The purpose of the pre-construction compliance coordination process is to:

- Discuss and document the status of all required Siskiyou Telephone Company’s submittals,
- Document the findings of data reviews and jurisdictional agency approvals,
- Review Siskiyou Telephone Company’s submittals,
- Document the status of mitigation measures/APMs as they apply to the Project or work packages, and
- Discuss refinements or minor changes to the Project.

The goal of the pre-construction process is to complete all required actions so the CPUC and other agencies, as appropriate, can issue NTP authorizations for each Project work package.

Other pre-construction activities include the following:

- Inclusion of mitigation requirements in contract designs, instructions, and specifications
- Field verification of work locations to confirm any need for siting adjustments based on the presence of sensitive resources
- Field verification of any construction yard sites

A pre-construction meeting conference call took place on August 27, 2018 with the CPUC, Siskiyou Telephone Company, and CPUC EMs to review the MMP and preconstruction requirements.

### **3.3 Coordination during Construction**

Many mitigation measures were derived from specific permit conditions or agency input. If an issue arises during construction that requires resource agency coordination, the EI will immediately contact the CPUC EM, Environmental Compliance Supervisor, Siskiyou Telephone Company’s Environmental Compliance Lead and Subject Matter Expert. Siskiyou Telephone Company will be responsible for contacting resource agencies and immediately notifying them of noncompliance issues arising with regard to matters under their jurisdiction. CPUC shall be copied on all correspondence (email or letter) and provided copies of

documentation that flow between Siskiyou Telephone Company and resource agencies. If an unresolved issue regarding compliance with a mitigation measure affects a permit requirement under the jurisdiction of a resource agency, the CPUC EM will notify the EI or Siskiyou Telephone Company's team, and the Environmental Compliance Lead will coordinate with the agency to resolve any issues. Ongoing consultation and results will be included in Siskiyou Telephone Company's weekly report.

### 3.4 Daily Communication

Generally, problems encountered during construction can be resolved in the field through regular communication among the EI, construction contractors, and CPUC EMs. Due to limited cell service in the area, Siskiyou Telephone Company will provide two-way radios for Biological Monitors, Project Inspectors, Drill Operators and CPUC EMs for job site communication. The Project Inspector will have access to long range radio to communicate any emergency to Etna Control Center for emergency issues. The Project contact list will be provided and updated as needed by Siskiyou Telephone Company.

#### 3.4.1 CPUC EMs

The CPUC EM's primary point of contact in the field is the EI. The CPUC EM will contact the EI if an activity is observed that conflicts with one or more of the mitigation measures, APMs, or permit conditions, so that the situation can be corrected by Siskiyou Telephone Company. If the CPUC EM cannot immediately reach the EI, the Environmental Compliance Supervisor will be contacted to address the issue. Similarly, the CPUC EM will contact the EI for information on where construction crews are working, the status of mitigation measures, and for schedule forecasts. The CPUC EM may discuss construction procedures directly with the construction contractors; however, Siskiyou Telephone Company may require its construction contractors to defer questions to an onsite Siskiyou Telephone Company representative. In all cases, the CPUC EM will contact the designated Siskiyou Telephone Company representative if a problem is noted that requires action from the construction contractor or Siskiyou Telephone Company.

**Important:** The CPUC EM will not direct the construction contractor, but will contact the designated Siskiyou Telephone Company contact person. In the event an activity imposes an imminent threat to a sensitive resource or an undue risk, the CPUC EM will try to contact the EI, who has the authority to stop work; however, if they are not immediately available, the CPUC EM has the authority to stop work at that location if it is safe to do so.

#### 3.4.2 Siskiyou Telephone Company

Siskiyou Telephone Company will provide the CPUC and the CPUC monitoring team with a contact list identifying construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title and responsibility, including the names of Siskiyou Telephone Company and CPUC EMs, project managers, supervisory staff, and other members of the team. The list shall include phone numbers and e-mail addresses where team members can be reached during construction. The contact list will be updated and redistributed as necessary by Siskiyou Telephone Company as new personnel are assigned to the Project. This list is confidential and will not be published or put on the CPUC project website.

Siskiyou Telephone Company and/or its contractors will hold daily onsite meetings that the EI will attend. Prior to beginning the day's work at a job site, a tail-board briefing will be held by Siskiyou Telephone Company and/or its contractor. Possible subjects include reemphasizing safety and identifying any specific safety concerns associated with that day's operation, potential environmental issues that workers should be aware of, etc.

## **3.5 Scheduled Communications**

### **3.5.1 Siskiyou Telephone Company Compliance Report**

Siskiyou Telephone Company will prepare and distribute a weekly environmental compliance status report for distribution to key team members, including the CPUC. The CPUC EM will review the weekly report to ensure that the status of mitigation measures, APMs, and permit conditions is consistent with observations in the field. Questions regarding the status of mitigation measures will be directed to the Environmental Compliance Supervisor. The weekly environmental compliance status report also will be a tool to keep all parties informed of construction progress and schedule changes.

### **3.5.2 Scheduled Progress Meetings**

Siskiyou Telephone Company will conduct weekly field meetings with construction managers, supervisors, Siskiyou Telephone Company's environmental representatives, and other appropriate staff to discuss work completed, work anticipated for the following period, and the status of mitigation measures. The weekly field meetings also will provide a forum for discussing environmental compliance issues or concerns.

Siskiyou Telephone Company may request that CPUC EMs (and other agency EMs) participate in the field meetings to help resolve any issues that may have arisen during the previous period and to anticipate potential issues that may arise during upcoming activities. Alternatively, the Environmental Compliance Lead or the CPUC's EMs may recommend a separate meeting to discuss mitigation, project change requests, or other Project-related issues. These meetings may be held at a designated office location or on the Project site.

### **3.5.3 Scheduled Conference Call**

The Environmental Compliance Lead, Environmental Compliance Supervisor, SME, CPUC PM, the CPUC EM, and other parties may participate in teleconference calls as needed. The teleconference calls will be scheduled for an agreed date and time and will be used to identify actual or potential issues and discuss solutions. The teleconference calls can be requested by the CPUC, Siskiyou Telephone Company, or Aspen. The conference calls will focus on the Mitigation Monitoring Program and project progress generally.

## **3.6 As-needed Interagency Conference Calls**

From time to time during the pre-construction process or during construction, the CPUC, resource agencies, and/or Siskiyou Telephone Company may determine that conference calls may be necessary or appropriate to discuss the status of specific mitigation compliance as they relate to permit requirements. These calls will be scheduled in advance, to the extent feasible, by e-mail, and will include the Environmental Compliance Lead and Siskiyou Telephone Company's Subject Matter Expert, as needed. An agenda will be provided before the call.

## **4. Environmental Compliance and Field Procedures**

### **4.1 Pre-Construction Compliance Verification**

Prior to beginning construction, Siskiyou Telephone Company is required by the terms of the mitigation measures, APMs, and various permits and approvals for other regulatory agencies, to prepare and obtain approval of various plans and to perform various surveys and studies. Copies of plans, surveys, and studies will be retained by Aspen and provided to the CPUC with all files at the completion of the Project. The

plans, surveys, studies, and other documentation required to be completed by Siskiyou Telephone Company before construction are identified in Section 6.

While these documents are being reviewed by the approving agencies, they also are reviewed by the CPUC and its representatives. Resource agencies also may be involved in the review of applicable plans and reports.

The CPUC EMs, including project management staff and technical experts as needed, will review and provide comments on all mitigation plans and reports. As appropriate, resource agencies also may be involved in the review of applicable plans and reports, and may provide comments. Comments on submitted plans and reports will be provided to Siskiyou Telephone Company to ensure that they adequately accomplish the intended reduction in impacts. For required local and State agency permitting/consultations, the CPUC EM will track Siskiyou Telephone Company's progress as it relates to Siskiyou Telephone Company's construction plans and project mitigation, APMs, and permitting requirements. Based on Siskiyou Telephone Company's construction plans, CPUC may authorize construction to begin on a phased basis, and the CPUC EM will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

**Important:** Compliance with all pre-construction mitigation measures and APMs will be verified prior to construction, and construction may not start on any work package before Siskiyou Telephone Company receives a written NTP from the CPUC PM and other necessary approvals, if any. In general, the CPUC will not issue an NTP until all pre-construction requirements have been fulfilled for a given phase. To save time, Siskiyou Telephone Company should identify all required workspace needs for each phase of construction prior to the start of active construction, so that the locations and their use can be included in the NTP.

#### 4.1.1 Notice to Proceed Procedures

CPUC must issue an NTP before construction can start.

Siskiyou Telephone Company will submit a formal request for an NTP. If needed, minor project change requests may be submitted by Siskiyou Telephone Company with the NTP request for incorporation into the NTP (see Section 4.3.3 for minor project change submittal requirements). Where there may be multiple spreads or work sites, Siskiyou Telephone Company may elect to request separate NTPs. Each separate NTP request will be applicable to a defined segment or aspect of the Project.

CPUC will review the NTP request and the applicable pre-construction requirements to ensure that all information required to process and approve the NTP is included. CPUC may request additional information or clarification as needed. Based on information provided in the request for an NTP and its review, CPUC will issue the NTP.

In general, an NTP request must include the following:

- A description of the work
- Detailed description of the location, including maps, photos, and/or other supporting documents
- Verification that all mitigation measures, permit conditions or requirements, APMs, project parameters, or other project stipulations that apply to the work covered by the NTP request have been met.
- In a case where some outstanding requirements cannot be met prior to issuance of the NTP, an outline of outstanding submittals and how they will be met prior to construction
- Up-to-date resource surveys or a commitment to conduct surveys and submit survey results prior to construction

- Cultural resource surveys or verification that no cultural resources will be significantly impacted
- Copies of permits issued by other agencies, including any requirements
- Date when construction is anticipated to begin and estimated duration of work

Section 6 lists the mitigation measures and APMs, the timing for implementation, and whether CPUC review or approval is required before construction can begin. For reference, each NTP issued by CPUC will reiterate CPUC and other agency conditions or requirements that must be satisfied either before work begins or during construction. The NTP will state whether pre-construction requirements in mitigation measures, APMs, and permits have been met, including the completion of any applicable surveys and studies to be undertaken. If compliance with some requirements cannot be met prior to NTP issuance, the reasons will be identified by Siskiyou Telephone Company and noted in the NTP. At its discretion, CPUC may issue the NTP subject to specific conditions. In such an event, the NTP will clearly define any limitations that apply and the actions to be taken and documented by Siskiyou Telephone Company prior to construction.

### 4.1.2 Compliance Reporting

The CPUC EM will perform compliance inspections throughout construction to ensure compliance with all applicable mitigation measures, APMs, plans, permits, and conditions of approval from CPUC and other agencies. The CPUC EM will document observations in the project area through field notes and digital photography. The photographs will be incorporated in monitoring reports and related to a discussion of specific construction or compliance activity. In addition, daily field logs documenting compliance of specific crews, construction activities, or resource protection measures will be maintained. Field logs will be used to prepare monitoring reports and to track and update the status of mitigation measures listed in Section 6.

Site visits by CPUC may be coordinated with Siskiyou Telephone Company or be unannounced. Supplemental information provided by Siskiyou Telephone Company, including pre-construction submittals, survey reports, weekly reports, meeting notes, and agency correspondence also will be used to verify compliance.

Compliance documents and reports will be posted on the CPUC public website, accessible at:

<http://www.cpuc.ca.gov/environment/info/asper/siskiyoutelco/siskiyoutelco.htm>

### 4.1.3 Compliance and Non-Compliance Levels

Project compliance and non-compliance levels that will be used and the specific actions by the CPUC monitoring team are as follows:

- **Level A Compliance.** All mitigation measures and permit conditions are being complied with and there are no violations. No corrective action is necessary.
- **Level B Non-Compliance.** One aspect of a mitigation measure is not in compliance, resulting in only partial implementation of a measure or permit condition, but there has been no significant impact as a result.

**Action:** A verbal notice shall be given to the Environmental Compliance Lead (or assigned designee) and corrective action shall be required of Siskiyou Telephone Company within 1 day or other maximum period, as determined by the CPUC EM.

**Follow up:** If corrective action is not taken within the stated period, a Project Memorandum (written warning) will be issued. If a Level B Non-Compliance is allowed to continue, the non-compliant activity could result in a significant impact over time. Therefore, the frequency of Level B Non-Compliances will be tracked by the CPUC EM.



If corrective action is not taken or does not address Level B Non-Compliance trends, a Non-Compliance Report (NCR) will be issued. The NCR will state that failure to resolve the identified condition or situation may lead to a project stop work order and/or action under the CPUC's CEQA Citation Program.

- **Level C Non-Compliance.** One or more of the aspects of a mitigation measure or permit condition are not in compliance, and the implementation of a mitigation measure is deficient or non-existent, resulting in potentially significant impact(s) or an immediate threat of major, irreversible environmental damage or property loss.

**Action:** A verbal notice shall be given to the Environmental Compliance Lead (or assigned designee), followed immediately by an NCR sent to Siskiyou Telephone Company's Environmental Compliance Lead (or assigned designee). Corrective action shall begin immediately.

**Follow up:** If corrective action is not taken immediately or the corrective action is insufficient, the CPUC EM shall notify the CPUC PM, Aspen Monitoring Manager, and Aspen Liaison, who will review courses of action available.

- **Level D Stop Work Order.** The CPUC has the authority to shut down project construction. Stop Work Orders halt construction and are issued when a compliance violation continues over an extended period of time, is repeated several times, or when a violation could cause harm to a resource.

**Action:** Based on the severity of a given infraction or pattern of non-compliant activity, the CPUC Energy Division Director may direct that all or some portion of the work be stopped. This order will be conveyed directly from the Director or through the CPUC PM.

**Follow up:** If a shutdown of construction or an activity is ordered, the construction or activity shall not resume until authorized by the Energy Division Director or CPUC PM in writing.

**Important:** CPUC also may exercise the CEQA Citation Program adopted by the Commission in Resolution E-4550. The program delegates authority to Commission staff to draft and issue citations and levy fines for non-compliance with a PTC or CPCN. The Resolution allows Commission staff to efficiently issue fines when needed to quickly address non-compliance issues that are occurring in the field.

A non-compliant event regarding environmental resources may involve other agencies, in which case:

- The CPUC EM will confirm that Siskiyou Telephone Company has informed the applicable resource agency when non-compliant actions have the potential to harm an environmental resource or species (outside the reporting process associated with incidental takes as permitted by the resource agency).
- If timely notification is not made by Siskiyou Telephone Company, the CPUC EM will contact the applicable resource agency.

If permit or resources issues are involved, the CPUC and/or resource agencies may order work stoppages and the development of strategies for successful resource/species protection, consistent with the applicable permit or mitigation measure.

**Important:** The CPUC EM does not have the authority to shut down or restart construction, nor shall the CPUC EM direct the work of a construction contractor or subcontractor. However, if an imminent threat to safety or an unpermitted risk to a sensitive resource is observed, the CPUC EM has the responsibility to advise the Siskiyou Telephone Company or contractor site manager to immediately cease the threatening activity until the situation is rectified, as long the activity can be stopped safely. The CPUC EM shall immediately notify the CPUC PM and Aspen Monitoring Manager and report the status. If no action is taken by Siskiyou Telephone Company in response to the situation, CPUC will determine next steps.

#### **4.1.4 Compliance Reporting and Documentation**

All non-compliant activity will be recorded and reported. Based on the severity of the non-compliant event, notice to CPUC will be immediate or in the weekly report.

The CPUC EM will determine whether the observed construction activities are consistent with mitigation measures, APMs, and project parameters as identified in the Final MND and adopted by the CPUC, as well as any applicable permit conditions. All observations and communications will be noted in a logbook. Deviations from mitigation measures, APMs, or permit conditions will be considered non-compliant events and will be documented.

#### **4.1.5 Siskiyou Telephone Company Reportable Events**

Unanticipated events may occur that impact project personnel, public safety, or resources and may not be observed by the CPUC EM. While these events may not result in a deviation from or violation of a mitigation measure or permit condition, it is important that these events be reported to the appropriate agencies and the CPUC so they are in a position to respond to questions or concerns from the public or managers. Accordingly, Siskiyou Telephone Company will immediately report these events to the CPUC and other regulatory agencies as appropriate. Siskiyou Telephone Company will submit to the appropriate agency, if any, and to CPUC a final verbal or electronic notification characterizing the event, actions taken, and outcomes.

Any event that affects, or could potentially affect, Project personnel or public health and safety is immediately reportable and would include the following examples:

- An occurrence that posed or could have posed a risk to public health and safety
- Any event requiring emergency response (police or fire)
- A 'near miss' event involving construction equipment and, in the Siskiyou Telephone Company EPM's reasonable judgment, had the potential to result in serious bodily harm or death
- Any fire caused by construction activities
- Inadequate traffic control resulting in an accident
- Any toppled piece of equipment

Any event that impacts, or poses an imminent risk to, a sensitive resource is immediately reportable and would include the following examples:

- Any event a mitigation measure failed to address
- A violation of a permit condition
- Any resource buffer incursion by construction personnel or significant non-compliance incident
- Any directed work stoppage or construction holds
- Discovery of unanticipated resources such as archaeological artifacts outside of known cultural sites

### **4.2 Dispute Resolution**

The MMCRP is intended to reduce or eliminate potential disputes. However, even with the best preparation, differences in mitigation implementation approaches and interpretation may occur. Issues should first be addressed informally at the field level, between the CPUC EM and Siskiyou Telephone Company's EIs or Environmental Monitors, and at the regular progress meetings. Questions may be raised to the Siskiyou Telephone Company Environmental Compliance Lead and the Siskiyou Telephone Company Project Manager for resolution. Should the issue persist or not be resolved at these levels, the following procedures will be used.

- Step 1.** Differences in mitigation implementation approaches, disputes, and complaints (including those of the public) are directed to the CPUC PM for resolution. The PM will attempt to resolve the dispute with Siskiyou Telephone Company's Environmental Project Manager.
- Step 2.** If Step 1 fails to resolve the issue, the CPUC PM may initiate enforcement or compliance action to address deviations from the Project or the adopted MMCRP, if they have occurred without prior authorization. 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 the differences, dispute, or complaint cannot be resolved informally or through enforcement or compliance action by the CPUC, the 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) will meet or confer with the filer and other affected participants to resolve the dispute. The Executive Director will issue an Executive Resolution describing the decision, and serve 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 parties may appeal it to the Commission via a procedure to be specified by the Commission.

Involved parties may also seek review by the Commission through procedures specified in the Commission's 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.

Separate enforcement steps by the regulatory agencies may follow different steps or procedures. The CPUC PM and the Environmental Compliance Lead will coordinate with other permitting agencies for issues outside CPUC's jurisdiction. Separate dispute resolution or enforcement steps solely involving other regulatory agencies would follow that agency's procedures.

The dispute resolution process could occur concurrently with the communication protocol during construction for non-compliant events.

## **4.3 Project Changes**

Changes to the proposed Project may be needed to accommodate final design, facilitate construction, and/or provide more effective protection of resources. When changes are necessary for specific field situations, Siskiyou Telephone Company and CPUC, in consultation with the applicable resource agencies, will work together to find solutions that avoid conflicts with adopted mitigation measures.

### **4.3.1 Transition from Preliminary Design to Final Engineering**

The MND for the Project was based on preliminary designs. Some project component locations may have been refined as engineering progresses in order to comply with mitigation measures, avoid or minimize environmental impacts, and reduce or eliminate feasibility constraints.

Mitigation measure requirements were finalized at the time of project approval, and pre-construction compliance submittals will be reviewed based on the requirements in these measures. The process outlined below allows for changes in the case of unforeseen circumstances, as long as the intent of the mitigation measure is satisfied (i.e., the impact is mitigated as intended, consistent with residual impact determinations in the MND).

### 4.3.2 Minor Project Changes

The CPUC PM, along with the CPUC Monitoring Team, will ensure that any process to consider minor project changes that may be necessary due to final engineering or variances or deviations from the procedures identified under the monitoring program is consistent with CEQA requirements.

- No project changes will be approved by the CPUC PM if they
  - would be located outside of the geographic boundary of the project study area,
  - create new or substantially more severe significant impacts, or
  - conflict with any mitigation measure or applicable law or policy.
- Minor project changes are strictly limited to changes that
  - will not trigger other permit requirements unless the appropriate agency has approved the change, and
  - clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

This determination is ministerial, and shall be made by the CPUC Project Manager. Siskiyou Telephone Company must seek any other project changes by a Petition for Modification (PFM). Should a project change require a PFM, supplemental environmental review under CEQA would be required.

Requests for staff approval of a minor project change must be made in writing and should include the following:

- A detailed description of the proposed minor changes, including an explanation of why the refinements are necessary, and a reference to the approved documents.
- Photos, maps, and other supporting documentation illustrating the difference between: the existing conditions in the area, the approved project, and the proposed minor changes.
- The potential impacts of the proposed minor changes, including a discussion of each environmental issue area that could be affected by the minor changes with accompanying verification that there will be no substantial increase in the severity of any previously identified significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted mitigation.
- Whether the minor changes conflict with any applicant proposed measures or mitigation measures.
- Whether the minor changes conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute or policy.
- Water/wetland/storm water related resource information if the minor changes would result in any additional land disturbance, road distance or width, changes to jurisdictional delineation of waters, or changes to water protection best management practices.
- Date of expected construction at the minor changes site area.

The CPUC PM may request additional information or a site visit in order to process the request. Examples of changes that may be approved by staff after final engineering include, but are not limited to:

- Adjusting the alignment or position of a project element to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners.
- Adjusting the alignment or position of a project element to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis.

**Important:** The changes must be located within the geographic study area used in the original environmental analysis and must not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

To initiate a minor project changes request, Siskiyou Telephone Company will complete a Minor Project Change Request Form (see Attachment B), prepare the appropriate supporting documentation, and obtain the required signatures. Siskiyou Telephone Company will submit the completed Minor Project Change Request Form and supporting documentation by email (scanned copy) to the CPUC Project Manager with a copy to Aspen.

The CPUC Monitoring Team will review the request to ensure that all of the information required to process the minor project change 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 from the CPUC EM, or may request additional information to process the request. Minor Project Changes usually include a list of bulleted conditions at the end to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) and are based on specific site conditions and/or are proposed conditions by Siskiyou Telephone Company. Also, Minor Project Changes may require approval by jurisdictional agencies as well.

All approved Minor Project Change Requests will be tracked in the monitoring reports.

### **4.3.3 Temporary Extra Work Space Procedures**

For the purposes of this MMCRP, Temporary Extra Work Space (TEWS) is defined as an existing workspace (i.e., no site preparation is required) that was not specifically identified and evaluated during the CEQA process but would be used by Siskiyou Telephone Company during construction for a period of up to 60 days. Any such location required to be utilized for a period longer than 60 days will require a minor project change approval (see Section 4.3.3).

In the event that Siskiyou Telephone Company determines a need for a construction TEWS, it must submit such a request to the CPUC, consistent with the communication protocol. Siskiyou Telephone Company will not be permitted to use a TEWS prior to receiving written authorization from the CPUC. If appropriate, Siskiyou Telephone Company will also send a copy of the TEWS to affected jurisdictional agencies.

Siskiyou Telephone Company must demonstrate that:

- (1) the TEWS is located in a disturbed area with no sensitive resources or land uses onsite or within proximity of the proposed workspace such that they may be significantly impacted by the work,
- (2) Siskiyou Telephone Company has permission of the landowner (e.g., municipality or private) to use the workspace, and
- (3) use of the TEWS will not result in any significant environmental impacts.

Following is a list of the specific information that Siskiyou Telephone Company would be required to submit with its TEWS request:

- Date of request
- Location of the TEWS (detailed description, including maps if required)
- Property owner of TEWS
- An explanation of the need for the TEWS

- An analysis that demonstrates no new significant impacts will result from use of the TEWS including: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as old oil spills or other potentially hazardous or polluting substances; abandoned vehicles, equipment, or other materials; or other sensitive resources
- Biological and botanical surveys, if appropriate
- Cultural resource survey
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

A sample TEWS form is included as Attachment C.

## 5. Records Management

Weekly status reports will be filed and used by the CPUC third-party EM to prepare a final environmental compliance report following the completion of construction. The final report will provide an overview of construction and a discussion of environmental compliance and lessons learned.

### 5.1 Public Access to Records

A publicly accessible website for the Project is maintained by the CPUC to make available current versions of reports and other documents prepared for mitigation compliance.

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 on the CPUC project website consistent with critical infrastructure requirements, requirements to protect cultural resources, and General Order (G.O.) 66-C. In order to facilitate the public's awareness, the CPUC will post this MMCRP document, monitoring reports, and other pertinent Project documents on the CPUC public website. Other monitoring compliance reports, copies of permits, and documents will be available in their final form on the Project website once they are approved by the CPUC or other permitting agencies. Access to Critical Energy Infrastructure Information (CEII) documentation, the location of protected cultural resources, and other information meeting the standards for non-disclosure set forth in G.O. 66-C will not be available on the public website.

The CPUC public website is accessible at:

<http://www.cpuc.ca.gov/environment/info/aspern/siskiyoutelco/siskiyoutelco.htm>

## 6. Mitigation Measures and APMs

The following tables include the mitigation measures and APMs from the adopted MND. The tables indicate the resource of concern, the measure to be implemented, the monitoring requirement, and when the measure is to be implemented.

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<b>Biological Resources</b>			
Construction Phase Biological Resource Impacts	<b>APM BIO-1:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-2:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-8:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>MM B-1: Conduct Environmental Training, Pre-Construction Surveys, and Biological Resources Monitoring.</b> 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.  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 or candidate 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.  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.	Biologist resumes to be submitted to the CPUC for review and approval prior to the start of construction.  WEAP brochure to be submitted to the CPUC for review and approval prior to construction.	X	X

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Special Status Plants, Wetlands, and Riparian Zones Impacts	<p><b>MM B-2: Preserve Special-Status Plants, Wetlands, and Riparian Zones.</b> 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"> <li>▪ Design Project and construction activities to avoid impacts to wetlands and water features to the extent feasible.</li> <li>▪ 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.</li> </ul> <p>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 and/or flagging remains intact and that construction activities do not affect the delineated areas.</p>	Ensure wetland and water features are clearly marked for avoidance.	X	X
Construction Phase Biological Resource Impacts	<p><b>MM B-3: Minimize Horizontal Directional Drilling (HDD) Potential Impacts.</b> 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"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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 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.</li> <li>▪ 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.</li> </ul>	Review and approve Frac-Out Contingency Plan. Ensure boring operations are situated outside of wetlands and riparian areas.	X	X



Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ All equipment required to contain and clean up a frac-out release shall be available at the work site.                             <ul style="list-style-type: none"> <li>– Boring plans should include:                                     <ul style="list-style-type: none"> <li>– 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,</li> <li>– Proposed depth of bore and statement of streambed condition (subsurface strata and percent of gravel and cobble) that support the depth of the bore,</li> <li>– Approximate length of bores (50-foot increments),</li> <li>– Type and size of boring equipment to be used (categorized as mini, mid or maxi),</li> <li>– Estimated time to complete bore,</li> <li>– List of lubricants and HDD additives to be used including Material Safety Data Sheets (MSDS), and</li> <li>– Name of Operator’s agents and cell phone numbers.</li> </ul> </li> </ul> </li> <li>▪ Frac-out prevention and clean-up plans should include:                             <ul style="list-style-type: none"> <li>– Name(s) and phone numbers of biological monitor(s) and crew supervisor(s),</li> <li>– Site specific resources of concern (if applicable, include factors such as possible presence of sensitive species),</li> <li>– Monitoring protocols (include biological monitoring and frac-out monitoring), and</li> <li>– 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).</li> </ul> </li> <li>▪ If a frac-out or spill occurs in a sensitive resource, the Operator shall immediately notify the CPUC Environmental Monitor.</li> </ul> <p>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 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></p>			
Construction Phase Nesting and Migratory Bird Impacts	<p><b>MM B-4: Pre-Construction Surveys and Impact Avoidance Measures for Migratory and Nesting Birds.</b> 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>	<p>Avian biologist resume shall be submitted to the CPUC for review and approval.</p> <p>Preconstruction surveys shall be submitted to the CPUC for review and approval.</p>	X	X

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<p>a. Surveys shall cover all potential nesting habitat within disturbance areas and within a 500-foot buffer of these areas.</p> <p>b. Surveys shall be conducted no more than 3 days prior to the start of ground-disturbing activity.</p> <p>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.</p> <p>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 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>			

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<b>Cultural Resources</b>			
Construction Phase Cultural Resource Impacts	<b>APM CUL-1:</b> 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.	X	X
	<b>Geology and Soils</b>			
Construction Phase Geology and Soils Impacts	<b>APM GEO-1:</b> 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.	X	X
Construction Phase Geology and Soils Impacts	<b>APM GEO-2:</b> 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.	X	X
Construction Phase Impacts to Geology and Soils - Landslides	<b>MM GS-1: Conduct geotechnical/geologic surveys for landslides and unstable slopes.</b> 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.	X	X

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
<b>Hazards and Hazardous Materials</b>				
Construction Phase Hazardous Material Impacts	<p><b>APM HAZ-2:</b> 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"> <li>▪ Equipment would be maintained in good working order, and equipment containing hazardous materials would be inspected periodically for signs of spills or leakage.</li> <li>▪ Spills that occur would be cleaned up immediately, and any contaminated soil would be containerized and properly disposed of.</li> <li>▪ Spills that occur would be reported in accordance with applicable federal, state, and local requirements.</li> <li>▪ Emergency phone numbers would be available onsite.</li> </ul>	Ensure a SWPPP is prepared and BMPs are implemented to minimize the potential for accidental release of hazardous materials.	X	X
Construction Phase Fire Impacts	<p><b>APM HAZ-3:</b> 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.	X	X
Construction Phase Hazardous Material and Emergency Impacts	<p><b>MM H-1: Prepare and Implement Worker Environmental Awareness Program (WEAP).</b> 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"> <li>▪ 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.</li> <li>▪ Instruction on compliance with Proposed Project mitigation measures.</li> <li>▪ 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).</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	WEAP brochure and emergency response procedures to be submitted to the CPUC for review and approval prior to construction.	X	X

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Hazardous Material Impacts	<p><b>MM H-2: Prepare and Implement a Hazardous Materials and Waste Management Plan.</b> 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"> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ 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"> <li>– 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.</li> <li>– 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.</li> <li>– 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.</li> </ul> </li> <li>▪ A list of the adequate safety and fire suppression devices for construction activities involving toxic, flammable, or exposure materials;</li> <li>▪ 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</li> <li>▪ A description of the waste minimization procedures to be implemented during construction of the Proposed Project</li> </ul>	Review and approve Hazardous Materials and Waste Management Plan and ensure procedures are implemented during construction.	X	X

Table 6A. Mitigation Monitoring Plan – Pre-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Contaminated Soil Impacts	<b>MM H-3: Conduct Sampling and Testing for ADL.</b> 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.	X	X
<b>Hydrology and Water Quality</b>				
Construction phase water quality impacts	<b>APM HYDRO-2:</b> 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"> <li>▪ Dry-season (April through October) construction to minimize erosion and storm water sediment transport</li> <li>▪ Use of silt fences or fiber rolls to prevent the migration of sediment offsite</li> <li>▪ Application of water to disturbed areas during work or windy conditions to prevent dust and erosion</li> <li>▪ Use of drip pans for mobile fueling</li> </ul>	Ensure a SWPPP is prepared and BMPs are implemented to minimize construction impacts on surface water and groundwater quality.	X	X
<b>Land Use</b>				
Construction Phase Land Use Impacts	<b>APM LU-1:</b> Siskiyou Telephone would obtain permits to construct from USFS, Caltrans, and the CPUC.	Ensure permits are received prior to construction.	X	X
<b>Public Services</b>				
Construction Phase Emergency Service Provider Impacts	<b>APM PS-1:</b> 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.	Review correspondences with local emergency service providers and ensure fire extinguishers and shovels are maintained onsite.	X	X
<b>Traffic/Transportation</b>				
Construction Phase Traffic Impacts	<b>APM TRF-1:</b> 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.	Review and ensure implementation of traffic control measures in accordance with Caltrans requirements.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<b>Air Quality</b>			
Construction Phase Fugitive Emissions and Dust Impacts	<b>APM AQ-1:</b> Construction of the proposed project would occur during the dry season (April through October). To reduce fugitive emissions, 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.	X	X
Construction Phase Fugitive Emissions and Dust Impacts	<b>MM AQ-1: Control Construction-Related Dust.</b> 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: <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ 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; where potential accidental contamination of wetlands, streams, or rivers could occur, water shall be used instead of chemical dust suppressants.</li> <li>▪ 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; where potential accidental contamination of wetlands, streams, or rivers could occur, water shall be used instead of chemical dust suppressants.</li> <li>▪ Earthmoving areas and excavated materials shall be pre-wetted to the depth of the anticipated cuts.</li> <li>▪ 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.</li> </ul>	Ensure work areas are wet, roadways are cleaned, piles are stabilized, and particulate matter emissions are minimized.	X	X
	<b>Biological Resources</b>			
Construction Phase Biological Resource Impacts	<b>APM BIO-1:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-2:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-3:</b> 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.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Biological Resource Impacts	<b>APM BIO-4:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-5:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-6:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-7:</b> 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.	X	X
Construction Phase Biological Resource Impacts	<b>APM BIO-8:</b> 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.	Ensure monitors present at appropriate distances from crossing points and frac-out equipment is onsite.	X	X
Construction Phase Biological Resource Impacts – Wyman Creek	<b>APM BIO-9:</b> 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.	X	---
Construction Phase Special-Status Plant and Wildlife Species Impacts	<b>MM B-1: Conduct Environmental Training, Pre-Construction Surveys, and Biological Resources Monitoring.</b> 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.  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	Weekly compliance reports shall be submitted to the CPUC for review.	X	X



Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<p>found, they shall be relocated outside of the work area into adjacent appropriate habitat by the qualified biologist. If listed or candidate 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>			
Construction Phase Special-Status Plant and Wildlife Species Impacts	<p><b>MM B-2: Preserve Special-Status Plants, Wetlands, and Riparian Zones.</b> 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"> <li>▪ Design Project and construction activities to avoid impacts to wetlands and water features to the extent feasible.</li> <li>▪ 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.</li> <li>▪ 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 and/or flagging remains intact and that construction activities do not affect the delineated areas.</li> </ul>	<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>	X	X
Construction Phase Special-Status Plant and Wildlife Species Impacts	<p><b>MM B-3: Minimize Horizontal Directional Drilling (HDD) Potential Impacts.</b> 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"> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	<p>Ensure boring operations are situated outside of wetlands and riparian areas.</p> <p>Ensure drilling is conducted during daylight hours.</p> <p>Ensure any frac-outs are handled according to the approved Frac-Out Contingency Plan.</p>	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<ul style="list-style-type: none"> <li>▪ 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 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ All equipment required to contain and clean up a frac-out release shall be available at the work site.</li> <li>▪ Boring plans should include:                         <ul style="list-style-type: none"> <li>– 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,</li> <li>– Proposed depth of bore and statement of streambed condition (subsurface strata and percent of gravel and cobble) that support the depth of the bore,</li> <li>– Approximate length of bores (50-foot increments),</li> <li>– Type and size of boring equipment to be used (categorized as mini, mid or maxi),</li> <li>– Estimated time to complete bore,</li> <li>– List of lubricants and HDD additives to be used including Material Safety Data Sheets (MSDS), and</li> <li>– Name of Operator’s agents and cell phone numbers.</li> </ul> </li> <li>▪ Frac-out prevention and clean-up plans should include:                         <ul style="list-style-type: none"> <li>– Name(s) and phone numbers of biological monitor(s) and crew supervisor(s),</li> <li>– Site specific resources of concern (if applicable, include factors such as possible presence of sensitive species),</li> <li>– Monitoring protocols (include biological monitoring and frac-out monitoring), and</li> <li>– 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).</li> </ul> </li> <li>▪ If a frac-out or spill occurs in a sensitive resource, the Operator shall immediately notify the CPUC Environmental Monitor.</li> <li>▪ 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</li> </ul>			

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Nesting and Migratory Bird Impacts	<p><b>MM B-4: Pre-Construction Surveys and Impact Avoidance Measures for Migratory and Nesting Birds.</b>                      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"> <li>Surveys shall cover all potential nesting habitat within disturbance areas and within a 500-foot buffer of these areas.</li> <li>Surveys shall be conducted no more than 3 days prior to the start of ground-disturbing activity.</li> <li>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.</li> <li>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 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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>	Ensure surveys and monitoring are conducted in accordance with guidelines outlined in MM B-4.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	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>			
Construction Phase Biological Resource Impacts	<b>MM B-5: Avoid Wildlife Entrapment.</b> 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>	Ensure excavated areas are properly backfilled, ramped, and/or covered at the end of each work day.	X	X
<b>Cultural Resources</b>				
Construction Phase Cultural Resource Impacts	<b>APM CUL-1:</b> 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.	X	X
Construction Phase Cultural Resource Impacts	<b>APM CUL-2:</b> 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"> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	Ensure notification occurs, disturbance ceases, and the find is assessed by a qualified archaeologist.	X	X

<b>Table 6B. Mitigation Monitoring Plan – During-Construction Measures</b>			<b>1</b>	<b>2</b>
<b>Impact</b>	<b>Applicant Proposed Measure (APM) or Mitigation Measure</b>	<b>Monitoring Requirement</b>	<b>Klamath National Forest</b>	<b>Six Rivers National Forest</b>
Construction Phase Paleontological Resource Impacts	<b>APM CUL-3:</b> 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.	X	X
Construction Phase Cultural and Tribal Resource Impacts	<b>APM CUL-4:</b> 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.	X	X
Construction Phase Cultural and Tribal Resource Impacts	<b>APM CUL-5:</b> 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.	X	X
<b>Geology and Soils</b>				
Construction Phase Geology and Soils Impacts	<b>APM GEO-1:</b> 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.	X	X
Construction Phase Geology and Soils Impacts	<b>APM GEO-2:</b> 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.	X	X
Construction Phase Geology and Soils Impacts - Landslides	<b>MM GS-1: Conduct geotechnical/geologic surveys for landslides and unstable slopes.</b> 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.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<b>Greenhouse Gas Emissions</b>			
Construction Phase Greenhouse Gas Emissions Impacts	<b>APM GHG-1:</b> To the extent feasible, unnecessary construction vehicle and idling time would be minimized.	Ensure idling is minimized to reduce emissions from construction equipment.	X	X
	<b>Hazards and Hazardous Materials</b>			
Construction Phase Hazardous Material Impacts	<b>APM HAZ-1:</b> 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.	X	X
Construction Phase Hazardous Material Impacts	<b>APM HAZ-2:</b> 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: <ul style="list-style-type: none"> <li>▪ Equipment would be maintained in good working order, and equipment containing hazardous materials would be inspected periodically for signs of spills or leakage.</li> <li>▪ Spills that occur would be cleaned up immediately, and any contaminated soil would be containerized and properly disposed of.</li> <li>▪ Spills that occur would be reported in accordance with applicable federal, state, and local requirements.</li> <li>▪ Emergency phone numbers would be available onsite.</li> </ul>	Ensure a SWPPP is prepared and BMPs are implemented to minimize the potential for accidental release of hazardous materials.	X	X
Construction Phase Fire Impacts	<b>APM HAZ-3:</b> 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.	Review fire management plan.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Hazardous Material Impacts	<p><b>MM H-1: Prepare and Implement Worker Environmental Awareness Program (WEAP).</b> 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"> <li>▪ 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.</li> <li>▪ Instruction on compliance with Proposed Project mitigation measures.</li> <li>▪ 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).</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul>	WEAP brochure and emergency response procedures to be submitted to the CPUC for review and approval prior to construction.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Hazardous Material Impacts	<p><b>MM H-2: Prepare and Implement a Hazardous Materials and Waste Management Plan.</b> 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"> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ 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;</li> <li>▪ 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"> <li>– 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.</li> <li>– Construction equipment such a 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.</li> <li>– 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.</li> </ul> </li> <li>▪ A list of the adequate safety and fire suppression devices for construction activities involving toxic, flammable, or exposure materials;</li> <li>▪ 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</li> <li>▪ A description of the waste minimization procedures to be implemented during construction of the Proposed Project.</li> </ul>	Review and approve Hazardous Materials and Waste Management Plan and ensure procedures are implemented during construction.	X	X



Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
Construction Phase Potentially Contaminated Soil Impacts	<b>MM H-3: Conduct Sampling and Testing for ADL.</b> 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.	X	X
<b>Hydrology and Water Quality</b>				
Construction Phase Stormwater Pollution Impacts	<b>APM HYDRO-2:</b> 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"> <li>▪ Dry-season (April through October) construction to minimize erosion and storm water sediment transport</li> <li>▪ Use of silt fences or fiber rolls to prevent the migration of sediment offsite</li> <li>▪ Application of water to disturbed areas during work or windy conditions to prevent dust and erosion</li> <li>▪ Use of drip pans for mobile fueling</li> </ul>	Ensure a SWPPP is prepared and BMPs are implemented to minimize construction impacts on surface water and groundwater quality.	X	X
<b>Noise</b>				
Construction Phase Noise Impacts	<b>APM NOI-1:</b> During construction of the proposed project, the following BMPs would be implemented to minimize noise impacts: <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ All stationary noise-generating equipment would be located as far as possible from nearby noise-sensitive receptors.</li> <li>▪ 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.</li> <li>▪ The construction contractor would ensure that noise-generating mobile equipment and machinery are turned off when not in use.</li> </ul>	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.	X	X

Table 6B. Mitigation Monitoring Plan – During-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Klamath National Forest	Six Rivers National Forest
	<b>Public Services</b>			
Construction Phase Emergency Service Provider Impacts	<b>APM PS-1:</b> 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.	Review correspondences with local emergency service providers and ensure fire extinguishers and shovels are maintained onsite.	X	X
	<b>Traffic/Transportation</b>			
Construction Phase Traffic Impacts	<b>APM TRF-1:</b> 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.	Review and ensure implementation of traffic control measures in accordance with Caltrans requirements.	X	X
	<b>Utilities and Service Systems</b>			
Construction Phase Solid Waste Impacts	<b>APM UTL-1:</b> 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.	Ensure solid waste is transported offsite daily.	X	X

Table 6C. Mitigation Monitoring Plan – Post-Construction Measures			1	2
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring Requirement	Sub-station	Fulton Line and Distribution
	<b>Hydrology and Water Quality</b>			
Construction Phase Stormwater Pollution Impacts	<b>APM HYDRO-1:</b> 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.	X	X