

ATTACHMENT A
Comments and Responses



Responses to Comments for the Draft Initial Study and Mitigated Negative Declaration

(State Clearinghouse No. 2014032061)

for

Crown Castle NG West, Inc.
San Mateo County Project
(Application No. 13-02-007)

May 2015

Prepared for:
California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, California 94102

Prepared by:
DUDEK

**Final Initial Study and Negative Declaration for
Crown Castle NG West Inc.**

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Crown Castle NG West Inc.**

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1 INTRODUCTION

This attachment provides responses to comments received during the Draft Initial Study and Mitigated Negative Declaration (IS/MND) for the San Mateo County Project (proposed project) public review period, which began on March 20, 2014, and ended on April 21, 2014. Detailed responses are provided to individual comments in Section 4, Responses to Comments, of this attachment, which also provides copies of comments submitted on the Draft IS/MND.

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2 COMMENT LETTERS RECEIVED

Table 1-1 provides an index of the comment letters received and the corresponding numbered responses. Comment letters are organized by category and then chronologically in the order the letter was received. Each letter is assigned a letter designation, and each comment within that letter is numbered. Comment letters, bracketed by comment, are reproduced in their entirety, and are followed by responses to each comment. Changes to the Draft IS/MND, where deemed appropriate, are summarized in the response and refer to the applicable section in the Final IS/Negative Declaration (ND). Text changes are indicated with strikethrough/underline. Text changes are also provided in the Final ND.

Table 1-1
Index to Comment Letters and Responses to Comments

Comment Letter Designation	Agency/Respondent and Date of Letter	Response Designations
1	California Department of Transportation (April 17, 2014)	1-1 through 1-4
2	California Department of Parks and Recreation, Santa Cruz District (April 17, 2014)	2-1 through 2-5
3	Erika Perloff (April 18, 2014)	3-1 through 3-2
4	California Coastal Commission (April 18, 2014)	4-1 through 4-5

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3 PUBLIC MEETING

A public meeting was held on Thursday, April 10, 2014, at Native Sons Community Hall, 112 Stage Road, Pescadero, California, between 6:30 p.m. and 8:30 p.m. Attendees were Jensen Uchida (CPUC), Jennifer Johnson, and Iain Fisher (Dudek). Two members of the public attended the meeting; however, no public comments were made.

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4 RESPONSES TO COMMENTS

Responses to comments follow this page.

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Comment Letter 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-6053
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



*Flex your power!
Be energy efficient!*

April 17, 2014

SM001404
SM-1-0.00-11.47
SCH # 2014032061

Mr. Jensen Uchida
Crown Castle San Mateo County Project (c/o Dudek)
44 Montgomery, Suite 1560
San Francisco, CA 94104

Dear Mr. Uchida:

Crown Castle San Mateo County Distributed Antenna System – Mitigated Negative Declaration

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. We have reviewed the Mitigated Negative Declaration (MND) and have the following comments to offer.

Hydraulics

During the construction of underground installation work, please ensure all existing drainage facilities remain functional unless a temporary drainage is provided on site. Any damage of the existing drainage facilities due to horizontal directional bore or trenching shall be repaired or replaced by the contractor. The proposed Best Management Practice (BMP) should be in conformance with Caltrans Design Criteria.

1-1

Cultural Resources

Please provide copies of the Cultural Resource Technical Studies referenced in this report for our review. Those studies are:

- ICF International. 2013. *Crown Castle NG West Inc. Davenport San Mateo County Project 2013 Pescadero Extension Environmental and Cultural Context*. May 2013.
- ICF International. 2012. *Cultural Resources Inventory Report for the Crown Castle NG West, Inc. Davenport Phase II (San Mateo County) Project*. Draft. December 2012.

1-2

"Caltrans improves mobility across California"

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Mr. Jensen Uchida/ Dudek for the California Public Utilities Commission
April 17, 2014
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Landscape Maintenance

Please explain the extent of tree removal, if any. Also, please be aware that trenching operations may impact existing irrigation systems, requiring repair or replacement.

| 1-3

| 1-4

Please feel free to call or email Sandra Finegan at (510) 622-1644 or sandra.finegan@dot.ca.gov with any questions regarding this letter. You may also contact me at (510) 286-6053 or erik.alm@dot.ca.gov.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development – Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"

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Comment Letter 1

California Department of Transportation

April 17, 2014

- 1-1** The Applicant and/or its contractor would coordinate with the Department of Transportation (Caltrans) and conduct a preconstruction visual inspection—and coring, where necessary—to ensure conflicts with irrigation lines and/or drainage facilities, if present, would be avoided.

As indicated in Section 5.9, Hydrology and Water Quality, of the Final IS/ND, “Highway 1 (Hwy 1) is generally constructed on compacted fill of various thickness that includes undercrossings such as concrete and pipe culverts to allow passage of creek flows. [...] The location of where underground portions of the alignment cross perennial or intermittent creeks would be where the creeks are culverted; these drainage features would be avoided by boring under them.” Furthermore, as indicated in this section of the IS/ND, “[t]he portion of the alignment to be constructed using horizontal directional drilling (HDD) would cross Año Nuevo Creek, Cold Dip Creek, and one intermittent drainage where they are conveyed beneath Hwy 1.[...]” No landscaping or irrigated areas were observed in the shoulder of Hwy 1 during initial site visits, but visual inspection prior to construction would ensure that irrigation lines, if present, are avoided.

To clarify this standard construction practice, the following information was added to IS/ND Chapter 4.0, Project Description, under the subsection Underground Installation:

Existing Utility and Drainage Facilities

Prior to construction of underground components of the proposed project (and as part of standard practice for excavation projects in California), the Applicant and/or its contractor would conduct a check for underground utilities using the Underground Service Alert service. This service marks the location of other utilities so that the construction contractor can avoid conflicts, maintain service, and/or temporarily relocate and replace any affected lines, in coordination with their owners.

Given the California Department of Transportation (Caltrans) may have facilities not registered with Underground Service Alert, the Applicant and/or its contractor would also conduct a visual inspection to identify other features, such as culvert undercrossings and irrigation lines that would require avoidance, temporary relocation, or replacement. For portions of the horizontal directional drilling (HDD)

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that would cross culvert undercrossings along Hwy 1, the construction contractor would advance a core through the highway shoulder to determine the depth to the drainage crossing, and would direct the HDD in a manner that avoids damage to Caltrans drainage infrastructure.

This addition to the project description is a clarification of standard construction practices and does not substantially change the significance conclusions for any of the environmental resources discussed in the IS/ND.

- 1-2** Via email on April 21, 2014, the commenter was directed to the Cultural Resources Technical Reports available online at <http://www.cpuc.ca.gov/environment/info//dudek/crowncastle/Crown%20Castle%20PEA%2008-23-13%20for%20Public.pdf>. No further information request and/or comments were received from this commenter.
- 1-3** As stated in Chapter 4.0, Project Description, of the IS/ND, “it would not be necessary to remove trees” as part of the proposed project.
- 1-4** Refer to Comment Response 1-1.

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Comment Letter 2



State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION
Santa Cruz District
303 Big Trees Park Road
Felton, CA 95018

Major General Anthony L. Jackson, USMC (Ret), Director

April 17, 2014

Mr. Jensen Uchida
Crown Castle San Mateo County Project
c/o Dudek
44 Montgomery, Suite 1560
San Francisco, CA 94104

RE: Crown Castle NG West Inc. San Mateo County DAS Project
(Application No. 13-02-007)

Dear Mr. Uchida:

Thank you for the opportunity to review the Draft Initial Study and Mitigated Negative Declaration (MND) for this project. We have the following comments.

Significant portions of this project are located either in, or adjacent to California Department of Parks and Recreation (State Parks) property on the San Mateo Coast. Numerous existing utility poles included in this project are on State Park property.

2-1

Within the MND, the proposed changes are described as minor and incremental. The visual impact is primarily evaluated from the perspective of a passing motorist, as motorists are considered the "primary affected viewer group." The impact on the overall scenic character of the two impacted State Park units, and the potential impact on park visitors are not adequately considered in that analysis.

2-2

Año Nuevo State Park and Pigeon Point Light Station State Historic Park are both renowned for their scenic resources, in addition to other natural and cultural resource values. The proposed project could adversely impact the scenic resources and visual landscapes of both park units, and have the potential to degrade the overall experience for both park visitors and motorists passing by these areas.

The proposed project is acknowledged to have incremental negative impacts on scenic areas. The cumulative impact of such incremental changes within a sensitive scenic area, and on the special case of State Park visitors, should be considered.

2-3

State Parks has identified the need to reduce the visual impacts from utility lines on State Park property. The California State Park and Recreation Commission has adopted a policy providing that utilities "shall be placed underground in units of the State Park System" and that it "shall be the objective of the Department of Parks and Recreation ultimately to achieve the undergrounding of all existing above-ground utilities" (Statement of Policy: Policy III.8 Utilities). The General Plan for Año Nuevo State Park

2-4

Final Initial Study and Negative Declaration for Crown Castle NG West Inc.

(2008) includes the recommendation to place utility lines underground and remove utility lines and poles where feasible. Additional undergrounding of fiber optics cable and relocation of above ground facilities from sensitive locations such as Año Nuevo State Park and Pigeon Point Light Station State Historic Park should be considered.

2-4
con'd

2-5

If you have any questions regarding these comments, please contact Paul Keel, Park Superintendent at (650) 726-8819.

Sincerely,



For Chet Bardo
District Superintendent

Cc: Paul Keel, Sector Superintendent
Victor Roth, Senior Park and Recreation Specialist
Joanne Kerbavaz, Senior Environmental Scientist
Terry Kiser, Supervising State Park Ranger

Final Initial Study and Negative Declaration for Crown Castle NG West Inc.

Comment Letter 2

**California Department of Parks and Recreation, Santa Cruz District
April 17, 2014**

2-1 The commenter states that portions of the proposed alignment are on State Park lands. In response to comments from State Parks, the Applicant has proposed realignment of the proposed project such that overhead components of the project would avoid State Park lands.

The Applicant proposes to reroute segments of the proposed project originally proposed within State Park land (e.g., one within Pigeon Point Light Station State Park and two within Año Nuevo State Park) to be installed underground using Horizontal Direction Drilling (HDD) methods within the seaward shoulder of Hwy 1/Caltrans right-of-way (ROW). The first section would avoid Pigeon Point Lighthouse by traversing approximately 0.73 mile of Hwy 1 between the junction where Pigeon Point Road crosses Hwy 1 near the lighthouse entrance and rejoins Hwy 1 to the north. The second section would be a 0.35 mile extension to the already described underground section starting at Gazo Creek. The third section would avoid the southern portion of Año Nuevo State Park from approximately 800 feet north of the park entrance for 0.95 mile south to New Years Creek Road. A spur line of about 900 feet would run under the entrance road to the Año Nuevo State Park to facilitate the location of a distributed antenna system (DAS) antenna node on existing poles.

The changes to the proposed project are summarized in Table 2-1.

**Table 2-1
Proposed Changes**

Project Element	Proposed Project	Proposed Realignment	Net Change
Aerial Construction (miles)	12.8 miles	10.76 miles	-2.04
Replacement Poles (number)	14 poles	14 poles	None
Guy Wires (number)	On up to 70 poles	On up to 70 poles	None
Underground Construction (miles)	1.4 miles	3.46 miles	+2.06 miles
Vaults (number)	7	16	+9
Entry/Exit Pits (number)	27	61	+34
DAS Antenna (number)	10	10	None

The proposed realignment would increase the amount of HDD by about 2.06 miles, with a related addition of approximately 9 new vaults and 34 entry/exit pits, requiring

Final Initial Study and Negative Declaration for Crown Castle NG West Inc.

an additional 17 days of HDD activity, an additional day of vault installation activities, and an additional 2 days of cable installation activities. In contrast, the proposed realignment would result in a decrease of 2.04 miles of overhead cable installation activities and reduce activities associated with aerial cable installation activities by approximately 5 days. However, the overall duration of construction activities would remain about the same, approximately 10 weeks, under the proposed project and proposed realignment. Similarly, the daily intensity of activities (i.e., the maximum number of crews working/pieces of equipment used on any given day) are expected to remain the same. The primary change would be the number of day the HDD crew would be working.

Temporary disturbance related to construction activities (as a consequence of additional entry/exit pits) would result in a net increase in the temporary disturbance footprint of less than 0.59 acre, which would occur within the seaward shoulder of Hwy 1.

- 2-2 The Applicant has requested realignment that would avoid State Park Land; therefore, this comment is moot.
- 2-3 The Applicant has requested realignment that would avoid State Park Land; therefore, this comment is moot.
- 2-4 The Applicant has requested realignment that would avoid State Park Land; therefore, this comment is moot.
- 2-5 The Applicant has requested realignment that would avoid State Park Land; therefore, this comment is moot.

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Comment Letter 3

Jennifer Johnson

From: erika perloff <wildfrog@earthlink.net>
Sent: Friday, April 18, 2014 4:13 PM
To: CrownCastleSanMateoCountyProject
Subject: proposed new lines on San mateo Coast

I would like to make comments about this project:

I am shocked at the change in the view shed by the new lines I have seen in Santa Cruz County. I believe this is a huge visual impact to the scenic coast and will affect how residents and visitors see our landscape. I do not believe that the public was adequately informed about the degree to which the new lines would affect the coastline. Our coast is one of the most pristine in terms of view shed. These lines should be placed underground by the companies that will be making large profits from selling the data access they carry.

3-1

3-2

Erika Perloff
Box 331 Davenport
95017

Erika Perloff
www.erikaperloff.com
erika@erikaperloff.com

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Comment Letter 3

Erika Perloff

April 18, 2014

- 3-1** The commenter generally objects to new lines within Santa Cruz County and claims the public was not adequately informed of the visual impacts. Refer to Section 1.1 and 1.2 for a description of the public noticing that occurred for the proposed project. This comment is not a substantive comment on the information or conclusions contained in the Draft IS/MND for the proposed project (which is not located in Santa Cruz County). The commenter is referred to Section 5.1, Aesthetics, of the IS/ND, which analyses the visual impacts of the proposed project, and Section 5.18, Mandatory Findings of Significance, of the IS/ND, which discusses cumulative impacts.
- 3-2** The commenter suggests that undergrounding the proposed project should be considered. The commenter is referred to Chapter 4.0, Project Description, of the IS/ND. Nearly 3.5 miles of the fiber-optic cable will be placed underground, generally in locations west of Hwy 1 and where existing surface infrastructure is absent. The purpose of the IS/ND is to evaluate the potential environmental impacts of the construction, operation, and maintenance of the proposed project, if approved. When an IS shows that there is no substantial evidence, in light of the whole record before the agency, that a proposed project may have a significant effect on the environment, an ND may be prepared, as is the case here. It is not the function or the purpose of an ND to evaluate alternatives to the proposed project; therefore, this comment is moot.

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Comment Letter 4

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., GOVERNOR

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL DISTRICT OFFICE
45 FREMONT STREET FRONT, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE (415) 904-5260
FAX (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



April 18, 2014

Mr. Jensen Uchida
Crown Castle San Mateo County Project
C/O Dudek
44 Montgomery, Suite 1560
San Francisco, CA 94104

Subject: Draft Initial Study/Mitigated Negative Declaration (IS/MND), Notice of Intent to Adopt an IS/MND for Distributed Antennae Systems Network Facilities, Pescadero, San Mateo County.

Dear Mr. Uchida,

We appreciate the opportunity to provide you with Coastal Commission staff comments on the Draft IS and MND for the Crown Castle NG West Inc., San Mateo County Project (Application No. 13-02-007), prepared by Dudek, and received in our North Central District Office on March 21, 2014. The proposed project site is located within the Coastal Zone; therefore, the proposed project must be consistent with the policies of the County of San Mateo's certified Local Coastal Program (LCP).

Crown Castle (Applicant) proposes to install Distributed Antennae Systems (DAS) facilities that include fiber-optic cable, antennae, nodes, and related facilities along approximately 14.2 miles of existing highway right-of-ways (ROW) primarily located along Highway 1 in San Mateo County. The proposed project comprises 12.8 miles of aerial fiber-optic cabling placed on existing utility poles and approximately 1.4 miles of new conduit installed underground. The following are Coastal Commission staff's comments on the IS/MND analysis and the proposed project.

Permit Jurisdiction and Consistency with the Local Coastal Program

San Mateo County has a certified Local Coastal Program (LCP) and, as such, is responsible for issuing Coastal Development Permits (CDPs) for development proposals located within the Coastal Zone. It should be noted that County CDP approvals can be appealed to the Coastal Commission for projects that are located westerly of Highway 1; within 100 feet of a wetland or stream; or located 300 feet from a bluff. The IS/MND states that an objective of the proposed project is to provide a means to more efficiently expand wireless service by other carriers in this area through co-location or joint use of facilities. Policies for wireless telecommunications facilities are contained in Chapter 24.5 of the LCP. The proposed project must be in conformity with the LCP with respect to these types of facilities as established by the regulations under Section 6510, 6512.2, 6512.3, 6512.4, and 6512.5 of the LCP.

4-1

Visual

The project proposal includes the installation of ten pole extenders and associated equipment on existing utility poles, thereby creating "node poles". Two antennae would be attached to each of five node poles. Two of the node poles with proposed antennae are located westerly (on the seaward side) of Highway 1. The antennae (DAV12) installed on one of these poles would be visible from Highway 1. The project elements proposed to be located within Pigeon Point Light Station State Historic Park would be seen within views of the coast looking from the access road to the park. The IS/ND does not include a photo

4-2

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simulation for the proposed project at these locations. Although the fiber-optic cable would be placed on the existing poles, simulations (as was done for the three other “key observation points”, on the seaward side of Highway 1) would be helpful in fully evaluating the visual effects on the views of the coast from the Pigeon Point State Park parking lot. 4-2 contd

The IS/MND includes a project objective to allow opportunities for future co-location of telecommunication facilities. The cumulative impacts analysis section of the IS/MND contains a discussion of cumulative biological impacts to Monterey pine trees; however there is no discussion of the potential for cumulative visual impacts from the proposed project. A qualitative discussion of which locations along the proposed project alignment for the new facility would most likely be utilized in the future for the co-location of telecommunications facilities should be incorporated into the IS/MND. The visual impacts of further add-ons to existing utility poles, in particular the poles that can be seen from Highway 1 and the Pigeon Point Light Station State Historic Park access road, must be further assessed for cumulative visual resource impacts. 4-3

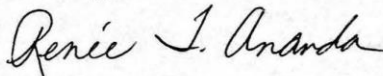
Biological Resources

The proposed project includes work to string fiber-optic cable across Año Nuevo Creek, Gazos Creek, and Whitehouse Creek in order to attach the cable to existing utility poles that are “at least 60 feet from the banks” of these creeks. The author states in the IS/MND that the proposed project would not undertake any activities in either riparian corridors or wetlands as defined and protected in the LCP; and with the integration of the protective measures APM-APM-BIO-1, APM-BIO-2, APM-BIO-3, and APM-BIO-4, impacts to sensitive resources would be less than significant. A map of these resources relative to the proposed work, including staging areas, should be included in the document to fully demonstrate whether or not the proposed work would cause significant impacts. 4-4

Coastal Commission staff suggests that APM-BIO-4 (measures to minimize impacts to California red-legged frog, San Francisco garter snake, and western pond turtle) should include the additional option of using exclusion fencing for the protection of red-legged frog and San Francisco garter snake. 4-5

Please feel free to contact me regarding this matter. You can reach me by telephone at 415-904-5260; in writing at the address listed in the letter head; or via e-mail at rananda@coastal.ca.gov.

Sincerely,



Renée T. Ananda
Coastal Program Analyst

Final Initial Study and Negative Declaration for Crown Castle NG West Inc.

Comment Letter 4

California Coastal Commission
April 18, 2014

- 4-1** The commenter noted that, when relevant to the issue area being analyzed, the Local Coastal Program policies were included in the regulatory setting section of each chapter of the IS/ND. Furthermore, Table 5.10-1 in Section 5.10, Land Use and Planning, presents a consistency analysis of the relevant land use policies, including Chapter 24.5 (i.e., Sections 6510 et seq. of the San Mateo County zoning regulations), that address wireless fiber-optics facilities.

When reviewing the Draft IS/MND, the California Public Utilities Commission (CPUC) noticed that Section 8.22, Utilities in State Scenic Corridors, from the San Mateo County Local Coastal Program was mistakenly included in the Regulatory Setting of the Aesthetic section. Based on further review, the CPUC determined that Section 8.22 of the Local Coastal Program does not apply to the proposed project, but it is more appropriate to rely on Section 6512.2, Development and Design Standards for New Wireless Telecommunication Facilities that are not Co-Location Facilities. This interpretation is consistent with San Mateo County Resolution No. 639809, which enacted Section 6510 et seq. of the San Mateo County zoning regulations in 2008, which noted that the “[Local Coastal Program] does not currently contain regulations specific to the construction, expansion, and operation of fiber-optics facilities.”

- 4-2** Please refer to Comment Response 2-1, which notes that since publication of the Draft IS/MND, the Applicant has proposed realignment of the proposed project to avoid State Park lands; therefore, this comment is moot.
- 4-3** One of the proposed project objectives is to provide a means to more efficiently expand wireless service by other carriers through co-location or joint use of certain facilities. The means would be through co-use of the fiber-optic cable by other carriers for future projects. However, there are no such projects that are reasonably foreseeable or that can be meaningfully analyzed in the cumulative scenario. As mentioned in Section 5.18, discussions with County of San Mateo, Caltrans, and State Parks did not reveal any reasonably foreseeable future projects that would contribute to impacts discussed in the IS/ND. The objective regarding the potential for future co-location and joint use of facilities is in reference to the potential to share the proposed

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facilities with other communications companies, not necessarily to construct additional poles or lines within the ROW.

For these reasons, analysis regarding potential visual impacts of future “add-ons” to the utility corridor would be speculative in nature; therefore, further analysis is not required under the California Environmental Quality Act (CEQA).

To clarify this point, the following text has been added to the IS/ND (Section 5.18, Mandatory Findings of Significance):

One of the proposed project objectives is to “provide a means to more efficiently expand wireless service by other carriers in this area through co-location or joint use of certain facilities.” Based on the proposed project design, it is likely that only the fiber-optic cable could be used by another telecommunications carrier in the future.

- 4-4** The commenter requests the inclusion of maps that demonstrate the avoidance of wetland and riparian features by construction activity. Maps identifying Lucerne Lake, Año Nuevo Creek, Gazos Creek, Whitehouse Creek, and other wetland and riparian features along the proposed project alignment were plotted in conjunction with ground-disturbing activity that would be within 200 feet of a riparian or wetland features. As indicated in Attachment C, Figure C-1, key ground-disturbing project features such as HDD boring entry and exit pits would occur in the shoulder of Hwy 1 and at least 60 feet outside of creeks and riparian features. Figures C-2a and C-2b in Attachment C show the location of replacement poles where known; again, poles are located outside of the riparian buffer. It should be noted that access to existing poles in riparian willow habitat may be necessary for fiber-optic cable placement and guying; however, all of such work would be carried out on foot and result in no permanent disturbance.
- 4-5** The commenter suggests the use of exclusion fencing for the protection of California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*). The use of such a measure would be neither practical nor effective at reducing the potential impacts to these sensitive species. Proposed project construction would not be static, and activity at most locations would be no more than a few hours long, as the fiber-optic line is strung and tensioned mostly from bucket truck or on foot. In these situations, installation of netting would increase the residence time of workers at a particular location, potentially exacerbating risks to sensitive species. Furthermore, because of the linear nature of the proposed project, use of netting could be counterproductive and increase the risk by impeding

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movement of sensitive species through the site. Therefore, for the previously stated reasons, construction activities netting is not recommended. Excavation for HDD access pits and trenching activities are potentially hazardous to sensitive species, as the excavations may trap individuals. Since none of these activities would occur within wetlands, the only potential risk would be impeding the movement of these species during upland dispersal. However, all trenching and boring activities would occur outside mapped critical habitat and within existing roadways or on the road shoulder. Covering excavations when not in use, as described in Applicant Proposed Measure- (APM-) BIO-4, would be adequate to avoid impacts to these species. Therefore the risk to red-legged frog and San Francisco garter snake movement would be less than significant, and no further mitigation is required.

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5 MITIGATION MONITORING PLAN

5.1 Summary

Crown Castle NG West Inc. (Crown Castle) proposes to construct, operate, and maintain the proposed project. An IS was prepared to assess the proposed project's potential environmental effects. The IS was prepared based on information in the Proponent's Environmental Assessment, project site visit, and supplemental research. The majority of the proposed project's impacts would occur during project construction. Within Crown Castle's application, APMs proposed by Crown Castle as project design features were proposed to reduce potentially significant adverse impacts related to project implementation.

The purpose of this Mitigation Monitoring Plan (MMP) is to ensure effective implementation of each APM as well as the mitigation measure identified by the IS and imposed by the CPUC as part of project approval. Table 3-1, along with the full text of the mitigation measure, will form the basis for implementation of this program. Table 3-1 has been updated in the Final IS/ND to clarify compliance documentation and consultation, the responsible party, and location of the project component for implementation of each APM.

This MMP shown in Table 3-1 includes the following:

- The APMs that Crown Castle must implement as part of the proposed project
- The compliance documentation and consultation required to implement these measures
- The timing of implementation for each measure
- The responsible party and location of project component for implementation of each measure

The CPUC will use this MMP as the framework for a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). The MMCRP will be created by the CPUC to formalize protocols to be followed prior to and during construction by CPUC third-party environmental monitors (CPUC EMs) and Crown Castle project staff. The MMCRP will include the following topics:

- Agency Jurisdiction
- Roles/Responsibilities
- Communication
- Compliance Verification and Reporting
- Project Changes

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

Final language of the MMCRP will be made in consultation with Crown Castle. Drafted language for minor project changes and dispute resolution protocols are provided in the following paragraphs.

5.2 Minor Project Changes

The CPUC Energy Division may approve requests by Crown Castle for minor project refinements that meet the fixed criteria described in the following paragraphs and that may be necessary to complete the project due to final engineering or other reasons. Minor project refinements cannot create a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the thresholds used in the environmental document. Minor project refinements cannot require new conditions for approval. Without approval, the proposed refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact. Minor project refinements cannot conflict with any mitigation measure, applicable law, or policy, or trigger an additional permit requirement. Specifically, minor project refinements must not change mitigation measures. Minor project refinements must be located within the geographic boundary of the study area of this IS/ND. If approved, Crown Castle shall seek any other project refinements by a petition to modify the decision.

A proposed project change that has the potential to create significant environmental effects will be evaluated to determine whether a petition to modify and/or a supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, APMs, and correction of such deviation will be reported immediately to the CPUC project manager for his or her review. The CPUC monitoring team will review the minor project change request to ensure that all 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 need additional information to process the minor project change. In some cases, project refinements may also require approval by jurisdictional agencies. In general, a minor project change request must include the information in the following list.

- Detailed description of the location, including maps, photos, and/or other supporting documents

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- Information describing how the minor project change request deviates from a project requirement
- Biological resource surveys or verification that no biological resources would be significantly impacted
- Cultural resource surveys or verification that no cultural resources would be significantly impacted
- Agency approval (if necessary)

5.3 Dispute Resolution

It is expected that the MMP will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur.

Issues should be addressed first at the field level informally between the CPUC EMs and Crown Castle's EMs at the regular progress meetings. Questions may be raised to the Crown Castle project environmental manager or Crown Castle project construction manager. Should the issue persist or not be resolved at these levels, the following procedures will be used:

- **Step 1.** Disputes unresolved in the field and complaints (including those from the public) should be directed to the CPUC project manager for resolution. The project manager will attempt to resolve the dispute informally. Should this informal process fail, the CPUC project manager will inform Crown Castle prior to initiating Step 2.
- **Step 2.** Should this informal process in the field fail, the CPUC project manager may issue a formal letter requiring corrective actions to address the unresolved or persistent deviations from the proposed project or adopted MMP.
- **Step 3.** If a dispute or complaint regarding implementation or evaluation of the program, or mitigation measures cannot be resolved informally or through a letter request, any affected participant in the dispute or complaint may file a written Notice of Dispute with the CPUC's executive director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the executive director or designee(s) shall meet or confer with the filer and other affected participants to resolve the dispute. The executive director shall issue an Executive Resolution describing his/her decision, and serve it to 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 Executive Resolution, such party(ies) may appeal it to the CPUC via a procedure to be specified by the CPUC.

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

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**Table 3-1
Mitigation Monitoring Program**

APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
<i>Aesthetics</i>				
APM-AES-1	Keep construction and staging areas orderly, free of trash and debris, and restore areas disturbed by project construction along the proposed route to their pre-project condition.	a. CPUC monitor: line item in compliance monitoring report	a. During construction	Crown Castle and CPUC * Applicable to all project components
APM-AES-2	<ul style="list-style-type: none"> • Identify and comply with local regulations and requirements concerning architectural design; • Design project facilities to be unobtrusive and to not conflict with the character of the surrounding setting; restore conduit installation sites to pre-construction conditions; and • Prior to construction, consult with the local agencies associated with each project area regarding the appropriate architectural design practices that will be implemented before, during, and after construction. 	a. CPUC monitor: line item in compliance monitoring report	a. Prior to construction	Crown Castle and CPUC * Applicable to all aboveground project components
APM-AES-3	As part of its standard construction operating procedure, ensure that construction lights will be directed away from the visual field of motorists and pedestrians along any streets or right-of-ways.	a. CPUC monitor: line item in compliance monitoring report	a. During construction	Crown Castle and CPUC * Applicable to all project components
<i>Air Quality</i>				
APM AQ-1	<p><i>Implement BAAQMD [Bay Area Air Quality Management District] basic construction measures to reduce dust emissions</i></p> <ul style="list-style-type: none"> • Crown Castle will require all construction contractors to implement the following BAAQMD emission reduction measures to reduce dust emissions. 	CPUC monitor: line item in compliance monitoring report	During construction	Crown Castle and CPUC * Applicable to all project components

¹ All compliance documentation and consultation records to be available for CPUC staff review upon request.

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<ul style="list-style-type: none"> ○ All vehicle speeds on unpaved roads shall be limited to 15 mph. ○ Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations. 			
APM AQ-2	<p><i>Implement BAAQMD basic construction measures to reduce exhaust emissions</i></p> <p>Crown Castle will require all construction contractors to implement the following BAAQMD emission reduction measures to reduce exhaust emissions.</p> <ul style="list-style-type: none"> • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 	CPUC monitor: line item in compliance monitoring report	During construction	Crown Castle and CPUC * Applicable to all project components
<i>Biological Resources</i>				
APM-BIO-1	<i>Conduct spring surveys for special-status plants within</i>	<ul style="list-style-type: none"> a. Biologist qualifications b. Conduct special-status 	<ul style="list-style-type: none"> a. Prior to construction b. Prior to construction during 	Crown Castle and CPUC

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**Table 3-1
Mitigation Monitoring Program**

APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<p><i>the project area</i></p> <ul style="list-style-type: none"> • Prior to construction, a qualified botanist will complete spring surveys for special-status plants within the project area to determine the presence or absence of special-status plants. The survey will be completed by qualified botanists and will be conducted during the appropriate period(s) necessary to observe special-status plants known to occur in the region. • If a population of a special-status plant species occurs within the project area, the population will be clearly staked and flagged in the field by a qualified botanist prior to construction so the population can be avoided. If the population cannot be avoided during construction, Crown Castle will minimize impacts by reducing the work area to the smallest area necessary to complete the work. Crown Castle will conduct project activities and necessary ground disturbance in a manner that is consistent with the successful reestablishment of the species to the extent feasible. The specific actions necessary will depend on the biology of the species, and will be determined through consultation with the USFWS and CDFW. Generally actions include waiting for the plant species to go to seed and collecting the seed for future planting and saving the top 6 inches 	<p>plants spring survey c. Document survey results d. Flag known populations of special-status plants e. If avoidance is not feasible, Applicant to consult with USFWS (U.S. Fish and Wildlife Service) and/or CDFW (California Department of Fish and Wildlife) to determine appropriate actions to ensure successful re-establishment of species to the extent feasible.</p>	<p>appropriate period c. Prior to construction d. Prior to and during construction e. Prior to and during construction</p>	<p>* Applicable to all project components</p>

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**Table 3-1
Mitigation Monitoring Program**

APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	of top soil (which contains the seed bank) separate from other excavated soil.			
APM-BIO-2	<p><i>Conduct a preconstruction nesting survey to minimize impacts to nesting birds and raptors (February through August)</i></p> <ul style="list-style-type: none"> If the proposed project is completed outside of the nesting season of birds, no additional measures will be necessary. If construction will take place during the nesting season (generally February through August) Crown Castle will conduct preconstruction nesting bird surveys. If an active nest is identified during the surveys, Crown Castle, in consultation with CDFW and USFWS, will establish a no-construction zone until the breeding season is completed or subsequent bird/raptor surveys confirm that all offspring have fledged and no new nests have been established. Generally, these no construction zones are 50 feet for passerine birds and 250 feet for raptors. 	<p>a. Biologist qualifications b. Conduct nesting bird survey c. Monitoring active nests on daily basis within buffer areas (see e) d. Document monitoring efforts in daily log and report to CPUC at the end of each week e. Applicant to consult with USFWS and/or CDFW to review and approve/deny decreases in buffer space</p>	<p>a. Prior to construction b. Survey no more than 72 hours prior to construction c. During construction d. During construction e. Prior to or during construction</p>	<p>Crown Castle and CPUC * Applicable to all project components</p>
APM-BIO-3	<p><i>Conduct preconstruction survey to minimize impacts to wintering monarch butterflies for construction in late fall and winter months</i></p> <ul style="list-style-type: none"> If the proposed project is scheduled to occur during the late fall and winter months and trimming of eucalyptus trees is required, a biologist will conduct a preconstruction survey to determine if the trees that require trimming and the surrounding trees support overwintering clusters of monarch butterflies. If 	<p>a. Biologist qualifications b. Conduct wintering monarch butterflies survey c. Document survey efforts in daily log and report to CPUC at the end of each week d. Documentation of monitoring active nests on daily basis within buffer areas</p>	<p>a. Prior to construction b. Survey no more than 72 hours prior to construction c. Prior to construction d. During construction e. Prior to or during construction</p>	<p>Crown Castle and CPUC * Applicable to all project components proximate to eucalyptus trees proposed to be trimmed</p>

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	clusters of monarch butterflies are present, Crown Castle, in consultation with CDFW, will establish a no construction zone until after the monarch butterflies have migrated. Generally, this no construction zone is 30 feet from wintering monarch butterflies.	e. CPUC to consult with USFWS and/or CDFW to review and approve/deny decreases in buffer space		
APM-BIO-4	<p><i>Measures to minimize impacts to California red-legged frogs, San Francisco garter snakes, and western pond turtles</i></p> <ul style="list-style-type: none"> • Work should be avoided from October 16 (or the first measurable rainfall of 1 inch or greater) to May 14. If work cannot be avoided during this period then it is recommended that a qualified biological monitor be present for all ground-disturbing activities. • It is recommended that a qualified biologist familiar with California red-legged frogs, San Francisco garter snake, and western pond turtle conduct a preconstruction survey immediately prior to construction in areas where ground disturbance will occur. During the preconstruction survey, the biologist will also look for and identify burrows that could be used by California red-legged frogs. These areas will be flagged (as practical) for avoidance. The biologist will remain onsite for the duration of any construction activities involving excavation or the use of heavy machinery or equipment. 	<ul style="list-style-type: none"> a. Biologist qualifications b. Conduct pre-construction survey in areas where ground disturbance will occur c. Flag burrows that could provide habitat d. Monitor during all ground-disturbing activities e. Document monitoring efforts in daily log and report to CPUC at the end of each week f. Conduct and document worker environmental awareness training 	During construction	Crown Castle and CPUC *Applicable to all project components requiring earth-disturbing activities

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<p>Prior to work the construction crew will receive worker environmental awareness training. Training will include review of environmental laws and protective measures that must be followed by all personnel to reduce or avoid effects on protected species during construction activities.</p> <ul style="list-style-type: none"> • Any holes, trenches, pits, and/or tanks that are left open overnight will either be covered to prevent entry or one side will be sloped to allow wildlife to escape. Open holes, trenches, pits, and/or tanks left overnight will be checked by a qualified biologist at the start of construction each day to determine whether trapped wildlife are present. If wildlife are present, they will be removed by the biologist before the hole, trench, or pit is filled. • Plastic monofilament netting (erosion control matting) or similar material containing netting will not be used at the project. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds. • Handling of California red-legged frogs is prohibited without a valid federal take permit and handling of San Francisco garter snakes is prohibited without a valid federal take permit and a CESA Section 2081 Incidental Take Permit. Any California red-legged frogs or San Francisco garter snakes observed on the work 			

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<p>site will be allowed to move offsite on their own.</p> <p>If California red-legged frogs, San Francisco garter snakes, and western pond turtles are observed on or adjacent to the work site, and are in danger of injury, construction in the vicinity will cease until no danger exists for California red-legged frogs or San Francisco garter snakes.</p>			
<i>Cultural Resources</i>				
APM-CUL-1	<ul style="list-style-type: none"> • If buried cultural resources, such as chipped or ground stone, historic debris, building foundation, or human bone, are inadvertently discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate measures in consultation with the CPUC, State Historic Preservation Officer, and other appropriate agencies. • In the event that fossil remains are encountered, either by the cultural resources monitor or by construction personnel, qualified paleontological specialists will be contacted. Construction within 100 feet of the find in non-urban areas and 50 feet in urban areas will be temporarily halted or diverted until a qualified vertebrate paleontologist examines the discovery. 	<p>a. Notification to CPUC of potential discovery and stop work (email)</p> <p>b. Archeologist and paleontologist qualifications</p> <p>c. Notification that identifies the process that will be implemented to address the unanticipated discovery as well as a map indicating where cultural and/or paleontological monitoring will be required</p> <p>d. Document appropriate coordination</p> <p>e. CPUC monitor: line item in compliance monitoring report</p>	<p>a. Within 1 hour of potential discovery</p> <p>b. Prior to construction</p> <p>c. Within 1 day of unanticipated discovery</p> <p>d. Within 1 day of coordination</p> <p>e. During construction</p>	<p>Crown Castle and CPUC</p> <p>*Applicable to all project components requiring earth-disturbing activities</p>

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Mitigation Monitoring Program**

APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
<i>Greenhouse Gas Emissions</i>				
APM GHG-1	<p><i>Implement BAAQMD Best Management Practices [BMPs] to reduce GHG emissions</i></p> <p>To ensure that short-term GHG emissions are reduced as much as feasible and the proposed project does not result in a considerable contribution to GHG levels, Crown Castle will require all construction contractors to implement the following GHG emission reduction measures to the extent they are feasible.</p> <ul style="list-style-type: none"> • Using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment of at least 15% of the fleet. • Recycling or reusing at least 50% of construction waste or demolition materials. 	<p>a. Implement BMPs as defined</p> <p>b. CPUC monitor: line item in compliance monitoring report</p>	During construction	Crown Castle and CPUC *Applicable to all project components
<i>Hazards and Hazardous Materials/Fire Safety</i>				
APM-HAZ-1	<ul style="list-style-type: none"> • Ensure proper labeling, storage, handling, and use of hazardous materials in accordance with best management practices and the Occupational Safety and Health Administration's HAZWOPER requirements. • Ensure that employees are properly trained in the use and handling of hazardous materials and that each material is accompanied by a material safety data sheet. • Any small quantities of hazardous materials stored temporarily in staging areas will be stored on pallets within fenced and secured areas and protected from exposure to weather. Incompatible materials will be stored separately, as appropriate. 	<p>a. Implement BMPs as defined</p> <p>b. CPUC monitor: line item in compliance monitoring report</p>	During construction	Crown Castle and CPUC *Applicable to all project components

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Mitigation Monitoring Program**

APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<ul style="list-style-type: none"> • All hazardous waste materials removed during construction will be handled and disposed of by a licensed waste disposal contractor and transported by a licensed hauler to an appropriately licensed and permitted disposal or recycling facility, to the extent necessary to ensure the area can be safely traversed. • Significant releases or threatened releases of hazardous materials will be reported to the appropriate agencies. 			
<i>Hydrology and Water Quality</i>				
APM-HYD-1	<p>Prior to non-storm discharges into surface waters, provide documentation of obtaining all necessary and applicable approvals, including the following:</p> <ul style="list-style-type: none"> • Implementation of appropriate Best Management Practice (BMP's) to minimize the potential for storm-water pollutants. These BMPs may include, but not necessarily be limited to, the utilization of settling ponds or screens to reduce suspended sediment loads 	<p>a. Implement BMPs as defined and incorporate commitments into construction contracts b. CPUC monitor: line item in compliance monitoring report</p>	Prior to and during construction	<p>Crown Castle and CPUC</p> <p>*Applicable to all earth-disturbing activities</p>
APM-HYD-2	<p>Erosion Controls:</p> <ul style="list-style-type: none"> • Excavated or disturbed soil will be kept within a controlled area surrounded by a perimeter barrier that may entail silt fence, hay bales, straw wattles, or a similarly effective erosion control technique that prevents the transport of sediment from a given stockpile. • All stockpiled material will be covered or contained in such a way that eliminates off-site runoff from occurring. 	<p>a. Implement BMPs as defined and incorporate commitments into construction contracts b. CPUC monitor: line item in compliance monitoring report</p>	During construction	<p>Crown Castle and CPUC</p> <p>*Applicable to all project components</p>

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<ul style="list-style-type: none"> Upon completion of construction activities, excavated soil will be replaced and the area restored to pre-construction conditions. 			
<i>Land Use</i>				
APM-LU-1	<p>Submit written documentation, including evidence of review by the appropriate public works, planning, and/or community development agency for the applicable jurisdictions. This documentation will include the following:</p> <ul style="list-style-type: none"> Site plan showing the dimensions and location of the finalized alignment; Evidence that the project meets all necessary requirements; Evidence of compliance with design standards; Copies of any necessary permits or conditions of approval; and Records of any discretionary decisions made by of the applicable jurisdictions. 	<p>a. Submit evidence of compliance b. CPUC monitor: line item in compliance monitoring report</p>	Prior to construction	Crown Castle and CPUC *Applicable to all project components
<i>Noise</i>				
APM-NOI-1	<ul style="list-style-type: none"> Require construction contractors to comply with the construction-hour limitations and construction equipment standards set forth by each local jurisdiction. All equipment will have sound-control devices no less effective than those provided on original equipment; No equipment will have an unmuffled exhaust; Construction equipment will be located as far from 	<p>a. Implement BMPs as defined and incorporate commitments into construction contracts b. CPUC monitor: line item in compliance monitoring report</p>	During construction	Crown Castle and CPUC *Applicable to all project components

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<p>sensitive receptors (e.g., residences, schools, places of worship, and hospitals) as possible; and</p> <ul style="list-style-type: none"> • If traffic control devices requiring electrical power are employed within 500 feet of sensitive receptors, the devices will be battery/solar powered instead of powered by electrical generators. <p>In addition, implement a variety of measures to reduce noise levels from directional boring where noise levels of 60 dBA [A-weighted decibel] or greater will be experienced at sensitive receptor locations. For example:</p> <ul style="list-style-type: none"> • Special mufflers can be applied to the boring rig exhaust; • Shielding can be erected between the noise source and the receptor; or • As an extreme measure, a temporary enclosure can be erected to house the boring operation. <p>Implement all reasonable and customary noise reduction measures and post the name and telephone number of a person for the public to contact to resolve noise-related problems.</p>			
<i>Traffic</i>				
APM-TRA-1	<ul style="list-style-type: none"> • As deemed necessary by the applicable jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. • Identify all roadway locations where special construction techniques (e.g., directional drilling or 	<p>a. Traffic Control Plan, if required</p> <p>b. CPUC monitor: line item in compliance monitoring report</p>	<p>Prior to and during construction</p>	<p>Crown Castle and CPUC</p> <p>*Applicable to all project components</p>

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Mitigation Monitoring Program**

APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	<p>night construction) will be used to minimize impacts to traffic flow.</p> <ul style="list-style-type: none"> • Develop circulation and detour plans to minimize impacts to local street circulation. This will include the use of signage and flagging to guide vehicles through and/or around the construction zone. • Schedule truck trips outside of peak morning and evening commute hours. • Limit lane closures during peak hours to the extent possible. • Use haul routes minimizing truck traffic on local roadways to the extent possible. • Include detours for bicycles and pedestrians in all areas potentially affected by project construction. • Install traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. • Store construction materials only in designated areas. • Coordinate with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. 			
APM-TRA-2	<p>To avoid impeding emergency vehicle traffic around the construction activities, develop an Emergency Vehicle Access Plan that includes the following:</p> <ul style="list-style-type: none"> • Evidence of advanced coordination with emergency service providers, including but not necessarily 	<p>a. Emergency Vehicle Access Plan b. CPUC monitor: line item in compliance monitoring report</p>	Prior to and during construction	Crown Castle and CPUC * Applicable to all project components

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APM Number	Applicant Proposed Measure	Compliance Documentation ¹ and Consultation	Timing	Responsible Party and Project Components
	limited to police departments, fire departments, ambulance services, and paramedic services; <ul style="list-style-type: none"> • Emergency service providers will be notified of the proposed project locations, nature, timing, and duration of any construction activities, and will be asked for advice about any road access restrictions that could impact their response effectiveness; and • Project construction schedules and routes designed to avoid restricting movement of emergency vehicles to the best extent possible. Provisions to be ready at all times to accommodate emergency vehicles at locations where access to nearby properties may be blocked. Provisions could include the use of platings over excavations, short detours, and/or alternate routes. 			
APM-TRA-3	Prepare and implement a traffic safety plan and coordinate with local transportation and emergency response agencies to avoid potential roadway safety hazards.	a. Traffic Safety Plan b. CPUC monitor: line item in compliance monitoring report	Prior to and during construction	Crown Castle and CPUC *Applicable to all project components
APM-TRA-4	Limit all parking to right-of-way and pre-approved staging areas to address the increased parking demand created by construction activities.	CPUC monitor: line item in compliance monitoring report	During construction	Crown Castle and CPUC *Applicable to all project components
<i>Utilities and Service Systems</i>				
APM-USS-1	Recycle and dispose of construction materials to minimize generation of solid waste resulting from construction activities.	CPUC monitor: line item in compliance monitoring report	During construction	Crown Castle and CPUC *Applicable to all project components

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