CONSTRUCTION MONITORING, COMPLIANCE AND REPORTING PLAN

AT&T Riverside 1 Project

Prepared for

California Public Utilities Commission

Submitted by

Aspen environmental group

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ACRONYMS

CEQA	California Environmental Quality Act
CM	Construction Manager
CMCRP	Construction Monitoring, Compliance, and Reporting Program
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
DF	Design Feature
ECM	Environmental Compliance Manager
EM	Environmental Monitor
FFA	Federal Funding Account
LEM	Lead Environmental Monitor
MPR	Minor Project Refinement
NTP	Notice to Proceed
PFM	Petition for Modification
PM	Project Manager
SB	Senate Bill
SR	State Route
WEAP	Worker Environmental Awareness Program

1. INTRODUCTION

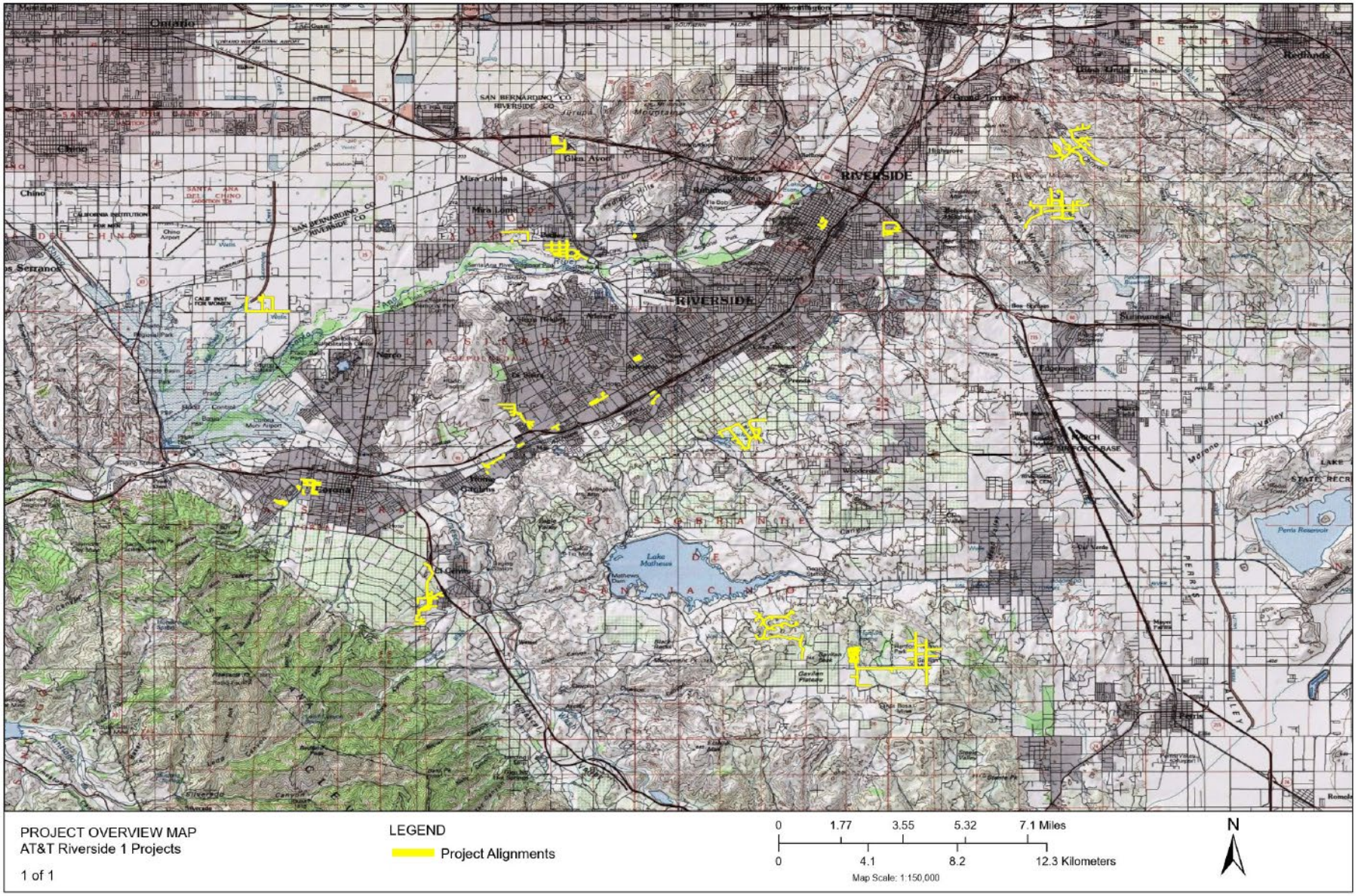
AT&T's Riverside 1 Project (Project) is an approved broadband project located in several cities and unincorporated areas of Riverside County. The project alignment includes the cities of Corona, Eastvale, Jurupa Valley, and Riverside (Figure 1). Major roadways include Border Avenue, El Cerrito Road, Chandler Street, Limonite Avenue, Indiana Avenue, Multiview Drive, Idaleona Road, and Mt. Vernon Avenue. AT&T proposes to deploy approximately 114 miles of underground or aerial fiber. The Project was included in the approval of six projects in the California Public Utilities Commission (CPUC) Resolution T-17907 that authorized the release of Federal Funding Account (FFA) grant funding as a California Environmental Quality Act (CEQA) Exemption with conditions on March 19, 2026. The FFA, administered by the CPUC, is a $2 billion grant program for last-mile broadband infrastructure projects to connect unserved Californians in accordance with 2021's Senate Bill 156 (Chapter 112, Statutes of 2021). Before authorizing funding for the construction of FFA Account projects, CPUC must determine that the CEQA compliance has been met.

On June 30, 2025, Governor Gavin Newsom signed California Senate Bill (SB) 131 (Statutes 2025, Chapter 24) CEQA Statutory Exemption which included a requirement that "the project incorporates, as a condition of approval, measures developed by the Public Utilities Commission, the Department of Transportation, or the city, county, or city and county responsible for the right-of-way to address potential environmental impacts. At minimum, the project shall be required to include monitors during construction activities and measures to avoid or address impacts to cultural and biological resources" (Public Resources Code Section 21080.51). These measures were included in CPUC Resolution T-17907. For the purposes of this Project, the environmental protection measures are the same as the Project Design Features and the terms are used interchangeably. This Construction Monitoring, Compliance, and Reporting Program (CMCRP) provides a summary of these conditions and measures and provides a framework to ensure that all required environmental protection measures are implemented and completed according to schedule and maintained in a satisfactory manner during the construction and operation of the Project, as required.

The CMCRP also provides guidelines and standardizes procedures for environmental compliance on the Project. These procedures have been developed by the CPUC, in coordination with AT&T, to help define reporting relationships, provide detailed information about the roles and responsibilities of the Project's environmental compliance team members, define compliance reporting procedures, and establish communication protocol.

The CMCRP will be implemented until the final monitoring and reporting procedures identified in this report have been completed to the CPUC's satisfaction.

Figure 1. Riverside 1 Project Location



1.1. Project Overview

The Project includes the installation of aerial fiber that would be placed on existing poles, where possible, which would include lashing fiber to existing AT&T strands and attachments. Where buried (i.e., existing conduit not present) or underground (i.e., existing conduit present) fiber would be installed, directional boring, microtrenching, and/or open trenching methods would be used.

For aerial installation, a bucket truck will be used to access poles for attaching fiber to existing or proposed poles, with the truck pulling off the traveled way to the extent practicable to perform the work. The work area would be approximately 10-foot-wide by 20-foot-long at each pole. Where bucket-truck access is not feasible, or where environmentally sensitive areas limit vehicle access, aerial fiber will be installed by a crew member on foot. Where pole locations are within approximately 10–12 feet of the travel lane, the adjacent lane may be used as a temporary staging/work area, with appropriate traffic control implemented as needed.

For open-trench installation, the work area is anticipated to extend approximately 10 feet in width along the alignment. For directional drilling, each bore pit will include an approximately 10-foot-wide by 20-foot-long staging/work area for drill setup and associated operations. Ancillary support equipment (e.g., crew vehicles, bucket trucks, and vacuum trailers) will be positioned on the roadway/shoulder in the vicinity of active work areas.

Vegetation clearance may be required at ground-disturbing work locations, including open excavations (e.g., trenching), proposed pole locations, proposed access points (handholes/vaults), and bore pits. Excavated material will be returned to the excavation and compacted to restore original grade. Any surplus soil will be hauled offsite and disposed of at an approved facility.

Construction staging areas will occur within temporary areas along the project alignment. Staging areas are locations where construction equipment and materials may be temporarily stored, and the size of each staging area will vary. Staging locations will be identified in coordination with the applicable jurisdictional agency representative and the contractor, and will be sited on existing roads, pullouts, road shoulders, or other previously disturbed/agency-approved locations. The main material storage and equipment staging area will be at the AT&T construction yard located at 3073 Adams Street, Riverside, California.

All disturbed areas will be restored to their original or better condition and returned to pre-construction conditions. Restoration will include returning soils/surfaces to original contour/grade as applicable and restoring affected improvements (e.g., pavement, sidewalk, or vegetation). Work area clean-up will occur immediately behind construction activities. Pavement disturbed by construction will be sawcut to neat lines, repaired, and restored to its pre-construction condition (or better) in accordance with the encroachment permit requirements and the local agency's standard specifications.

1.1.1. Construction Schedule

AT&T will begin work within 14 days of a CPUC authorized Notice to Proceed (NTP), with multiple NTPs anticipated for segments of the Project, and has indicated that they can begin work in September 2026. AT&T expects to complete the construction within approximately 10 to 12 months following the NTP. Depending on rates of construction production, this timeline may contract or expand. Typical construction hours will be Monday through Friday, eight hours per day.

2. CONSTRUCTION MONITORING, COMPLIANCE AND REPORTING PROGRAM

This CMCRP with a detailed work plan is created to maintain environmental compliance for the Project, including specific protocols, guidelines, and standard procedures for environmental compliance to be followed prior to and during Project construction.

2.1. Purpose

The purpose of the CMCRP is to:

- Ensure effective implementation of the environmental measures adopted by the CPUC;
- Facilitate the monitoring, compliance, and reporting activities of the CPUC;
- Establish lines of communication related to environmental measure monitoring; and
- Provide a method of effectively documenting and reporting compliance with all environmental measures.

2.2. Program Scope

This scope of the CMCRP is to:

1. List environmental protection measures and their monitoring and reporting requirements, as identified in the CPUC Resolution T-17907, Appendix A – Project Design Features (Section 2.2.1);
2. Describe the NTP request and approval procedure (Section 4.1.2);
3. Describe the communication protocols between CPUC, AT&T, and their respective consultants (Sections 4.2);
4. Describe the process by which CPUC staff will observe construction of the Project to ensure implementation of each environmental protection measure (Section 4.3.1);
5. Describe the process for recording “noncompliance” (i.e., evidence that AT&T is not fully implementing each environmental protection measure) (Section 4.3.4).

The Project is subject to environmental protections and conditions of approval described in the CPUC Resolution 1-17907, which are collectively referred to as “environmental measures”. These environmental measures, also called Design Features, were developed through the environmental review process based on currently available information. These Design Features and conditions of approval are listed in Table 2-1 of this CMCRP.

The CMCRP includes provisions for monitoring and reporting: monitoring refers to the ongoing or periodic process by which Project construction and operation are overseen by the Lead Agency. In the case of the Project, monitoring will ensure that AT&T’s compliance with Project measures is checked on a regular basis. Reporting, which comprises written reviews of AT&T’s compliance with the CPUC Resolution T-17907 Environmental Measures, presented to the decision-making body or a designated staff person, ensures that the Lead Agency is informed of AT&T’s compliance with environmental measures. The CPUC guidelines encourage lead and responsible agencies to cooperate in environmental measures monitoring and reporting, where possible.

Throughout the course of Project construction, the protocols, guidelines, procedures, communication lists, and schedules presented in the CMCRP may be revised as needed to address specific day-to-day realities of Project construction.

2.2.1. Implementation

Implementation of the CMCRP will begin during pre-construction and will continue until construction is complete and the CPUC concludes there is no further need for CPUC monitoring of the Project or the CPUC determines implementation of the CMCRP is no longer necessary.

The CMCRP may be modified by the CPUC during project implementation, as necessary, in response to changing conditions or other Project refinements. A copy of the environmental measures should be kept with each crew working on the Project, and all supervisory staff working on the Project should be familiar with its contents.

Table 2-1 has been prepared to assist the responsible parties in implementing the CMCRP. This table identifies individual Design Features, monitoring and reporting procedure, implementation timing, responsible agency for implementing the measure, and comment space to confirm implementation of the environmental measures. The numbering of the Design Features follows the numbering sequence in the CPUC Resolution T-17907 - Appendix A.

The column categories identified in the CMCRP table (Table 2-1) are described below.

- Environmental Measure/Design Feature – This column lists the Design Feature by number.
- Monitoring and Reporting Requirements – This column list the tasks and requirements for AT&T.
- Monitoring Location, Timing and Frequency – This column lists the activity to be monitored for each environmental measure, the timing of each activity, and the frequency/schedule of monitoring for each activity.
- Implementation Responsibility – This column provides the agency responsible for oversight of the environmental measure.
- Effectiveness Criteria – This column identifies the effectiveness criteria used to measure compliance with the requirements of the Design Feature.
- Comments – this column provides space for written comments, if necessary.

Table 2-1. Riverside 1 Project Design Features and Preliminary Plan for Monitoring

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
Biological Resources					
DF-1: Biological Monitoring. A biological monitor approved by the California Public Utilities Commission shall be retained by AT&T and shall be present during construction to observe project activities that may adversely affect biological resources. The frequency and duration of monitoring shall be at the discretion of the California Public Utilities Commission upon review of final project construction plans. The biological monitor shall have the authority to stop work if a sensitive biological resource is observed in or near the project alignment and shall report observations of sensitive biological resources to the California Public Utilities Commission immediately. The biological monitor shall coordinate with the California Public Utilities Commission in a manner and frequency determined by the California Public Utilities Commission upon review of final project construction plans, potentially including but not limited to written progress reports and periodic project meetings. The biological monitor shall be retained at least two weeks prior to initial ground disturbance to review final plans and sensitive areas.	Biological monitor to ensure compliance with CPUC Resolution T-17907 measures; coordinate with the CPUC	All construction areas during construction activities; frequency at the discretion of the CPUC	CPUC	Compliance with CPUC Resolution T-17907 environmental measures as approved	Provide biological monitor resumes to CPUC for review and approval at least two weeks prior to initial ground disturbance
DF-2: Identify and Avoid Bird Nests. AT&T shall implement all ground-disturbing activities and activities that would require the use of heavy equipment (i.e., trenching, directional boring) outside of the nesting bird season, which is typically February 1 through August 31, which would avoid potential disturbance of special-status and other native birds that may nest in vegetation types adjacent to the project alignment (e.g., annual grassland, riparian areas). If avoidance of the nesting bird season is determined to be infeasible, AT&T shall retain a qualified biologist to conduct focused surveys for nesting birds prior to implementation of ground disturbing activities during the nesting bird season (February 1 through August 31). The survey shall be conducted within seven days of the start of ground-disturbing activities. The survey shall include the project alignment and accessible areas within 0.5 miles for bald eagle, golden eagle, and Swainson's hawk; 0.25 miles for white-tailed kite; 1,000 feet for coastal California	AT&T to implement avoidance and protection measures	All project areas requiring ground disturbing and heavy equipment activities; prior to and during construction February 1 through August 31	CPUC and CDFW	Avoidance and protection measures are implemented as approved	Conduct focused surveys 7 days prior to the start of ground-disturbing activities and provide results to the CPUC for review

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
gnatcatcher, Least Bell's vireo, and tricolored blackbird; 500 feet for other raptor species and special-status birds; and 50 feet for non-raptor common native bird nests. If active nests are not found, the biologist shall document the findings in a report to AT&T and the California Public Utilities Commission, and no further mitigation shall be required. If active nests are found, impacts on nesting birds shall be avoided by establishing appropriate buffers around active nest sites to prevent disturbance to the nest. Ground disturbing project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. Buffers typically shall be 0.5 miles for bald eagle, golden eagle, and Swainson's hawk; 0.25 miles for white-tailed kite; 1,000 feet for coastal California gnatcatcher, Least Bell's vireo, and tricolored blackbird; and 500 feet for other raptors and other special-status birds. Buffer size for non-raptor bird species shall be determined by a qualified biologist. Factors to be considered for determining buffer size shall include presence of natural buffers provided by vegetation or topography, nest height above the ground, baseline levels of noise and human activity, species sensitivity, and proposed project activities. Generally, buffer size for these species shall be at least 500 feet for special-status bird species and at least 20 feet for common bird species. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment shall not be likely to adversely affect the nest. Any buffer reduction for a special-status bird species shall require coordination with the California Department of Fish and Wildlife. Daily monitoring of the nest by a qualified biologist or biological monitor during project activities shall be required if the activity has potential to adversely affect the nest as determined by the qualified biologist, the buffer has been reduced, or if birds within active nests are showing behavioral signs of agitation (e.g., standing up from a brooding position, flying off the nest) during project activities, as determined by the qualified biologist.					
DF-3: Identify and Avoid Burrowing Owls. AT&T shall retain a qualified biologist to conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet (500 meters) of underground segments of the project alignment.	AT&T to submit habitat assessment and implement	Habitat assessment of the Project Area; Burrowing owl surveys in areas of	CPUC and CDFW	Avoidance and protection measures are	The project owner shall follow the 2012 Staff Report on Burrowing Owl Mitigation. The initial habitat assessment should be conducted based on Appendix C. Suitable

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments

Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the project alignment. Surveys shall be conducted according to Appendix D of the 2012 *Staff Report on Burrowing Owl Mitigation* prepared by the California Department of Fish and Game (now California Department of Fish and Wildlife) (California Department of Fish and Game 2012), or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15 and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.
 	
If no burrowing owls are found, the qualified biologist shall submit a report documenting the survey methods and results to AT&T and the California Public Utilities Commission, and no further mitigation shall be required.
 	
If a burrow occupied by a burrowing owl is found during the surveys, AT&T shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.
 	
During the non-breeding season (September 1 through January 31), the minimum buffer distance shall be 164 feet (50 m). During the breeding season (February 1 through August 31), the minimum buffer distance shall be 1,640 feet (500 m).
 	
The buffer may be adjusted if, in consultation with the California Department of Fish and Wildlife, a qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, a
	avoidance and protection measures	suitable Burrowing owl habitat; Prior to and during construction activities		implemented as approved	habitat includes heavily altered habitats as described in the 2012 Staff Report.
					• Not likely to occur - no habitat present, outside range, no nearby CNDDB records. If you meet these criteria, no additional survey are needed**; submit Habitat Assessment Report to CPUC with the NTP request.**
					• Habitat Present, but no burrows - Suitable habitat as described the 2012 Staff Report is present and the site is within the range, but no burrows or artificial burrow surrogates are present. **Submit Habitat Assessment Report to CPUC with the NTP request.** Requires take avoidance survey no less than 14 days prior to initiating ground disturbance activities. Requirement to follow Appendix D survey protocol if new burrows are found.
					• Habitat Present, burrows present - requires the Appendix D four protocol level surveys.
					  ○ **Follow all reporting requirements in DF-3**
					  ○ BUOW found - follow Staff Report buffer requirements for avoidance.
					  ○ BUOW not found - Avoidance of unoccupied burrows is preferred approach. Requires take avoidance survey no less than 14 days prior to initiating ground disturbance activities in accordance with Appendix D. If there is a break in construction activities for 14

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and re-establish a buffer consistent with the first bullet until the agitated behavior ceases and normal behavior resumes. The buffer shall remain in place around the occupied burrow and associated satellite burrows until a qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days. Locations of burrowing owls detected during surveys shall be reported to the California Natural Diversity Database. If implementation of a buffer to prevent take of burrowing owl is not feasible, AT&T shall consult with the California Department of Fish and Wildlife and obtain an Incidental Take Permit prior to commencing project-related ground-disturbing activities. The impacts of taking burrowing owl shall be minimized and fully mitigated. AT&T shall compensate for the loss of burrowing owl by establishing permanent protection and perpetual management on land that provides burrowing owl habitat. Habitat management lands for burrowing owl may be established by conservation easement or fee title or credits may be purchased from a California Department of Fish and Wildlife-approved conservation or mitigation bank. The compensatory mitigation shall satisfy permit conditions and all other permit conditions shall be implemented.					days or longer, subsequent take avoidance surveys will be needed within 14 days prior to the restart of construction activities and again 24 hours prior to ground disturbance. Longer breaks in construction should require monthly status checks prior to the restart of construction to confirm new owls did not move in. Monthly status checks should still follow Appendix D to ensure the highest potential detection (such has time of day, weather conditions, etc.). • If, during construction activities, BUOW move into project areas not identified as suitable habitat during the habitat assessments, all survey, avoidance measures, and reporting requirements in DF-3 will apply.
DF-4: Identify and Avoid Crotch's Bumble Bee Colonies. AT&T shall implement all ground-disturbing activities and activities that would require the use of heavy equipment (i.e., excavation, directional boring) outside of the colony active period for this species, which is typically April 1–August 31, which will avoid	AT&T to implement avoidance and protection measures	All project areas requiring ground disturbing and heavy equipment activities; prior to and during	CPUC and CDFW	Avoidance and protection measures are implemented as approved	Conduct focused habitat assessment and surveys prior to ground disturbing activities and provide results to the CPUC for review

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
potential disturbance of underground Crotch's bumble bee colonies. If avoidance of the Crotch's bumble bee colony active period is determined to be infeasible, AT&T shall retain a qualified biologist to conduct a focused habitat assessment and surveys for Crotch's bumble bees prior to implementation of ground disturbing activities during the colony active period. A qualified biologist (i.e., familiar with bumble bees of California, experienced using survey methods for bumble bees) shall assess the project alignment through a desktop analysis and habitat assessment to determine whether foraging, nesting, or overwintering habitat for Crotch's bumble bee is present. The habitat assessment will follow the methods in *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species* (California Department of Fish and Wildlife 2023). If the site visit does not occur during the blooming season for flowering plants, historic aerial imagery will be referenced. If habitat suitable for Crotch's bumble bee is determined not to be present in the project alignment, then no further mitigation shall be required. If habitat suitable for Crotch's bumble bee is determined to be present in the project alignment, then the following measures shall be implemented prior to construction: a. Limited Operating Period If it is determined during the habitat assessment described above, that a work area contains foraging habitat or nesting habitat, initial ground-disturbing work shall take place between September 1 and March 31, if feasible, to avoid impacts on nesting and foraging Crotch's bumble bees. If this limited operating period is determined to be infeasible, then focused surveys for Crotch's bumble bee shall be conducted and avoidance measures shall be implemented. b. Focused Surveys and Avoidance Measures If it is determined during the habitat assessment described above, that a work area contains overwintering habitat (or if the limited operating period described above is infeasible for projects that contain foraging or nesting habitat), focused surveys for Crotch's bumble bee shall be conducted following the methods in *Survey Considerations for California Endangered Species Act Candidate*		construction April 1 through August 31			

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
Bumble Bee Species (California Department of Fish and Wildlife 2023). A qualified biologist shall conduct focused survey for Crotch's bumble bee before the start of any ground-disturbing activities. Focused surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from April through August when floral resources and ideal weather conditions are present, and shall follow the methods in *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species* (California Department of Fish and Wildlife 2023) or any subsequent protocol approved by the California Department of Fish and Wildlife. c. Non-Invasive Surveys Non-invasive focused surveys would include the use of cameras to photograph bumble bees. Photographs would be reviewed and verified by a qualified individual to identify the bumble bees to species. Permits are not required for non-invasive surveys. d. Non-Lethal Capture Surveys Surveys that would include capturing bumble bees for identification purposes and subsequently releasing the bees, would require a Memorandum of Understanding from the California Department of Fish and Wildlife. No capture surveys will be conducted before the surveyor obtains a Memorandum of Understanding. Prior to conducting non-lethal capture surveys, AT&T will provide the surveyor's qualifications and survey methodology to the California Public Utilities Commission and California Department of Fish and Wildlife for review and approval. For any non-lethal capture surveys, AT&T shall submit a survey report to the California Public Utilities Commission and California Department of Fish and Wildlife within 1 month of survey completion and shall notify the California Public Utilities Commission and California Department of Fish and Wildlife within 24 hours if Crotch's bumble bees are detected. If Crotch's bumble bees are not detected during the focused survey, no additional mitigation shall be required. If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures may include, but are not limited to, the following:					

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
Protective buffers shall be implemented around active nesting colonies until these sites are no longer active as determined by a qualified biologist. A qualified biologist, in consultation with the California Public Utilities Commission and California Department of Fish and Wildlife, shall determine the appropriate buffer size to protect nesting colonies; however, buffers will typically be at least 50 feet. If impacts on Crotch's bumble bee cannot be avoided, compliance with the California Environmental Species Act and consultation with California Department of Fish and Wildlife shall be required and may involve acquiring an Incidental Take Permit from the California Department of Fish and Wildlife. AT&T shall implement all avoidance measures included in the Incidental Take Permit. AT&T shall compensate for the loss of Crotch's bumble bee by establishing permanent protection and perpetual management on land that provides bumble bee habitat. Habitat management lands may be established by conservation easement or fee title or credits may be purchased from a California Department of Fish and Wildlife-approved conservation or mitigation bank. The compensatory mitigation shall satisfy permit conditions and all other permit conditions shall be implemented.					
DF-5: Identify and Avoid Special-Status Bat Roosts. AT&T shall implement all ground-disturbing activities and activities that would require the use of heavy equipment (i.e., trenching, directional boring) outside of the roosting bat season, which is typically April 1–August 31, which would avoid potential disturbance of special-status and common bats that may roost in or adjacent to the project alignment (e.g., under bridges, in trees). If avoidance of the bat maternity season is determined to be infeasible, AT&T shall retain a qualified biologist to conduct focused surveys for roosting bats prior to implementation of ground disturbing activities during the bat maternity season (April 1–August 31). The survey shall be conducted within 14 days of the start of ground-disturbing activities and shall include the project alignment and areas within 250 feet of the project alignment. If no evidence of bat roosts is found, the biologist shall document the findings in a report to AT&T and the California Public Utilities Commission, and no further mitigation shall be required.	AT&T to implement avoidance and protection measures	All project areas requiring ground disturbing and heavy equipment activities; prior to and during construction April 1 through August 31	CPUC	Avoidance and protection measures are implemented as approved	Conduct focused surveys within 14 days of the start of ground-disturbing activities and provide results to the CPUC for review

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
If evidence of bat maternity roosts or hibernacula is observed, species and number of bats using the roost shall be determined by a qualified biologist using noninvasive methods. Bat detectors (i.e., acoustic monitoring) or evening emergence surveys shall be used if deemed necessary to supplement survey efforts by the qualified biologist. A no-disturbance buffer of 250 feet shall be established around active pallid bat, pocketed free-tailed bat, Townsend's big-eared bat, western mastiff bat, or western yellow bat maternity roosts or hibernacula, as well as substantial maternity roosts or hibernacula of other bat species considered to be a wildlife nursery by the qualified biologist, and ground disturbing project activities shall not occur within this buffer until after the roosts are unoccupied as determined by a qualified biologist.					
DF-6: Implement Wildlife Entrapment Prevention Measures for Special-Status Reptiles. All trenches or other excavation sites shall be excavated and closed in a single work day to avoid leaving holes open overnight and potential wildlife entrapment. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape, or the United States Fish and Wildlife Service and California Department of Fish and Wildlife shall be contacted for guidance.	AT&T to implement protection measures	All project areas during trenching or excavation activities	CPUC	Protection measures are implemented as approved	
Cultural Resources					
CUL-1: Archaeological Monitoring. An archaeological monitor approved by the California Public Utilities Commission shall be retained by AT&T and shall be present during construction to observe project activities that may adversely affect cultural resources. The frequency and duration of monitoring shall be at the discretion of the California Public Utilities Commission upon review of final project construction plans. The archaeological monitor shall have the authority to stop work if a sensitive cultural resource is observed in or near the project alignment and shall report observations of sensitive archaeological resources to the California Public Utilities Commission immediately. The archaeological monitor shall coordinate with the California Public Utilities Commission in a manner and frequency determined by the California Public Utilities Commission upon review of final project construction plans, potentially including but not limited to written progress reports and periodic project meetings. The archaeological	Archaeological monitor to ensure compliance with CPUC Resolution T-17907 measures; coordinate with the CPUC	All project areas during construction activities that may adversely affect cultural resources	CPUC	Compliance with CPUC Resolution T-17907 measures as approved	Provide archaeological monitor resumes to CPUC to review at least two weeks prior to initial ground disturbance

Design Feature (DF)	Monitoring and Reporting Requirements	Monitoring Location, Timing and Frequency	Implementation Responsibility	Effective Criteria	Comments
monitor shall be retained at least two weeks prior to initial ground disturbance to review final plans and sensitive areas.					
CPUC Resolution T-17907 Conditions of Approval					
Notify, in writing, any affected public agency, including, but not limited to, any public agency having permit, land use, environmental, public health protection, or emergency response authority, of the exemption of the project pursuant to this section	AT&T to notify public agencies of exemptions	All Project areas prior to construction	CPUC	All conditions are implemented as approved	Provide documentation of notification to the CPUC
Provide notice to the public in the area affected by the project in a manner consistent with subdivision (b) of Section Public Resources Code Section 21108.	AT&T to notify the public near the project of construction activities	All Project areas prior to construction	CPUC	All conditions are implemented as approved	Provide documentation of notification to the CPUC
In the case of private rights-of-way over private property, receive from the underlying property owner permission for access to the property.	AT&T to document property owner permission to access private property	All Project areas prior to construction	CPUC	All conditions are implemented as approved	Provide documentation of access permission to the CPUC
Comply with all conditions authorized by law, imposed by city, county, or city and county as part of a local agency permit process, that are required to mitigate potential impacts of the proposed project, and to comply with the Keene-Nejedly California Wetlands Preservation Act (Chapter 7 (commencing with Section 5810) of Division 5), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), as applicable, other applicable state laws, and all applicable federal laws.	AT&T to implement all conditions imposed by federal, state, city, county, or city and county as part of a local agency permit process as applicable	All Project areas prior to construction	CPUC	All conditions are implemented as approved	AT&T to provide CPUC with confirmation of all relevant federal, state, county and local permits obtained.

2.2.2. Authority

Pursuant to Public Resources Code Section 21002.1(b), one of the CPUC's functions as Lead Agency is to mitigate and/or avoid the significant effects on the environment of projects it approves. This includes ensuring the measures it adopts are effective, enforceable, and are being implemented. The CPUC has additional authority under the Public Utilities Code. Consistent with the CPUC's rules and practices, including Public Utilities Code Section 768, the CPUC may require the performance of any other act that the health or safety of its employees, passengers, customers, or the public may demand.

2.2.3. Other Permits and Authorizations

Pursuant to Public Utilities Code Sections 314 and 582, the CPUC may require documentation or copies of permits issued by other agencies.

AT&T's Riverside 1 Project may require permits from other State, County, or local agencies. The Project's technical studies, including CPUC Resolution T-17907, are meant to support agencies' discretionary decisions (see Table 3) and address compliance and impacts under the following acts:

- Bald and Golden Eagle Protection Act (50 Code of Federal Regulations [CFR] 22)
- California Endangered Species Act (14 California Code of Regulations [CCR] 783 et seq)
- CEQA (14 CCR 15000 et seq, PRC 21000 et seq)
- California Fish and Game Code (Section 1600 et seq)
- California Native Plant Protection Act (Fish and Game Code §§ 1900-1913)
- Clean Water Act (40 CFR 100 et seq)
- Porter-Cologne Water Quality Control Act (California Water Code, §. 13000 et seq.)
- Federal Endangered Species Act (50 CFR 17)
- Migratory Bird Treaty Act (50 CFR 21)
- Habitat Conservation Plans or Natural Community Conservation Plans
- National Historic Preservation Act (36 CFR 80)
- Local Policies and Ordinances

3. ROLES AND RESPONSIBILITIES

Section 3 describes AT&T specific and CPUC specific roles and responsibilities for the Project. Section 3.2 describes the CPUC's monitoring responsibilities for the Project, ensuring that AT&T has adequately implemented Design Features and conditions of approval, and ensuring that construction activities are consistent with CPUC Resolution T-17907.

3.1. AT&T Roles and Responsibilities

AT&T personnel and contractors are responsible for implementing all environmental measures, permit conditions, and the CMCRP. This includes all terms and conditions in permits or approvals from local agencies. AT&T must comply with Project requirements, plan construction activities in a way that meets Project requirements, document compliance activities and environmental measure results, and

implement the CMCRP and provide information to CPUC documenting compliance with or how they intend to comply with the environmental measures, local permit conditions, and CMCRP.

3.1.1. AT&T Statewide Program Manager

Role and Responsibility. AT&T's statewide program manager manages AT&T's statewide FFA projects by providing overall program coordination, tracking project status, supporting schedule alignment, and helping ensure project activities are implemented consistently across applicable work locations. The statewide program manager oversees overall CEQA compliance for the program, including coordination of environmental requirements, review of compliance-related issues, and communication with CPUC and the CPUC's 3rd party monitoring team regarding project status, required documentation, and environmental compliance expectations.

Reporting Relationship. The AT&T statewide program manager reports to AT&T.

Communication. The AT&T regulatory director communicates with the CPUC and the CPUC's 3rd party monitoring team, AT&T's regulator director, project managers, and all members of the Project environmental compliance team.

3.1.2. AT&T Regulatory Director

Role and Responsibility. AT&T's regulatory director serves as the regulatory lead for communication with CPUC caseworkers, CPUC leadership, and other regulatory stakeholders regarding project status, compliance expectations, and required approvals. The regulatory director coordinates regulatory discussions and responses related to project implementation, environmental compliance, permit conditions, minor project refinements, Notices to Proceed, and other CPUC-directed requirements. The regulatory director will support timely escalation and resolution of regulatory questions or issues by coordinating with AT&T project management, environmental staff, construction leadership, CPUC representatives, and CPUC's 3rd Party monitoring team as needed.

Reporting Relationship. The AT&T regulatory director reports to AT&T. The regulatory director gives direction to AT&T's Project Managers, construction managers, and environmental compliance team.

Communication. The AT&T regulatory director communicates with the CPUC and local agencies, all members of the Project environmental compliance team

3.1.3. AT&T Project Manager

Role and Responsibility. AT&T's project manager (PM) will provide the overall direction, management, leadership, and coordination with local engineering and construction teams to support project planning, execution, and issue resolution. AT&T's PM is responsible for the Project construction schedule and for ensuring that the Project is completed as required by Project contract documents and conditions, including adopted environmental measures, and local agency permitting requirements.

The AT&T PM's responsibilities include but are not limited to:

- Leading coordination among engineering, construction management, and environmental staff for AT&T;
- Maintaining regular communication with the local Construction Manager regarding construction progress, schedule updates, field conditions, and environmental requirements;
- Providing construction schedule information for internal tracking and reporting purposes, including updates needed for coordination with regulatory, environmental, and project management stakeholders;

- Coordinating with the Lead Biologist, Statewide Program Manager, and local Construction Manager to support environmental compliance, pre-construction planning, field monitoring needs, and timely communication of project requirements;
- Supporting the preparation, coordination, and tracking of permit applications and agency communications to help ensure required approvals are obtained and project activities remain aligned with applicable permit conditions; and
- Following assigned tasks according to compliance checklist, and engaging employees and 3rd Party compliance experts to guide work activity and compliance.

Reporting Relationship. The AT&T PM reports to AT&T. The AT&T PM gives direction to AT&T's construction manager and environmental compliance team.

Communication. The AT&T PM communicates with the CPUC and local agencies, all members of the Project environmental compliance team. The AT&T PM also oversees all communication with AT&T contractors and team members.

3.1.4. AT&T Construction Manager

Role and Responsibility. The construction manager (CM) will manage and direct local construction teams responsible for field execution. Duties include:

- Determining staffing needs for each job site, assign the appropriate number of technicians, and coordinate crew availability to support planned construction activities, field conditions, and project schedule requirements;
- Coordinate local construction schedules, field monitoring activities, and progress reporting;
- Communicate schedule updates, construction status, staffing needs, and field issues to the C&E Project Manager and other project stakeholders to support timely resolution and continued compliance with project requirements;
- Compliance within design features as provided by compliance experts and project manager; and
- Follow work activities as designated by schedulers.

Reporting Relationship. The AT&T CM reports to the AT&T PM and the AT&T environmental compliance team. The AT&T CM gives direction to local construction teams and monitors.

Communication. The AT&T CM communicates with the AT&T PM and all members of the Project environmental compliance team. The AT&T PM also oversees all communication with subcontractors, Construction/Engineering Director, construction site personnel and monitors.

3.1.5. AT&T Construction/Engineering Director

Role and Responsibility. AT&T's Construction/Engineering Director provides leadership and oversight for construction, engineering, and project management activities to help ensure project work is planned, coordinated, and executed in alignment with approved scope, schedule, and quality expectations. They coordinate with the PM, CM, engineering resources, and other stakeholders to resolve project issues, support field execution, and maintain alignment between design requirements and construction activities. The Construction/Engineering Director supports escalation and decision-making for construction or engineering concerns, including schedule impacts, resource needs, design clarifications, field constraints, and coordination with environmental or regulatory requirements.

Reporting Relationship. The AT&T Construction/Engineering Director reports to the AT&T PM. The AT&T Construction/Engineering Director gives direction to AT&T's construction manager and environmental compliance team.

Communication. The AT&T Construction/Engineering Director communicates with the AT&T construction team and all members of the Project environmental compliance team. The AT&T Construction/Engineering Director also oversees all communication with AT&T contractors and team members.

3.1.6. AT&T Tribal Liaison/External Affairs Director

Role and Responsibility. AT&T's Tribal Liaison/External Affairs Director serves as the external affairs tribal liaison for any tribal locations within project area.

3.1.7. AT&T Lead Environmental Monitor/ Lead Biologist

Role and Responsibility. AT&T's Lead Environmental Monitor (LEM) and Lead Biologist serves as AT&T's vendor lead for environmental monitoring and biological support, providing project management, senior scientist, and senior environmental planning expertise to support construction activities and environmental compliance requirements. Duties include:

- Collaborate with AT&T to coordinate the Environmental Monitor role, complete required environmental surveys, and help ensure CPUC environmental measures are effectively implemented before and during construction;
- Coordinate with the Principal Biologist and Principal Archaeologist. If issues arise, the Principal Biologist or Principle Archaeologist visits the site to resolve them and reports to the LEM.
- Provide biological review and field support to identify sensitive environmental constraints, communicate biological requirements to project teams, and support implementation of avoidance, minimization, and reporting measures required under the CMCRP;
- Support AT&T with successful implementation, compliance tracking, and reporting for construction design activities under the CMCRP, including coordination of field observations, documentation, and follow-up actions as needed;
- Attend CPUC, AT&T, and internal project coordination calls and meetings to provide environmental status updates, identify compliance concerns, and support timely communication between construction, environmental, and regulatory stakeholders; and
- Trigger work start activities.

Reporting Relationship. The AT&T LEM reports to the AT&T PM and supports the PM in directing the work of the AT&T environmental compliance team and resource specialists, if required.

Communication. The AT&T LEM communicates with AT&T PM, environmental compliance team, and construction team to coordinate monitoring and implement Project environmental compliance requirements. The AT&T LEM will be the primary contact for the CPUC Environmental Compliance Manager and Monitor for any compliance issues observed at the Project sites.

3.1.8. Environmental Compliance Team

Role and Responsibility. The Project environmental monitors are the primary field staff responsible for evaluating, documenting, and verifying compliance of construction activities with all applicable requirements. The environmental compliance team for AT&T will be led by AT&T's LEM and CM under the

direct supervision of the AT&T PM. The LEM will coordinate the activities of the Project environmental compliance team, including biological and archaeological monitors (i.e., specialty monitors), to comply with each environmental measure. The Project environmental compliance team will work closely with construction personnel to ensure that pre-construction surveys are completed, and environmental measures are effectively implemented. Specialty monitors will be assigned by AT&T as needed and as required to protect sensitive biological, archaeological, and historic resources.

Reporting Relationship. The Project environmental compliance team reports directly to the LEM.

Communication. The Project environmental compliance team communicates with the LEM regarding the status of monitoring and compliance in the field. The LEM in turn will communicate with the CPUC Environmental Compliance Manager as needed, during construction.

3.1.9. Specialty Environmental Monitors

The AT&T LEM will oversee and coordinate specialty environmental monitors (such as biologists and archeologists) through a tiered supervisory structure. CPUC approved biological and archaeological monitors will be onsite during construction as required by DF-1 and CUL-1 to coordinate daily work, assist construction crews with interpreting environmental measures, and help correct compliance problems in a timely manner. If issues arise, the Principal Biologist or Principal Archaeologist will visit the site to resolve them and report to the LEM. The LEM will remain the primary contact for the CPUC Environmental Compliance Manager on compliance issues. Several Design Features require AT&T to supply a specialty monitor with specific qualifications. These monitors and the related Design Features are identified in Table 3-1.

Table 3-1. Specialty Monitors Required During Construction

Specialty Monitor	Related Design Features
Biological Monitor	DF-1
Qualified Avian Biologist	DF-2
Archaeological Monitor	CUL-1

3.2. California Public Utilities Commission Roles and Responsibilities

The CPUC, as Lead Agency, is responsible for oversight of compliance of the environmental measures and conditions of approval in the CMCRP.

3.2.1. California Public Utilities Commission Project Manager

The CPUC Project Manager (PM) has overall responsibility for determining the effectiveness of compliance with environmental requirements. The CPUC PM will be notified of noncompliance situations and may be involved in the resolution of the issue(s). All requests for Minor Project Refinements (Section 4.3.5) and NTPs will be submitted to the CPUC PM for review and approval. The CPUC PM will issue NTPs for construction of the Project. The CPUC has the authority to halt any construction activity associated with the Project if an activity is determined to be a serious deviation from the approved Project or adopted environmental measures. A stop-work order would follow the communication procedure outlined in Section 4.3.4.3.

AT&T's PM holds the primary responsibility for ensuring compliance with applicable environmental measures. The CPUC PM ensures and documents compliance achievement. Compliance is documented through site inspection forms, environmental measure tracking, and weekly and monthly reports to the

CPUC. The CPUC PM will be the designated point of contact for in-field agency staff regarding compliance and minor Project refinements. The CPUC PM will serve as the point of contact for noncompliance events. The CPUC PM will stay apprised of construction activities, schedule changes, and construction progress.

3.2.2. CPUC 3rd Party Environmental Compliance Manager

Role and Responsibility. CPUC's 3rd Party Environmental Compliance Manager (3rd Party ECM) is responsible for providing support to CPUC's 3rd Party PM for oversight of AT&T's successful implementation, compliance and reporting under the CMCRP and all other applicable environmental permits. The 3rd Party ECM is responsible for supporting the 3rd Party PM by attending construction and Project management meetings; reviewing AT&T's regular submittals during construction; reviewing and tracking AT&T's compliance with Project CMCRP, permits, and regulations; and reviewing daily and weekly AT&T and 3rd Party monitoring reports during construction.

Reporting Relationship. The 3rd Party ECM reports to the 3rd Party PM and supports the 3rd Party PM in directing the work of the 3rd Party environmental compliance team and resource specialists.

Communication. The 3rd Party ECM communicates with the 3rd Party PM and environmental compliance team.

3.2.3. CPUC 3rd Party Environmental Compliance Staff

Role and Responsibility. The CPUC 3rd Party Environmental Monitors (EMs) are the primary field staff responsible for evaluating, documenting, and verifying AT&T's compliance of construction activities with all applicable requirements. The environmental compliance team for CPUC will be led by Aspen's ECM under the direct supervision of the 3rd Party PM. The ECM will coordinate the activities of the CPUC 3rd Party environmental compliance team, including biological and archaeological monitors (i.e., specialty monitors), to comply with each environmental measure. The CPUC 3rd Party environmental compliance team will work to ensure that AT&T completes the required pre-construction surveys and environmental measures are effectively implemented. Specialty monitors will be assigned by Aspen as needed and as required to protect sensitive biological, archaeological, historic, and Native American resources.

Reporting Relationship. The CPUC 3rd Party environmental compliance team reports to the Aspen ECM.

Communication. The CPUC 3rd Party environmental compliance team communicates with the Aspen ECM regarding the status of monitoring and compliance in the field. Aspen's environmental compliance team will also interact with AT&T's Construction Manager as needed, during construction.

3.2.4. Permitting Agencies' Role

Personnel from permitting agencies identified in Table 3-2 may periodically visit the Project site to verify compliance with or request information from AT&T regarding compliance with laws, regulations, and Project permits. AT&T is responsible for responding to requests from permitting agencies and submitting the permits and authorizations to the CPUC according to Project requirements. See Section 4 for document submission procedures.

The CPUC will typically coordinate with AT&T on permitting concerns prior to contacting permitting agencies related to the Project; however, the CPUC may contact permitting agencies at any time regarding the Project and to clarify agency requirements, permit conditions, or approvals related to the agency's jurisdiction. The CPUC may also ask that AT&T obtain input from the permitting agency or that AT&T participate in discussion with the CPUC and the permitting agency. The CPUC retains the authority to coordinate directly with other agencies regarding the Project and all permit conditions or plan review comments.

The primary state, county, and local government agencies involved in the environmental review and permitting of the Project are shown in Table 3-2. Coordination with additional agencies and local jurisdictions may be needed as the Project progresses.

Table 3-2. State, County, and Local Permits

Municipality	Permit Number	Permit Type	Release Date	Expiration Date
Riverside County	ENC25010751	Encroachment Permit	1/13/2025	4/9/2025
Corona	PWNC25-00036	Utility New Construction Permit	5/15/2025	7/15/2025
Eastvale	PWE25-00101	Encroachment Permit	6/18/2025	9/15/2025
Jurupa Valley	EP25-322	Encroachment Permit	7/28/2025	10/26/2025
Jurupa Valley	EP25-312	Encroachment Permit	7/28/2025	10/26/2025
Jurupa Valley	EP25-336	Encroachment Permit	8/15/2025	11/12/2025
Jurupa Valley	EP25-324	Encroachment Permit	8/21/2025	11/19/2025
Jurupa Valley	EP25-347	Encroachment Permit	8/22/2025	11/19/2025
Eastvale	PWE25-00146	Encroachment Permit	10/02/2025	12/21/2025
Jurupa Valley	EPU25-080	Encroachment Permit	1/28/2026	4/28/2026
City of Riverside	GP-2025-11026	Permit to Open a Public Street	6/27/2025	6/23/2026
City of Riverside	GP-2025-11170	Permit to Open a Public Street	7/2/2025	7/2/2026
City of Riverside	GP-2025-11702	Permit to Open a Public Street	7/10/2025	7/9/2026
City of Riverside	GP-2025-14702	Permit to Open a Public Street	8/13/2025	8/11/2026
City of Riverside	GP-2025-15488	Permit to Open a Public Street	8/23/2025	8/25/2026
City of Riverside	GP-2025-16921	Permit to Open a Public Street	9/23/2025	9/18/2026
City of Riverside	GP-2025-17984	Permit to Open a Public Street	10/8/2025	10/2/2026
City of Riverside	GP-2025-18648	Permit to Open a Public Street	10/17/2025	10/17/2026
City of Riverside	GP-2025-18274	Permit to Open a Public Street	12/24/2025	12/22/2026
City of Riverside	GP-2025-01066	Permit to Open a Public Street	3/13/2025	4/08/2027
CALTRANS	08-25-6-TK-0756: Permit Writer Mandeep Kingra 08-25-6-RT-1468: Rider Permit Writer Rick H. Lam	Encroachment Permit	7/16/2025	Rider#1: 08-25-6-RT-1468 Expires 7/16/2026
CALTRANS	08-25-6-TK-0983 Permit Writer George Mikaeil 08-26-6-RT-0059: Rider Permit Writer Rick H. Lam	Encroachment Permit	8/28/2025	Rider#1: 08-26-6-RT-0059 Expires 8/31/26

4. PROCEDURES

This section contains CMCRP procedures for the personnel identified in Section 3. These procedures are relevant during the implementation of the CMCRP to help ensure that the Project meets all requirements specified in the environmental measures, and agency permits.

4.1. Pre-construction Compliance Verification

4.1.1. CPUC Resolution T-17907, Design Features

The CPUC will verify compliance with pre-construction Design Features (DF) and conditions of approval prior to construction. If required by the DF, AT&T must obtain approval of all biological monitors, verify that permitting requirements of other agencies have been met, and perform all required surveys and notifications before construction begins (Table 4-1). The purpose of the pre-construction process is to complete all required actions so that the CPUC can issue NTPs for the Project.

Table 4-1. Reports and Other Documentation Required for Compliance Verification

Item	Environmental Measures/ Design Features	Responsible Action Agency
Biological Monitor	DF-1	CPUC
Focused Nesting Bird Surveys (if required)	DF-2	CPUC
Burrowing Owl Habitat Assessment Report	DF-3	CPUC
Burrowing Owl Surveys (if required)	DF-3	CPUC and CDFW
Crotch's Bumble Bee Surveys (if required)	DF-4	CPUC
Focused Bat Surveys (if required)	DF-5	CPUC
Obtain Necessary Permits and Permissions	Conditions of Approval	CPUC/State/Riverside County/City
Agency and Public Notifications	Conditions of Approval	CPUC

4.1.2. Notice to Proceed Process

AT&T is required to obtain CPUC authorization prior to initiating construction activities through the NTP process. The NTP process involves AT&T submitting an NTP request to the CPUC and the CPUC PM issuing an NTP authorization letter. The CPUC will not authorize construction activities until all relevant pre-construction requirements are completed as appropriate for the Project. Before granting an NTP, the CPUC will confirm that the applicant has complied with all pre-construction environmental measures, including specified surveys, and has obtained all appropriate approvals from other permitting agencies. The CPUC PM may authorize Project activities through one or more NTPs for separate phases of the Project as determined necessary. AT&T may determine the phases based on pre-construction compliance, construction schedule, the anticipated schedule for permit approvals, and other considerations.

Each NTP may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. Note that the CPUC may not include new conditions or requirements that are inconsistent with CPUC Resolution T-17907 Environmental Measures; however, the CPUC may include new conditions or requirements that are consistent with those measures. Construction is defined as all construction-related activities, including site clearing; placement of signs, fences, structures, or other materials; or any mobilization activity that would move construction-related equipment and/or materials onto a site.

The NTP request must include the following, as applicable:

- Description of the work to be performed, including a brief comparison of the proposed work and the Project components as provided to the CPUC if multiple NTPs are requested for different stages of construction activities.
- Description of all activities required for the Project component or components (for example, electrical, plumbing, excavation, paving, landscaping, or site restoration);

- Identification of any staging areas that would be used during construction;
- Brief description of the location of the Project component or components covered in the NTP request, including maps, photographs, or other supporting data;
- Estimate of area of total land disturbance and use, both temporary and permanent, associated with the NTP request;
- Date of expected construction initiation and duration of work;
- Anticipated number of construction workers, including total workers and peak number;
- Verification that all relevant pre-construction design features have been or will be completed or implemented (e.g., submittal of biological resource survey reports);
- List of all relevant design features that will be implemented;
- Verification that all applicable permits or agency approvals have been or will be obtained for the work covered by the NTP request (if required); and
- For any pre-construction compliance items that cannot be completed prior to issuance of the NTP due to specific timing requirements for the item (e.g., pre-construction surveys that must be completed within a defined timeframe), a description of the outstanding submittals and timing for when they will be completed and approved prior to construction.

In conjunction with the CPUC PM, the CPUC 3rd Party Environmental Monitoring staff will review each NTP request in accordance with the steps outlined below:

- AT&T submits an NTP request;
- The CPUC PM or 3rd Party PM distributes the NTP request to the appropriate resource specialists and reviewers to determine the completeness of the request, as applicable;
- The CPUC PM and/or 3rd Party PM also review the NTP and, if needed, prepare a list of outstanding requirements, identifying where additional information or clarification is needed;
- The CPUC PM or 3rd Party PM submits any questions and comments, including requests for required additional information or clarification, to AT&T via email;
- As needed, AT&T submits clarifications and/or additional information to be added to the NTP request in a memo, email, or letter format, along with responses addressing all comments and questions forwarded by the CPUC PM and/or 3rd Party PM;
- The CPUC PM and/or 3rd Party PM updates a Project Implementation Tracker documenting compliance and any outstanding requirements that need to be made conditions of the NTP. If comments or conditions are provided by permitting agencies, these are also considered for incorporation into the NTP approval letter and compliance table;
- The CPUC PM prepares the draft NTP Authorization Letter, which documents the scope of work, compliance with all requirements, and lists outstanding conditions; and
- The CPUC PM reviews and approves the NTP Authorization Letter and sends the approval to AT&T.

4.2. Communication Protocol

Communication is a critical component of a successful environmental compliance program. To avoid Project delays and possible work stoppages, the CPUC PM, CPUC 3rd Party Environmental Compliance Team and AT&T environmental and construction representatives will interact regularly; maintain

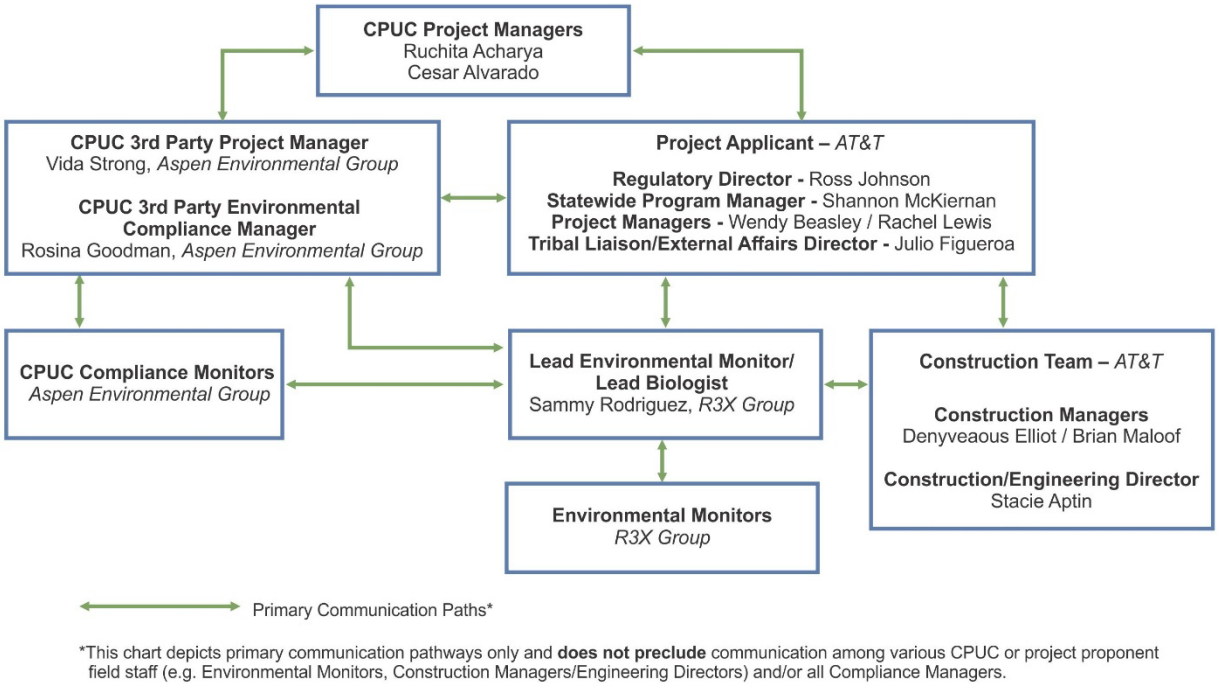
professional, responsive communication at all times; and coordinate closely to address and resolve issues in a timely manner. This section presents a communication protocol to accurately and efficiently disseminate information regarding ongoing surveys, environmental measures, construction activities, construction contractor oversight, and planned or upcoming work prior to the commencement of construction. These communication protocols may be refined and revised for future versions of this CMCRP as needed to address the specific day-to-day realities of Project construction.

4.2.1. Organizational Chart

Figure 2 is an organizational chart that illustrates communication between CPUC and AT&T personnel. The CPUC and AT&T are responsible for informing others about changes in staff. Contact information is provided in Appendix A.

This chart depicts primary communication pathways only and does not preclude communication among various CPUC or AT&T field staff (e.g., project manager and construction leads/managers) and/or all environmental managers.

Figure 2. Riverside 1 Organizational Chart



4.2.2. Pre-construction Coordination

AT&T is required by the terms of the environmental measures to perform various surveys and studies prior to construction. During this pre-construction process, AT&T may conduct meetings, conference calls, and site visits with the CPUC PM and other agencies and AT&T's environmental representatives, as appropriate. The purpose of the pre-construction coordination process is to discuss document submittal status, document the findings of data reviews and jurisdictional agency approvals, review AT&T submittals, and document the status of environmental measures as they apply to the Project (see Section

4.4 for document submittal procedures). The goal of the pre-construction process is to complete all required actions so the CPUC can issue NTP authorizations.

4.2.3. Communication Protocol During Construction

This section outlines daily, weekly, and monthly communication protocols and processes.

4.2.3.1. Progress Meeting and Communication During Construction

Conference calls may be held on a regular basis (i.e., weekly) or on an as-needed basis throughout construction. The need for conference calls, whether regular or as needed, should be determined in the early stages of construction. Participants should generally include the CPUC PM and the CPUC 3rd Party PM and ECM, the AT&T PM, and representatives from AT&T who are knowledgeable about Project engineering and schedule.

AT&T will invite CPUC representatives (as identified by CPUC) to the weekly monitoring management meeting, or through additional meetings to be established with AT&T and the CPUC. These meetings can be reduced in frequency to bi-weekly or monthly as agreed upon by AT&T and the CPUC. All authorities having jurisdiction are invited to attend.

Specialty monitors, technical experts, and/or construction contractors will be invited as needed. Call timing and participants may vary according to the topics discussed. Topics discussed on status update conference calls will include overall project schedule, weekly construction schedules, pertinent environmental compliance issues, any anticipated minor project changes, and any relevant compliance patterns and trends.

4.2.3.2. Field Staff Communication During Construction

Regular communication among the CPUC PM, AT&T, and construction staff can address many issues that arise during construction. All field staff will be equipped with cell phones or two-way radios (or immediate access to a cell phone or radio) and should be available to receive calls at all times during construction.

Off-site staff will be available during normal business hours via email or phone. If field-based staff change regularly (e.g., if lead monitors are on duty only one or two days per week), the use of a single point of contact is highly recommended (e.g., a single cell phone should be assigned to whichever lead monitor is on duty each day) to facilitate communication continuity. Changes to key staff will be reported to the CPUC PM as soon as possible, and the Project contact list in Appendix A will be updated accordingly.

The CPUC primary point of contact in the field is the AT&T LEM. The CPUC will contact the AT&T LEM if an activity is observed that conflicts with one or more of the environmental measures or permit conditions. The CPUC will also contact the AT&T LEM regarding construction crew work locations; status of environmental measures or permit conditions; and the overall construction schedule. Much of this information can be obtained through participation in tailgate meetings prior to the start of construction each day. The CPUC may discuss construction procedures directly with the construction manager, but such discussions should be limited to basic questions pertaining to clarification of daily Project activities and environmental measure compliance. All other questions between contractors and CPUC, especially those concerning construction means and methods, should be directed to the AT&T LEM. The CPUC will not provide work direction to the contractor or AT&T's environmental monitors and will avoid directing questions to the construction crews.

4.2.3.3. Questions and Clarifications

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. Both AT&T and the CPUC PM/CPUC 3rd Party PM/ECM shall submit important questions and clarifications in writing via email (e.g., full compliance with environmental measures, procedures, and Project changes). Email correspondence and compliance and monitoring reports should be used to document resolutions.

4.2.3.4. Construction Schedule

AT&T shall keep the CPUC PM and the CPUC 3rd Party PM/ECM informed of delays in the construction schedule as contained in the CMCRP. In particular, AT&T shall inform the CPUC of any schedule changes that may affect implementation of the CMCRP. AT&T will provide a general schedule once construction timelines have been determined.

4.2.3.5. Dispute Resolution

The CMCRP is intended to reduce or eliminate potential disputes; however, even with the best preparation, differences in environmental protection measure implementation approaches and interpretation may occur. Issues should first be addressed informally at the field level between the CPUC 3rd Party EMs and the AT&T LEM and environmental compliance team. Questions then may be raised to the AT&T CM or PM, and the CPUC 3rd Party PM/ECM or the CPUC 3rd Party PM as necessary.

Should the issue not be resolved at the field level the following procedure will be observed for dispute resolution:

> **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC PM for resolution. The CPUC PM will attempt to resolve the dispute. If the dispute can be resolved by AT&T, then the CPUC PM will direct the party in question to AT&T.
>
> **Step 2.** Should this informal process fail, the CPUC PM may initiate enforcement or compliance action to address deviations from the approved Project or adopted environmental measures.
>
> **Step 3.** If an informal dispute or complaint regarding the implementation or evaluation of the measures cannot be resolved by CPUC staff, it may be referred for a formal enforcement or compliance action by the CPUC.
>
> **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 CPUC via a procedure to be specified by the CPUC.

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.

4.3. Monitoring and Compliance Reporting during Construction

As the Lead Agency under CEQA, the CPUC is required to ensure that the environmental measures and conditions of approval are implemented.

4.3.1. CPUC Compliance Monitoring

CPUC 3rd Party EMs will use the CPUC Resolution T-17907 Environmental Measures in the field to confirm AT&T's compliance with these requirements, first on a daily or weekly basis during the initial month of construction and after the first month of construction, the 3rd Party EMs will perform field spot checks of AT&T's construction and construction monitoring crews as necessary. The 3rd Party EMs will also conduct

field visits to resolve any non-compliance issues that are able to be handled among the site crew staff members, and to carry out any compliance reporting as directed by the CPUC PM, the CPUC 3rd Party PM or the CPUC 3rd Party ECM.

4.3.2. CPUC Compliance Tracking

The CPUC will track compliance with mitigation requirements. The CPUC will also track important Project procedures (e.g., formal request and approvals) and incidents throughout the Project. The CPUC will track other information as part of the CPUC-authored Monthly Monitoring Summary Report, including NTP and minor Project refinement requests and approvals, resolutions to compliance risks, and documented incidents.

4.3.3. AT&T Monitoring and Compliance Reports

4.3.3.1. Weekly Construction Schedule

AT&T will submit a weekly construction schedule each Friday showing the anticipated construction activities for the following week. The weekly construction schedule will include the type of work activity (e.g., vegetation clearing, grading, foundation installation, structure erection), the location of the work activity, and the day(s) work is anticipated to take place.

4.3.3.2. Monthly Project Progress Report

AT&T's construction contractor will provide the CPUC representatives (as identified by CPUC) with their monthly progress reports by the 10th day of the month for the previous month's work activities. The monthly progress will include construction progress that was made that month, concerns, and/or activities of note, and will confirm work locations and schedule as needed in order to convey unanticipated schedule changes.

4.3.3.3. Monthly Environmental Compliance Report

AT&T will prepare and submit a Monthly Environmental Compliance Report to the CPUC by the 10th day of the month for the previous month's work activities (see Appendix B). The Monthly Environmental Compliance Report will include the following:

- Construction status update for all active work phases and a look-ahead work description and schedule for subsequent work;
- Compliance summary detailing compliance activities such as notable survey efforts, noncompliance incidents and their resolutions, preparation for implementation of environmental measures for future work phases, recently submitted or processed Project changes, a list of outstanding agency deliverables and the estimated timing for submittal/implementation, and representative monitoring photographs. AT&T is required to keep accurate and detailed accounts of noncompliance incidents (and subsequent resolutions) as identified by the CPUC or as self-reported.

AT&T will also submit Weekly Public Complaint Logs and Noncompliance Incident Reports as detailed in the following section.

4.3.4. CPUC Incident Response and Communication

The CPUC determines if any construction activity deviating from permit conditions, NTPs, or environmental measures, particularly when the activity puts a sensitive resource at risk, should be considered a noncompliance incident. A noncompliance incident may include failure to fully comply with all terms and conditions in permits or approvals from other state, county, or local agencies that are relied

upon in the environmental measures. In addition, an environmental measure not implemented according to the timing listed in the CMCRP table (Table 2-1 in this document) would be considered a noncompliance incident.

4.3.4.1. Noncompliance Reporting

If AT&T discovers a noncompliance incident of any magnitude, they must notify the CPUC PM of the incident (self-report). Noncompliance incidents may also be discovered by the CPUC and brought to the attention of AT&T. For both self-reports and discoveries, the CPUC PM may request an email or a formal noncompliance incident report (Appendix C) from AT&T, either of which must include a description of the incident and corrective actions taken or proposed. Upon receipt of the noncompliance incident email or formal report, the CPUC PM will determine the next steps for reporting and follow-up to reestablish compliance. The CPUC PM will assign the incident a noncompliance level and issue a noncompliance report to AT&T. AT&T must track all noncompliance incidents and document the incidents and implementation of corrective actions in their monthly reports.

Examples of noncompliance incident levels are provided under the subheadings below. CPUC uses the following levels to categorize the severity of noncompliance incidents:

Minor Compliance Incident: A minor compliance incident is an action that only slightly or partially deviates from Project requirements and does not impact, or have the potential to impact, environmental resources. Examples include the one-time use of an unapproved, pre-existing access road or failure to properly maintain an erosion or sediment control structure, but the structure remains functional. Repeated minor compliance incidents resulting from the same action or individual may result in elevating the noncompliance level.

Noncompliance Level 1: A Level 1 noncompliance incident is an action that deviates from Project requirements or results in the partial implementation of the environmental measures but does not impact, or have the potential to impact, environmental resources. Examples include failing to properly maintain an erosion control structure, resulting in minor runoff that does not impact a sensitive resource, or work or staging of materials outside of approved work limits where the incident is within a previously disturbed area, such as a gravel lot.

Noncompliance Level 2: A Level 2 noncompliance incident is an action that deviates from Project requirements or environmental measures that results in minor impacts, or has the potential to result in minor impacts, to environmental resources. Examples include construction activities occurring within an exclusion zone with indirect impacts to sensitive species or significant cultural or paleontological resources that can be rectified or halted before causing permanent damage. A noncompliance Level 2 may be issued when Level 1 incidents are repeated.

Noncompliance Level 3: A Level 3 noncompliance incident is an action that deviates from Project requirements and results in major impacts or has the potential to immediately result in major impacts, to environmental resources. These actions are not in compliance with the environmental measures, permit conditions, and/or approval requirements (e.g., minor Project changes, NTPs), and/or violate local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A Level 3 noncompliance notice may also be issued if Level 2 incidents are repeated. Level 3 noncompliance incidents may result in a full or partial Project shutdown following a stop-work order from the CPUC PM.

- Noncompliance may result in the withholding of Federal Funding Account payments and/or the commission may consider further action.

4.3.4.2. Incident Response Communication Process

If the issue puts sensitive resources or human health and safety at risk and a stop-work order is warranted, AT&T's LEM will contact the CPUC 3rd Party ECM and AT&T's PM immediately, as described further below. If the noncompliance incident does not require immediate resolution, the incident will be discussed in a phone call or email to the AT&T PM or on the weekly conference call.

If the incident is minor and can be easily resolved in the field by providing clarification to construction crews, if it requires immediate action to prevent an easily avoidable but serious environmental impact, or if time is needed to investigate a compliance incident further, the LEM will notify the CPUC PM, who may authorize a temporary hold.

Once the issue is resolved, the CPUC PM will authorize the lift of the hold to AT&T's PM. If the issue is not fully resolved and may require further action or management discussions, the CPUC PM may issue a stop-work order or initiate a stand-down.

If while on-site AT&T environmental monitors/LEM are unaware of the issue or are aware of an issue but do not act within a reasonable time period to resolve it, the CPUC 3rd Party EMs may record the noncompliance in their reports. Level 1 incidents are generally "issued" in the site inspection form but may also be identified by compliance monitors during review of monitoring reports. Level 2 or 3 incidents require consultation with the CPUC PM and are issued in separate formal reports to AT&T.

AT&T should contact the CPUC 3rd Party ECM immediately for serious noncompliance incidents and report minor noncompliance incidents via email and possibly a phone call. The CPUC 3rd Party ECM will send an email notification to the AT&T PM to ensure tracking of the incident. The CPUC will not typically issue a noncompliance notice for a minor or Level 1 self-reported incident. Noncompliance incident reporting is described in additional detail below.

Following the initial discovery or report, the CPUC 3rd Party PM may request photographs, a written incident description, and other relevant information from AT&T staff concerning the cause and potential resolution of the issue. The CPUC 3rd Party PM will direct AT&T to submit the information via email or through a formal noncompliance report according to the incident severity. The CPUC 3rd Party PM may issue a follow-up noncompliance report from the CPUC for the same incident.

All noncompliance incidents must be described and tracked in AT&T's monthly report to the CPUC PM. For serious noncompliance incidents, the CPUC PM may issue a stop-work order as described below. Work will be suspended within the affected area until a resolution can be planned and the CPUC PM authorizes the resumption of construction activities in writing.

A stand-down may be initiated by the CPUC PM, or AT&T. In this case, work will be halted temporarily to discuss the current compliance concern and/or re-align compliance activities as appropriate.

Issues that are not resolved within the length of time agreed upon by AT&T and the CPUC PM will be subject to further noncompliance notices and potential stop-work orders.

Serious or emergency compliance incidents that occur on the weekend or after normal business hours (8:00 a.m. to 5:00 p.m.) will be addressed by staff identified as emergency contacts on the Project Contact List (Appendix A).

Permitting agencies may require notification if there is an incident that relates to an agency's jurisdiction over the Project. AT&T shall be responsible for notifications to permitting agencies and shall provide copies of official notifications and submittals sent to other agencies to the CPUC. If the CPUC finds that a notification to another agency is required, the CPUC may direct AT&T to notify the other agency.

4.3.4.3. Construction Halts and Stop-Work Orders

Several scenarios may occur during Project construction for which AT&T's LEM may need to communicate immediately with field staff to halt construction activity (when it is safe to do so), including the following:

Temporary Hold

A temporary hold is a short-term (i.e., less than 8 hours) cessation of construction activities. This hold would be implemented in circumstances where a minor clarification of an environmental measure or resolution of a minor issue by the field compliance crews is necessary to ensure environmental compliance where a resource is at risk, or where a serious environmental infraction could occur without immediate intervention. CPUC 3rd Party EMs would consult with the CPUC PM in the case of a temporary hold and is authorized to end the hold with clear communication to the AT&T LEM and AT&T CM, if the monitor confirms that environmental compliance will be achieved. Depending on the issue, a temporary hold could transition to a stop- work order (below).

Stop-Work Order

In the event of a serious noncompliance or safety issue (e.g., take of a listed species; repeated, high-level noncompliance incidents concerning the same resource; or serious worker injury), the CPUC may elect to issue a stop-work order. The stop-work order would be issued in writing by the CPUC PM and may require work to stop on all or portions of the Project, or on certain construction activities, for a time period determined by the CPUC PM on a case-by-case basis. The stop-work order would also include a timeline for resolution of the situation and any potential recommendations from the CPUC. Resolution of the compliance issue would be communicated in writing by AT&T to the CPUC PM, who would then issue an end to the stop-work order in writing. The applicant would be required to implement any temporary hold or stop-work order in a responsible manner to avoid hazards to public health and safety, as well as to environmental resources. Certain activities cannot be safely halted mid-course, and all work areas must be first safely secured for protection of humans and wildlife prior to complete cessation of work. Additionally, as appropriate, the applicant should address any serious health or safety issues by calling 9-1-1 immediately.

Construction Stand-down

Either the CPUC PM, or AT&T, may initiate a construction stand-down to discuss resolution of a noncompliance or safety issue. A stand-down differs from a stop-work order in that the issue at hand would not immediately result in serious consequences but requires an overall re-alignment of protocols or practices to ensure continued compliance or safety. The stand-down could require work to stop on all, or a portion, of the Project for up to one full day, or until a process and schedule for resolution can be determined by CPUC staff and AT&T. The purpose of the stand-down would be to give AT&T the opportunity to re-train construction personnel, confer with management staff to achieve resolution, and/or discuss an issue with the CPUC PM. As indicated, a stand-down can be a voluntary action by AT&T and should be issued in writing (email is acceptable) with clear timelines and recommendations stated.

Resolutions resulting from a stand-down should be submitted in writing to the CPUC PM. A stand-down initiated by AT&T does not require approval by the CPUC to re-start work but must be reported to the CPUC.

4.3.4.4. Public Complaints

AT&T shall provide weekly summaries of public complaints, including how each complaint was addressed, within the Weekly Status Report. The CPUC PM will coordinate with AT&T's PM, who will work with AT&T to determine the adequacy of corrective actions or additional measures to be implemented, as necessary.

Public complaints will not reflect negatively on AT&T's environmental compliance record unless a specific Project requirement, permit, or plan requirement was violated.

4.3.4.5. California Environmental Quality Act Citation Program

Resolution E-4550 (May 9, 2013)[1] created the CEQA Citation Program that authorizes CPUC staff to fine public utilities for noncompliance with Certificate of Public Convenience and Necessity (CPCN)s. The program allows CPUC staff to draft and issue citations and levy fines for noncompliance with a CPCN. CPUC staff will determine whether a fine is appropriate for noncompliance events consistent with Resolution E-4550. Examples of noncompliant activities that may result in fines being issued by CPUC staff include, but are not limited to, the following:

- Continuing construction after an authorized staff person has required construction to stop;
- Starting construction components that have not been approved through an NTP (see Section 3.2.2);
- Violating nest buffer zones;
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance;
- Grading, foundation, line work, or other ground disturbance without required biological pre-construction surveys or a biological monitor on site;
- Use of new access roads, overland travel routes, staging areas, or extra workspaces that have not been approved;
- Failure to properly maintain an erosion or sediment control structure;
- Working outside of approved work hours; and
- Project personnel working without training.

4.3.5. Minor Project Refinements

This section describes the CPUC process for approving Minor Project Refinements (MPR). MPRs would be strictly limited to changes that do not trigger additional permit requirements, do not increase the severity of an impact or create a new significant impact, and are within the geographic scope of the CPUC Resolution T-17907 Environmental Measures. The CPUC PM would evaluate any proposed changes from the approved Project to determine whether they are consistent with approved Resolution T-17907. If the CPUC determined the changes to be consistent with the CPUC Resolution T-17907, a requested change would be processed as an MPR using the Minor Project Refinement Form (Appendix D).

If a Project change is not consistent with CPUC Resolution T-17907, the applicant would be required to submit a Petition for Modification (PFM). The CPUC would evaluate the PFM to determine if the change is covered under the CPCN or if a revised CPCN and/or Conditions of Approval are required.

Requests for CPUC PM approval of an MPR must be made in writing and include the following:

[1] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M065/K136/65136746.PDF

- A detailed description of each proposed change, including an explanation of why the change is necessary;
- Identification of the environmental measures, Project parameters, or other Project stipulations for which the change is being requested, and citations for any associated approved documents;
- Photographs, maps, and other supporting documentation illustrating the difference between the existing conditions in the Project area, the approved Project, and the proposed change;
- The potential impacts of the proposed change, including a discussion of each environmental issue area that could be affected by the changes, with accompanying verification that there would be no increase in the severity of identified significant impacts on resources affected by the Project and no new significant impacts after application of previously adopted environmental measure(s);
- Whether the change would conflict with any environmental measures;
- Whether the change would conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; and
- The date of expected construction at the area of proposed change.

The CPUC PM may request additional information, agency consultations, or a site visit in order to process the request. Examples of MPRs that may be approved by the CPUC PM through submittal of a Minor Project Refinement Form include, but are not limited to, the following:

- Adding a temporary extra work area: the additional work area must be located in a previously disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area and must not create any new significant impacts or a substantial increase in the severity of a previously identified significant impact;
- Adjusting the alignment of a Project component within the study area that was defined in the original environmental analysis to avoid sensitive resources or effects on homeowners, or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, as long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact; and
- Finalizing the engineering design for a Project component that was not specifically described in CPUC Resolution T-17907 or that requires adjustments in order to facilitate construction. The finalized design must not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.
- Changes to the Design Features that are based upon field survey results to reduce or avoid potential impacts to biological and cultural resources.

4.4. Documentation and Submittal Requirements and Records Management

4.4.1. Electronic Submittals

All required documentation from AT&T, including permits, reports, and staff qualifications as required by environmental measures, will be provided to the CPUC via the GMS Portal. In addition, AT&T shall provide the CPUC with electronic records (i.e., emails, permits, and authorizations) related to final agency approvals for the Project if the CPUC is not directly involved with the coordination effort, pursuant to Public Utilities Code section 314. AT&T must also provide the CPUC with copies of permit amendments and modifications in addition to notifying the CPUC of proposed permit changes. The electronic records may be submitted by email or transmitted via GMS Portal.

4.4.2. On-site Documentation

In addition, copies of the CMCRP and all applicable permits compiled prior to and during construction (e.g., SWPPP, Traffic Management Plan, etc.) shall be kept on-site at the AT&T Construction Yard and all supervisory staff working on the Project should be familiar with their contents.

4.4.3. Administrative Record

The CPUC PM will compile all required documentation submitted by AT&T into the Project's Administrative Record during construction and will confirm that the record is complete after completion of all activities required by the adopted environmental measures. The CPUC PM will also use this documentation to create a final environmental compliance report or presentation that will discuss environmental measure implementation and success, with the goal of identifying lessons learned that can be applied to future Projects.

4.4.4. Public Access

Through the CPUC's public website for the Project, members of the public may request copies of non-confidential records and reports used to track the monitoring program, and the CPUC PM will send copies of publicly available records and reports to members of the public as requested. Certain mitigation monitoring related documents will be made available on the Project website:

[Insert hyperlink here when available]

Appendix A PROJECT CONTACT LIST

Name	Position	Email	Phone (Work)	Phone (Mobile)
AT&T Contacts				
Wendy Beasley	Project Manager	wd2418@att.com	(619) 266-4725	(619) 307-3929
Rachel Lewis	Project Manager	Rh7862@att.com	(714) 618-9145	(657) 281-5510
Denyveaous Elliot	Construction Manager	de6275@att.com	(714) 237-6946	(714) 310-8338
Brian Maloof	Construction Manager	bm1953@att.com	(562) 412-6869	(562) 412-6869
Julio Figueroa	Tribal Liaison/External Affairs Director	jf1934@att.com	(951) 680-8977	(951) 640-3667
Stacie Aptin	Construction/Engineering Director	sg9282@att.com	(714) 566-7383	(714) 606-2681
Shannon McKiernan	Statewide Program Manager	sy7318@att.com	n/a	(530) 613-2110
Ross Johnson	Regulatory Director	rj2397@att.com	(415) 417-5028	(415) 613-2074
AT&T Contractors				
Sammy Rodriguez	Lead Environmental Monitor/ Lead Biologist	sammy@r3xgroup.com	n/a	(254 723-0013
California Public Utilities Commission				
Ruchita Acharya	CPUC Project Manager	Ruchita.Acharya@cpuc.ca.gov		
Cesar Alvarado	CPUC Supporting Project Manager	Cesar.Alvarado@cpuc.ca.gov		
Aspen Environmental Group (CPUC 3rd Party Monitor)				
Vida Strong	Aspen Project Manager	vstrong@aspeneg.com	n/a	(805) 682-2615
Rosina Goodman	Compliance Manager	rgoodman@aspeneg.com	(909) 818-597-3407	(909) 653-3335
TBD	Compliance Monitor			

Appendix B MONTHLY COMPLIANCE REPORT

Appendix C INCIDENT REPORT FORM

RIVERSIDE 1 PROJECT
CONSTRUCTION NONCOMPLIANCE REPORT

Incident Date:		Report No.:	
Date Submitted:		Location:	
Level:		Relevant Plan/Measure:	
Current Land Use:		Sensitive Resources:	

Description of Incident:
Pertinent Plans/Permits/Environmental measures:
Proposed Resolution:
Recommended timeline for follow-up:

Approvals	Date	Name (print)	Signature	Comments
CPUC Project Manager (if applicable)				
Zayo Project Manager (if applicable)				

Prepared by:_____ Date: _____

Noncompliance Level	Example
A Level 1 noncompliance incident is an action that deviates from Project requirements or results in the partial implementation of the environmental measures but has not caused, nor has the potential to cause, impacts on environmental resources.	i. Failure to implement adequate dust control measures, resulting in no impact on resources ii. Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters) iii. Inadvertent minor incursion into exclusion area, resulting in no harm to sensitive biological or cultural resources iv. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot
A Level 2 noncompliance incident is an action that deviates from Project requirements or environmental measures and has caused, or has the potential to cause, minor impacts on environmental resources.	i. Work without appropriate permit(s) or approval ii. Failure to properly maintain an erosion or sediment control structure, but the structure remains functional, and results in minor impacts on resources (e.g., water courses) iii. Working outside of approved hours iv. Repeated documentation of Level 1 incidents
A Level 3 noncompliance incident is an action that deviates from Project requirements and has caused, or has the potential to cause, immediate and major impacts on environmental resources. These actions are not in compliance with the environmental measures, permit conditions, approval requirements (e.g., minor Project changes, NTP), and/or violate local, state, or federal law.	i. Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site ii. Imminent danger or documented impact to a sensitive or threatened and endangered species iii. Repeated deviations from required environmental measures/requirements that have been documented as Level 2 incidents iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk

Appendix D MINOR PROJECT REFINEMENT FORM

Environmental Minor Project Refinement Form

Project Name: _____ Request Prepared By: _____

Date Approval Required: _____ Request No.: _____

Date Submitted: _____ Location: _____

Landowner: _____ Landowner Parcel Number: _____

Current Vegetative Cover/Land Use: _____

Existing Sensitive Resource? ☐ NO ☐ YES Specify: _____

Modifying (check as many as apply): ☐ ENVIRONMENTAL MEASURE ☐ PLAN/PROCEDURE ☐ SPECIFICATION

☐ DRAWING ☐ PERMIT CONDITION ☐ OTHER

Specify Source (e.g., Mitigation Measure B.5): _____

Description of Change and Justification (Attach additional sheets if needed.)

Attachments:

☐ PHOTO CONSTRUCTION DRAWING ☐ ADDITIONAL ENVIRONMENTAL ANALYSIS ☐ CORRESPONDENCE ☐ OTHER: ____

Resources:

Biological ☐ NO SENSITIVE RESOURCES PRESENT ☐ SENSITIVE RESOURCES PRESENT ☐ N/A, CHANGE WOULD NOT AFFECT RESOURCE

New Survey Report Attached: ☐ YES ☐ NO

If No, Previous Biological Survey Reference: _____

Cultural ☐ NO RESOURCES PRESENT ☐ RESOURCES PRESENT WITH PROJECT APE: ☐ YES ☐ NO

☐ (PAVED/GRAVEL AREA AND NO GROUND DISTURBANCE)

If in APE, Previous Cultural Survey Reference: _____

If not in APE, attach new survey report.

Other Potential Impacts: (Check any potential changes to permitted impacts and provide details below. Attach additional sheets if needed.)

☐ AIR QUALITY	☐ LAND USE	☐ TRAFFIC
☐ BIOLOGICAL RESOURCES	☐ NOISE	☐ VISUAL
☐ CONTAMINATED SOILS	☐ PALEO RESOURCES	☐ WATER RESOURCES
☐ CULTURAL RESOURCES	☐ SOCIOECONOMIC	☐ WETLANDS
☐ HAZARDOUS MATERIALS	☐ STORM WATER (SWPPP)	

CEQA and Permitting: (Provide details for any "Yes" answer and attach additional information if needed.)

1. Will modification involve substantial changes that will require major changes to the CEQA document?

   ☐ YES ☐ NO

2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts?

   ☐ YES ☐ NO

3. Additional agency notifications and/or permit modifications required? ☐ YES ☐ NO

Conditions of Approval or Reasons for Denial: (Attach additional information if needed.)

Required Signatures: (Attached email approvals may be used in lieu of signatures.)

AT&T Project Manager: ☐ VARIANCE MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION

Name: _____ Signature: _____ Date:

AT&T Lead Environmental Monitor: ☐ FIELD REVIEW COMPLETE

Name: _____ Signature: _____ Date:

AT&T Land Agent: ☐ CONSISTENT WITH EXISTING RIGHTS ☐ NEW RIGHTS OBTAINED

Name: _____ Signature: _____ Date:

CPUC Project Manager: ☐ APPROVED ☐ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) ☐ DENIED

Name: _____ Signature: _____ Date: _