CONDITIONS MONITORING, COMPLIANCE, AND REPORTING PROGRAM

FRONTIER RIVERSIDE 1 PROJECT

RESOLUTION T-17913

REVISION NO. 1

LSA

September 2026

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LIST OF ABBREVIATIONS AND ACRONYMS

3rd Party ECM	3rd Party Environmental Compliance Manager
3rd Party PM	3rd Party Project Manager
ADI	Area of Direct Impact
BIA	Bureau of Indian Affairs
BLM	United States Bureau of Land Management
BMPs	Best Management Practices
BOR	United States Bureau of Reclamation
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDPR	California Department of Parks and Recreation
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CM	Construction Manager
CMCRP	Conditions Monitoring Compliance and Reporting Plan
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
DOI	United States Department of the Interior
ECC	Environmental Compliance Coordinator
ECM	Environmental Compliance Manager
ECPM	Environmental Consultant Project Manager
ESA	Endangered Species Act
ESA	Environmentally Sensitive Area

FCAs	Field Construction Advisors
FFA	Federal Funding Account
IID	Imperial Irrigation District
LEI	Lead Environmental Inspector
LSA	LSA Associates, Inc.
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NTP	Notice to Proceed
PFM	Petition for Modification
PM	Project Manager
PRC	Public Resources Code
Project	Frontier Riverside 1 Project
PTC	Permit to Construct
ROW	Right-of-Way
RRP	Revegetation and Restoration Plan
SB	Senate Bill
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
WEAP	Worker Environmental Awareness Program

1.0 INTRODUCTION

The Frontier Riverside 1 Project (Project) is an approved fiber-optic installation project, which will provide improved broadband connectivity within Riverside County, California, along the North Shore of the Salton Sea. The proposed route begins as two separate routes: one starting just east of the intersection of 70th Street and Hayes Street, and the other starting just east of the intersection of 71st Avenue and Wheeler Street. From these starting points, the routes extend eastward into the North Shore and Desert Beach communities.

On April 30, 2026, the California Public Utilities Commission (CPUC) approved and granted Frontier a California Environmental Quality Act (CEQA) statutory exemption under Senate Bill (SB) 131 for their Federal Funding Account broadband project, Riverside 1.

The SB 131 CEQA Statutory Exemption includes a requirement that "the project incorporates, as a condition of project 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). As a condition of project approval, the CPUC incorporates the environmental protection measures into the Project Resolution (contained in Appendix A of Resolution T-17913) as project requirements. For the purposes of this Project, the environmental protection measures are the same as the conditions of approval and the terms are used interchangeably. This Conditions 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 Frontier and other responsible agencies, 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.

1.1 PROJECT OVERVIEW

Frontier proposes fiber-optic installation to provide improved broadband connectivity within Riverside County, California, along the North Shore of the Salton Sea. The proposed route begins as two separate routes: one starting just east of the intersection of 70th Street and Hayes Street, and the other starting just east of the intersection of 71st Avenue and Wheeler Street. From these starting points, the routes extend eastward into the North Shore and Desert Beach communities (see Figure 1). The Project's Environmental Resources Memorandum, dated January 9, 2026, noted

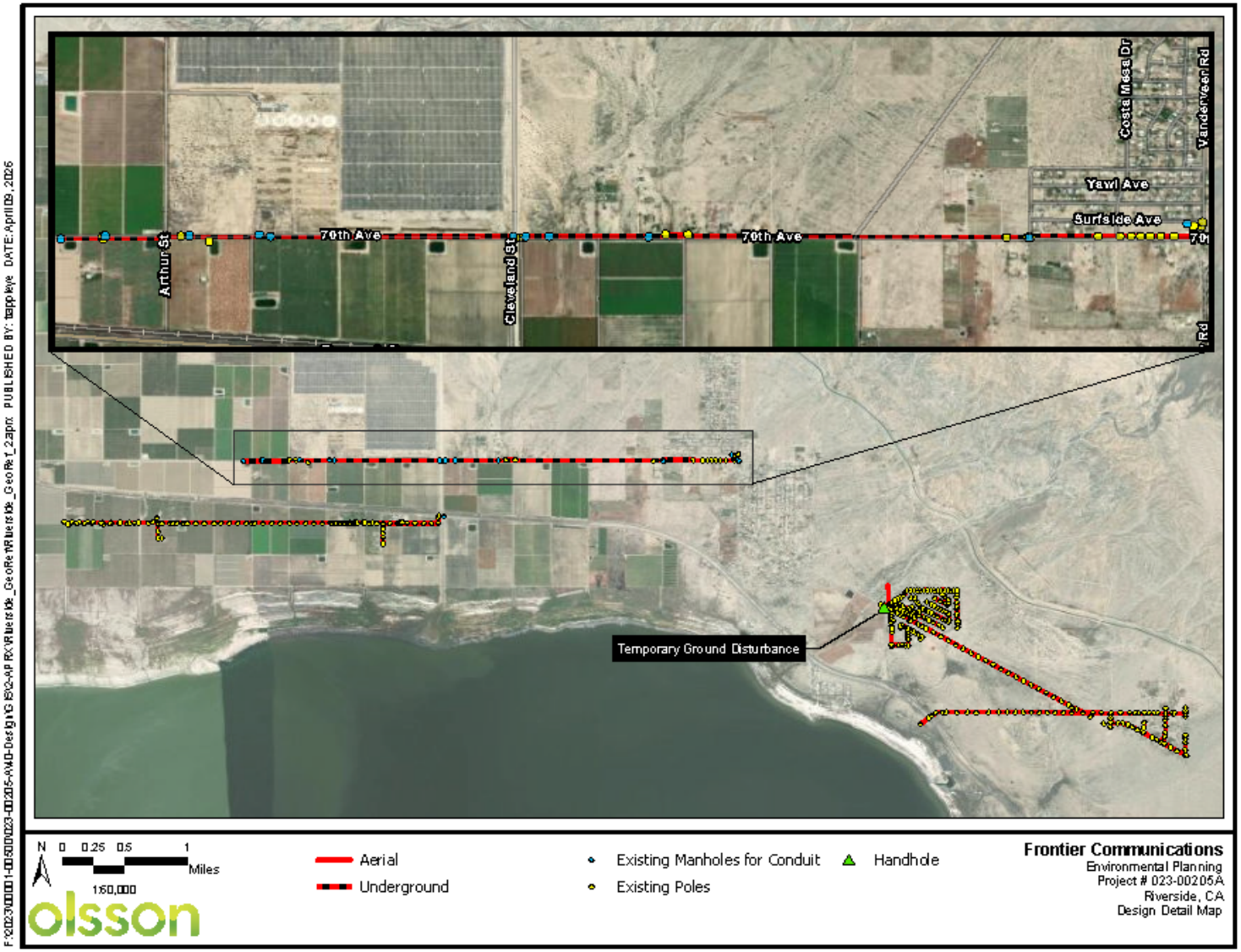


Figure 1: Design Detail Map

that portions of the project corridor overlap the Salton Sea State Recreation Area, owned by the U.S. Bureau of Reclamation (BOR) and managed by the California Department of Parks and Recreation (CDPR), as well as land administered by the U.S. Bureau of Land Management (BLM), Palm Springs/South Coast Field Office, upon further design development. However, based on final design, the Project does not overlap with any federal land jurisdictions.

Project design follows existing utility pathways (i.e., where communications and/or other utility infrastructure is currently present) and will be installed within existing rights-of-way (ROW) and authorized utility easements in areas where previous ground-disturbance activities have occurred.

The Project is approximately 12.05 miles in length and includes two primary aerial segments and one underground route within the Project area to provide fiber-optic connectivity. Approximately 8.75 miles of aerial routes are planned, one segment will be along 71st Avenue beginning at Wheeler Road and another alongside Parkside Drive and Powerline Road, extending into the adjacent community. Aerial fiber will be installed on existing distribution poles within the disturbed ROW. Along 70th Avenue, approximately 3.3 miles of underground fiber will be installed using existing manholes and a 4-inch PVC conduit. No new trenching or ground disturbance is proposed along this segment.

Construction access will occur from previously disturbed ROW areas. Installation activities will primarily involve a bucket truck operating within the ROW to place fiber on existing poles. Further east, one new handhole is proposed within the disturbed ROW to support connectivity. This will involve minimal temporary ground disturbance (approximately 2 feet x 3 feet), which will be restored to existing conditions upon completion. Figure 1 consists of a design detail map, showing underground and aerial routes as well as existing poles, manholes, and proposed handhole locations.

Staging areas include off-site, disturbed areas that currently operate as laydown and staging areas. One staging location will be at Frontier's construction vendor's local office, 2050 Executive Drive, Palm Springs, CA 92262. A second staging location will be at Frontier's local construction office located at 14938 La Paz Drive, Victorville, CA 92392.

The objectives of the Project are as follows:

- Provide improved broadband connectivity within Riverside County, California, along the North Shore of the Salton Sea.
- Remain within existing road ROW to reduce impacts to undisturbed areas and to limit the number of necessary contract parties to a feasible number.
- Avoid or minimize impacts to environmental resources.

The Project segments are located in unincorporated Riverside County, along the North Shore of the Salton Sea. The Project does not cross any state of federal jurisdictional land. The appropriate permits from the California Department of Transportation (Caltrans), County, and Imperial Irrigation

District (IID) will be obtained prior to the start of construction. Table A summarizes the jurisdictions crossed by the Project alignment.

Table A: Jurisdictions Crossed by Frontier's Project

Jurisdiction	Linear Miles of Fiber Optic Line
Federal	
Bureau of Indian Affairs	0
Bureau of Land Management	0
Bureau of Reclamation	0
U.S. Fish and Wildlife Service	0
Subtotal Federal Jurisdiction	*0*
State[1]	
California Department of Fish and Wildlife	0
California State Lands Commission	0
California Department of Parks and Recreation	0
Subtotal State Jurisdiction	*0*
Local (not Federal or State)	
Unincorporated Riverside County	12.05
Subtotal Local Jurisdiction	*12.05*
Total	**12.05**

Source: Frontier (June 2026).

1.1.1 Construction Schedule

Frontier will begin work within 30 days of a CPUC authorized Notice to Proceed (NTP). Frontier will work all project segments concurrently, completing each within a 120-day anticipated schedule. Below is a summary of the anticipated schedule.

- **Days 1–30:** Cable Placement Starts
- **Days 31–60:** Cable Placement Continues, Substructure Placement Starts and Completes
- **Days 61–90:** Cable Placement Continues and Completes
- **Days 91–120:** Splicing/Testing Starts and Completes

CPUC will have access to current and planned construction locations and schedules via Frontier-established Project update calls and weekly and monthly reports.

1.2 CONDITIONS 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, during, and after Project construction.

Frontier's Construction Monitoring, Compliance, and Reporting Plan (which includes measures listed in Appendix A of Resolution T-17913 and mitigation measures required by other agencies) includes protocols that will be followed prior to, during, and after construction by the CPUC's Energy Division staff, Frontier's designated environmental monitors, and project staff.

1.2.1 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.

1.2.2 Program Scope

The scope of the CMCRP is to:

1. List environmental protection measures and their monitoring and reporting requirements, as identified in CPUC Resolution T-17913 for the Project and measures/conditions required by other agencies for the Project (Section 1.2, Table B);
2. Describe the NTP request and approval procedure (Section 3.1);
3. Describe the communication protocols between CPUC, Frontier, and their respective consultants (Sections 2.0 and 3.2);
4. Describe the process by which CPUC staff will observe construction of the Project to ensure implementation of each environmental protection measure (Section 3.3);
5. Describe the process for recording "noncompliance" (i.e., evidence that Frontier is not fully implementing each environmental protection measure) (Section 3.3).

The Project is subject to environmental protections described in the CPUC Resolution T-17913 (included as Appendix A to the Resolution), which are collectively referred to as "Conditions of Approval." These Conditions of Approval are listed in Table B of this CMCRP. To the extent the Resolution conditions expressly rely on, include, or reference permits or approvals from other federal, state, and local agencies, all terms and conditions of such permits or approvals are considered incorporated into the scope of the Resolution conditions. It is the responsibility of the Applicant to obtain the necessary permits and approvals from other federal, state and local agencies, if they have not already done so, prior to start of construction. The terms and conditions of such permits or approvals are to be complied with by the Applicant and incorporated into the 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 Frontier's compliance with Project conditions is checked on a regular basis. Reporting, which comprises written reviews of Frontier's compliance

with the Resolution measures presented to the decision-making body or a designated staff person, ensures that the Lead Agency is informed of Frontier'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.

1.2.2.1 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. Post-construction monitoring by Frontier will continue until compliance with post-construction requirements (i.e., restoration) has been met.

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 B has been prepared to assist the responsible parties in implementing the CMCRP. This table identifies the environmental resource topic, individual environmental measures, monitoring and environmental measure timing, responsible person/agency for implementing the measure, monitoring and reporting procedure, and notation space to confirm implementation of the environmental measures. New numbering of the environmental measures has been added to clearly identify the environmental topic area, followed by the numbering included in the Project's CPUC Resolution in parenthesis (e.g., BIO-1 [Special-Status Plants Best Management Practice (BMP) 1], BIO-2 [Special-Status Wildlife and Native Birds BMP 1], etc.). The order of the environmental measures follows the sequence in Appendix A of the CPUC Resolution for the Project. Additional general compliance measures as specified in SB 131 (Statutes 2025, Chapter 24), Public Resources Code Section 21080.51, and Federal Funding Account (FFA) Grant Awardee Requirements and referenced in the Project's CPUC Resolution have also been added (i.e., COMP-1 through COMP-5 and UTIL-1).

The column categories identified in the CMCRP table (Table B) are described below.

- **Environmental Measure:** This column lists the environmental measures by number.
- **Frontier Verification Requirements and CPUC Monitoring:** This column lists the verification requirements for which Frontier will be responsible to demonstrate compliance with each measure, and monitoring tasks and requirements of the CPUC 3rd Party Environmental Monitors.

- **Monitoring Activity/Timing/Frequency/Schedule:** 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/Verification:** This column identifies the responsible party for complying with the requirements of the environmental measure, and provides space for verification initials and date.
- **Responsibility for Oversight of Compliance/Verification:** This column provides the agency responsible for oversight of the environmental measure and is to be dated and initialed by the agency representative based on the documentation provided by the construction contractor or through personal verification by agency staff.
- **Outside Agency Coordination:** This column lists any agencies with which the CPUC may coordinate for implementation of the environmental measure.
- **Comments:** This column provides space for written comments, if necessary.

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
Biological Resources						
BIO-1 (Special Status Plants BMP 1): Work within Previously Disturbed Corridors - Frontier plans to perform construction activities in existing road shoulders, rights-of-way, and previously disturbed surfaces and areas reasonably adjacent thereto, to the extent necessary to construct the funded network, to reduce new ground disturbance and mitigate potential encroachment into native vegetation or drainages.	Prior to mobilization, Frontier shall delineate the Area of Direct Impact (ADI) for the Project, including staging areas and access routes. Frontier shall confine all equipment, vehicles, and construction work within these areas. Signage shall be used to clearly direct construction traffic to and from approved access routes work areas. No work, staging, or ground disturbance shall occur outside of these approved access routes and work areas. Frontier will submit resumes of qualified biologists to CPUC for review and approval prior to the start of any surveys. Pre-construction surveys for special-status plant species shall be conducted by Frontier's approved qualified biologist within the Project ADI. The locations of the special-status plants identified during previous surveys and the pre-construction survey shall be marked as additional avoidance areas where possible both in the field using flagging, staking,	Prior to and during construction	Within the ADI	Frontier/CPUC	--	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	fencing, or similar devices; and on construction plans. Special-status plant species populations shall be avoided where feasible. CPUC shall verify that special-status plant species surveys are completed by a qualified biologist and that avoidance areas identified during the surveys are demarcated and avoided during construction.					
BIO-2: (Special Status Wildlife and Native Birds BMP 1): Pre-construction Surveys for Mojave Desert Tortoise - Frontier is prepared to engage a qualified biologist to conduct clearance pre-construction surveys in areas of potentially suitable desert scrub and alluvial habitat to confirm there are no active tortoise burrows or individuals within the planned work area.	No more than 30 days prior to the start of construction, Frontier's CDFW-approved biological monitor(s) shall conduct pre-construction clearance surveys for Mojave Desert Tortoise, using the methods described in the current United States Fish and Wildlife Service (USFWS) Desert Tortoise (Mojave Population) Field Manual. The results of the pre-construction Mojave Desert Tortoise survey shall be summarized into a report and provided by Frontier to the CDFW and USFWS for review and approval prior to the start of construction.	Prior to construction	All areas of temporary and permanent disturbance	Frontier/CPUC	CDFW and USFWS	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	CPUC shall verify that pre-construction surveys are completed and that any additional follow-up surveys, monitoring, or avoidance or relocation of desert tortoise, as required by the results of the surveys are implemented.					
BIO-3 (Special Status Wildlife and Native Birds BMP 2): Pre-Construction Surveys for Burrowing Owl - Frontier is prepared to engage a qualified biologist to conduct pre-construction surveys consistent with California Department of Fish and Wildlife's Burrowing Owl Mitigation Guidelines to help avoid disturbance of occupied burrows.	Frontier's CDFW-approved biologist, who is familiar with the species' life stages and habits, will conduct pre-construction surveys for burrowing owl. The surveys shall be conducted in consistency with the 2012 CDFW Staff Report on Burrowing Owl Mitigation, Take Avoidance (Pre-construction) Surveys. Upon completion of the surveys, Frontier will submit a letter report in electronic format describing the survey methodologies and results of the pre-construction burrowing owl surveys to CDFW and provide a copy to CPUC. If survey results are positive, additional follow-up surveys, monitoring, or avoidance or relocation of owls may be required prior to any further on-	Prior to and during construction	All areas of temporary and permanent disturbance	Frontier/CPUC	CDFW/USFWS (if species determined to be present)	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	site construction activities and would be conducted in coordination with the CDFW. CPUC verifies that pre-construction surveys are completed and that any additional follow-up surveys, monitoring, or avoidance or relocation of owls, as required by the results of the surveys are implemented.					
BIO-4 (Special Status Wildlife and Native Birds BMP 3): Migratory Bird Nest Avoidance - Frontier intends to schedule planned vegetation clearing and surface disturbance activities outside the nesting season (February 1–August 15). If work must occur during this time period, Frontier is prepared to engage a qualified biologist to conduct pre-construction nesting-bird surveys to comply with the Migratory Bird Treaty Act (MBTA) and California Department of Fish and Wildlife regulations.	If construction or vegetation clearing will occur during nesting season (February ~~15~~ 1 through August 15), a pre-construction nesting-bird survey(s) shall be conducted by Frontier's qualified biologist in compliance with the MBTA and CDFW regulations. Frontier will submit resumes of qualified biologists to CPUC for review and approval prior to any surveys. Prior to the start of any pre-construction site mobilization, Frontier shall provide CDFW (and copy CPUC) a letter-report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity	Prior to and during construction	All areas of temporary and permanent disturbance	Frontier/CPUC	CDFW	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	and qualifications of the surveyor(s); and a list of species observed. If no nesting birds or active nests are observed during the pre-construction surveys, Project activities may begin and no further measures will be required. If active nests are detected during the survey, the report shall include a map or aerial photo identifying the location of the nest and shall depict the boundaries of the no-disturbance buffer zone around the nest, and a monitoring plan shall be submitted to CDFW for review and approval. Additional copies shall be provided to CPUC. CDFW approval of the plan is required before construction may commence. CPUC shall verify that pre-construction surveys are completed and that exclusionary buffers are established, as required by the results of the surveys.					

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
BIO-5 (Special-Status Wildlife and Native Birds BMP 4): Spot Biological Monitoring During Construction - Frontier is prepared to retain a qualified biological monitor to collaborate with the construction team and conduct intermittent monitoring during construction, if required, to confirm adherence to avoidance measures for identified sensitive biological resources, if applicable.	Frontier shall consult with CDFW to determine the appropriate level and frequency of monitoring required for sensitive biological resources based on results of the pre-construction surveys described in Measures BIO-2 through BIO-4. Frontier will submit resumes of qualified biologists to CPUC for review and approval prior to any monitoring or surveys. Frontier shall submit resumes for a qualified biological monitor(s) to CDFW for approval prior to start of site mobilization. CPUC shall verify that Frontier's biological monitor(s) have been approved by CDFW prior to initiation of construction. Any new biological monitor(s) are to be approved by CDFW prior to starting work.	Prior to and during construction	Entire Project Area	Frontier/CPUC	CDFW	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
BIO-6 (Special Status Wildlife and Native Birds BMP 5): Qualified Biological Monitor - Frontier plans to undertake the following avoidance actions, as needed: hire a qualified biological monitor to support the project during construction; require contractors to stop work should the construction team observe a sensitive biological resource (e.g. burrowing owl, an occupied burrow, or desert tortoise) within the active work area during construction; and notify the qualified biologist/biological monitor of the observed sensitive biological resource. If engaged, the qualified biologist shall be responsible for confirming species identification, establishing a clearly marked no-disturbance exclusion zone consistent with California Department of Fish and Wildlife guidance, and specifying appropriate avoidance measures (e.g., adjusted work methods and monitoring) to mitigate impacts to the identified sensitive biological resource. If the above procedure is triggered, Frontier intends to restrict resumption of active construction in the affected area until the foregoing has been completed and can be resumed consistent with the specified avoidance measures.	Frontier shall consult with CDFW to determine the appropriate level and frequency of monitoring required for sensitive biological resources based on results of the pre-construction surveys described in Measures BIO-2 through BIO-4. Frontier will submit resumes of qualified biologists to CPUC for review and approval prior to any monitoring or surveys. CPUC shall ensure that the level of monitoring suggested by CDFW (and/or USFWS) is implemented by Frontier. CPUC shall verify that the appropriate number of CDFW-approved biologists are present at the frequency recommended by CDFW and/or USFWS. CPUC shall verify that sensitive biological resource exclusion areas (buffers) are demarcated and enforced.	Prior to and during construction	Entire Project Area	Frontier/CPUC	CDFW and/or USFWS	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	Frontier shall ensure and CPUC shall verify that construction ceases in the immediate vicinity of an identified special-status species, that appropriate buffers are established by the CDFW-approved biological monitor, and that work does not re-commence in the buffer until authorized by the monitor. Frontier shall ensure and CPUC shall verify that any sensitive wildlife relocation is conducted by the CDFW-approved biological monitor and with prior approval under the appropriate federal and state regulations and in consultation with CDFW and/or USFWS.					
BIO-7 (Special Status Wildlife and Native Birds BMP 6): Worker Awareness Training - Frontier plans to provide/ require that construction personnel receive environmental awareness training addressing sensitive resources, approved work areas, nesting bird protections, and stop-work procedures. Training may be provided through a variety of standard training methods, including written documentation /or, a preconstruction meeting.	Frontier's qualified biologist shall prepare a project-specific Worker Environmental Awareness Program (WEAP) training. The WEAP training materials are to be reviewed and approved by the CDFW (with a copy to CPUC) prior to commencing construction activities (including staging vehicles or equipment). The WEAP training shall instruct personnel how to identify	Prior to construction and during construction as needed for new construction personnel	Entire Project Area	Frontier/CPUC	CDFW	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	sensitive resources and the required protection measures for sensitive resources. Personnel shall be instructed about the roles and responsibilities in protecting sensitive biological resources, including penalties for violations, requirements for stopping work immediately and notifying the Project's qualified biologist if sensitive resources are encountered, and instructed that handling and relocating special-status species by nonapproved personnel shall be prohibited. The WEAP training is to be presented to all on-site personnel prior to beginning work. WEAP training acknowledgement forms are to be signed by all personnel upon completion of the WEAP training and shall be kept on file by Frontier for the duration of project construction. CPUC shall verify that the WEAP training materials are approved by CDFW prior to the start of construction (including staging					

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	of vehicles or equipment). CPUC shall ensure that WEAP training acknowledgement forms are being completed by all personnel upon prior to beginning work.					
Cultural Resources						
CUL-1 (Cultural Resources BMP 1): Inadvertent Discovery of Human Burials - In the event human burials are inadvertently discovered during construction, Frontier understands the first notification should be to the coroner, consistent with California Health and Safety Code §7050.5. If the remains are determined to be Native American, Frontier understands that the Native American Heritage Commission is to be notified so that a Most Likely Descendant can be designated pursuant to Public Resources Code §5097.98.	In the event that an inadvertent discovery of human remains or burials occur, Frontier shall implement the measure as described in Measure CUL-1 and notify the CPUC within 24 hours. CPUC shall verify that any discovery of human remains is addressed as required in Measure CUL-1.	During construction	Entire Project Area	Frontier/CPUC	County/Tribes	
CUL-2 (Cultural Resources BMP 2): Environmentally Sensitive Areas - Frontier plans to delineate environmentally sensitive areas (ESA) on project plans, to the extent feasible, to guard against ground disturbance activities occurring within the boundaries of cultural resource sites.	Prior to ground-disturbing activities, Frontier ~~shall prepare a map of ESAs.~~ have a U.S. Secretary of the Interior's (SOI) Qualified Archaeologist review project plans and establish ESAs to be avoided during Project construction. CPUC shall verify the accuracy of the ESA map prior to start of construction.	Prior to ground-disturbing activities and during construction	In the vicinity of the sites listed in the Project's cultural study report	Frontier/CPUC	--	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	Avoidance areas are to be staked and flagged by Frontier prior to the start of construction. Integrity of the ESAs shall be maintained by Frontier during construction. The CPUC shall inspect the ESAs on a regular basis throughout the construction cycle to ensure compliance with Measure CUL-2.					
Hydrology/Water Quality						
WQ-1 (Hydrology/Water Quality BMP 1): Erosion and Sediment Control Best Management Practice (BMP) - Frontier plans to use standard BMPs such as fiber rolls, silt fencing, and stabilized staging areas, where appropriate, to help prevent sediment discharge to nearby drainages.	Frontier shall obtain permits and approvals from the Regional Water Quality Control Board (RWQCB), CDFW, and any other agencies, as applicable. Frontier shall install BMPs prior to start of construction and perform regular inspections of Project BMPs throughout construction to prevent sediment discharge to nearby drainages and provide summary inspection reports to the CPUC. CPUC shall verify that applicable permits are in place prior to the start of construction (if applicable), and verify that BMP inspections are completed by Frontier during construction.	Prior to and during construction	Entire Project Area	Frontier/CPUC	--	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
Other Conditions [as Specified in SB-131 (Statutes 2025, Chapter 24), Public Resources Code Section 21080.51, and FFA Grant Awardee Requirements]						
COMP-1 (Compliance with Other Agency Requirements): Compliance with Applicable State and Federal Laws and Conditions Imposed by a City or County - Frontier shall comply with all conditions otherwise 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.	Frontier shall provide copies of all permits or verification from agencies that resources are avoided and permits are not required. CPUC shall verify that Frontier has obtained all necessary permits and has complied with all permit conditions and requirements.	Prior to construction	Entire Project Area	Frontier/CPUC	Caltrans/ USACE/ USFWS/ BLM/ SWRCB/ RWQCB/ CDFW/ BOR/ CDPR/ IID/ County	
COMP-2: Public Agency Notification - Per PRC Section 21080.51, Frontier shall 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.	Frontier shall provide documentation that the appropriate public agency notifications have been completed prior to the start of construction. CPUC shall verify that Frontier completes public agency notifications prior to start of construction.	Prior to construction	Entire Project Area	Frontier/CPUC	Caltrans/ USACE/ USFWS/ BLM/ SWRCB/ RWQCB/ CDFW/ BOR/ CDPR/ IID/ County, etc.	

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
COMP-3: – Public Notification - Per California Public Resources Code (PRC) Section 21080.51, Frontier shall provide notice to the public in the area affected by the project in a manner consistent with subdivision (b) of California PRC Section 21108.	Frontier shall provide documentation that public notifications have been completed prior to the start of construction. CPUC shall verify that Frontier completes public notifications prior to start of construction.	Prior to construction	Entire Project Area	Frontier/CPUC	–	
COMP-4: Private Right-of-Way and Private Property - Per PRC Section 21080.51, in the case of private rights-of-way over private property, Frontier shall receive from the underlying property owner permission for access to the property.	Frontier shall provide documentation that the appropriate public rights-of-way and private property access permissions have been received prior to the start of construction. CPUC shall verify that Frontier receives access permissions to private rights-of-way and private property prior to start of construction.	Prior to construction	Entire Project Area	Frontier/CPUC	–	
COMP-5: Site Restoration – Per PRC Section 21080.51, Frontier shall ensure that surface areas where project related ground disturbance occurs, shall be restored to a condition existing before the project.	Frontier shall prepare and implement a Revegetation and Restoration Plan (RRP). The plan shall be submitted by Frontier for review and approval by the CPUC and any other applicable jurisdiction (e.g., Caltrans, County, etc.). CPUC to verify that a qualified biologist has been consulted to determine the minimum amount	Prior to, during, and after construction	All Project areas	Frontier/CPUC	Caltrans, County	–

Table B: Conditions of Approval and Preliminary Plan for Verification and Monitoring

Conditions/Environmental Measures	Frontier Verification Requirements and CPUC Monitoring	Monitoring Activity/Timing/ Frequency/ Schedule	Location	Implementation Responsibility/ Oversight Verification	Outside Agency Coordination	Comments
	of ground disturbance and vegetation to be removed. CPUC to verify compliance with the RRP.					
UTIL-1: Utility Company Coordination - The Applicant shall notify all utility companies with utilities located within or crossing the project right-of-way to locate and mark existing underground utilities along the entire length of the project prior to construction. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. In the event of a conflict, areas of subsurface excavation or pole installation shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering. In instances where separation between third-party utilities and underground excavations is less than 5 feet, the Applicant shall satisfy the requirements of California Government Code Section 4216. Construction methods shall be adjusted as necessary to assure that the integrity of existing utility lines is not compromised.	Frontier shall notify utility companies in accordance with UTIL-1 prior to the start of construction. CPUC shall verify that Frontier has notified all utility companies and that underground utilities have been marked. CPUC shall verify that Frontier has provided construction methods that satisfy the requirements of California Government Code 4216 if the separation between the utility and the Project is less than 5 feet.	Prior to construction	Entire Project Area	Frontier/CPUC	–	–

1.2.2.2 Authority

Pursuant to California Public Resources Code (PRC) 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.

1.2.2.3 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.

Frontier's Riverside 1 Project is long and linear, potentially requiring land use and natural resources permits from other federal, state, and local agencies. The Project's environmental resources analysis and supporting technical studies, CPUC Resolution, and environmental protection measures/ conditions are meant to support agencies' discretionary decisions (see Table C) and address compliance and impacts under the following acts:

- 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)
- Clean Air Act (40 CFR 50 et seq)
- Clean Water Act (40 CFR 100 et seq)
- Federal Endangered Species Act (50 CFR 17)
- Federal Land Policy and Management Act Sec. 501 [43 U.S. Code 1761]
- Migratory Bird Treaty Act (50 CFR 21)
- National Historic Preservation Act (36 CFR 80)
- National Environmental Policy Act (40 CFR 1500–1508)

Table C: Agency Permits and Approvals

Agency/Group	Jurisdiction/Status	Permit Or Consultation
Federal		
DOI, Bureau of Land Management (BLM)	Not applicable. Project does not cross BLM land.	Right-of-way Authorization to construct the Project where it crosses BLM-managed federal lands.
DOI, Bureau of Land Management (BLM)	Fieldwork Authorizations not required as Project does not cross BLM land.	Authorization of monitoring of BLM lands inside of the Caltrans ROW.
DOI, Bureau of Reclamation (BOR)	Not applicable. Project does not cross BOR land.	Right-of-way Authorization to construct the Project where it crosses BOR managed parks.
DOI, Bureau of Indian Affairs (BIA)	Not applicable as Project does not cross Tribal Lands.	Right-of-way Authorization to construct the Project where it crosses Tribal lands managed by BIA on behalf of and with the consent of the applicable Tribe(s).
United States Army Corps of Engineers (USACE)	Not applicable as there is no work within Waters of the United States, including wetlands. Jurisdictional waters of the U.S. avoided.	Consultation with the USACE, Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife (CDFW), and USFWS regarding requirements for a Clean Water Act Section 404 permit.
DOI, United States Fish and Wildlife Service (USFWS)	Not applicable as Project does not cross any national wildlife refuges.	Right-of-Way permit needed for encroachment across a National Wildlife Refuge.
DOI, United States Fish and Wildlife Service (USFWS)	Take of T&E species avoided and no permit is required for the Project. ***Pre-construction surveys for federally listed species (Desert Tortoise) will occur prior to the start of construction.***	Take authorization (if required) and consultation with the USFWS. Consultation for Section 7 or 10 of the Federal Endangered Species Act.
State		
California Public Utilities Commission	CEQA lead agency, Statutory Exemption, overall approval of the Project. ***CEQA Statutory Exemption approved April 30, 2026.*** ***Issuance of Notice to Proceed (NTP) pending.***	Approval of CEQA Statutory Exemption.
California Department of Fish and Wildlife (CDFW)	Take of Threatened & Endangered (T&E) species and streambed alteration avoided. ***Survey for state listed species (plants, nesting birds and burrowing owl) will be conducted prior to the start of construction.***	Take authorization (if required) and consultation with the USFWS. Consultation for Section 2081 of the California Endangered Species Act. Consultation for Section 1600 of the California Fish and Game Code (Streambed Alteration Agreement).
California Department of Transportation (Caltrans)	***Caltrans encroachment permit issued.***	Caltrans requires that all work done within, under, or above a state or interstate highway right-of-way obtain an encroachment permit. A Transportation Permit required for oversize and/or overweight truck loads that exceed the limits of a legal load as defined by Division 15 of the California Vehicle Code. Modifications to state facilities must meet mandatory design standards and specifications.

Table C: Agency Permits and Approvals

Agency/Group	Jurisdiction/Status	Permit Or Consultation
California State Water Resources Control Board	Not applicable as no discharge will occur within a state water and/or waters of the United States (WOTUS). In addition, temporary ground disturbance is less than 1 acre and no National Pollutant Discharge Elimination System (NPDES) is needed.	Notice of Intent to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Orders 2010-0014-DWQ and 2012- 0006-DWQ and Section 401 Permit associated with issuance of a Clean Water Act Section 404 Permit.
Local		
Riverside County	***Encroachment permits for construction in County rights-of-way have been issued, but have expired (permit extensions pending).***	Encroachment permit for use of County road rights-of-way.
Imperial Irrigation District (IID)	***IID approval of Utility Pole Attachment has been issued for one segment of Project, others pending.***	IID requires approval for attachment to their utility poles through the submittal of a Utility Pole Attachment Request Application.
Tribal		
Native American Consultation	***Native American/Tribal outreach conducted by Frontier and did not result in a request for additional coordination or project involvement to date.***	Native American/Tribal consultation.

2.0 ROLES AND RESPONSIBILITIES

Section 2 describes Frontier specific and CPUC specific roles and responsibilities for the Project. Section 2.2 describes the CPUC's monitoring responsibilities for the Project, ensuring that Frontier has adequately implemented environmental measures, and ensuring that construction activities are consistent with the CPUC Resolution for the Project.

2.1 FRONTIER ROLES AND RESPONSIBILITIES

Frontier 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 other federal, state, and local agencies. Frontier 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, permit conditions, and CMCRP.

2.1.1 Frontier Project Manager

Role and Responsibility. Frontier's project manager (PM) will provide the overall direction, management, leadership, and corporate coordination for the Project, and will be CPUC's primary point of contact. Frontier'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 agency permitting requirements. Frontier's PM will lead environmental compliance throughout the duration of construction for the Project, including direction development and implementation of pre- construction environmental planning, permitting, and compliance activities; the environmental inspection and pre-construction survey program; and the Worker Environmental Awareness Program (WEAP). The PM will be assisted by Frontier's environmental consultants and the Construction Manager (CM). The Frontier PM is the primary compliance point of contact for the Frontier Project team.

The Frontier PM's responsibilities include but are not limited to:

- Leading coordination among engineering, construction management, contractors, and environmental staff for Frontier;
- Leading coordination between Frontier staff, contractors, and regulatory agencies to ensure that all agency requirements are met;
- Leading the integration of environmental responsibilities into all levels of Project construction activities;
- Ensuring compliance with Project environmental measures, as well as any other Project environmental policies, guidelines, and procedures;
- Ensuring compliance with other agency requirements and permits;

- Ensuring that data, including work schedule, location, and critical issue information, are provided to members of the Project construction team as needed;

- Communicating Project activities, schedules, and environmental and public relations issues to the Project team as needed.

Reporting Relationship. The Frontier PM is to serve as the primary point of contact to the CPUC PM and other regulatory agencies. The Frontier PM gives direction to Frontier's construction manager, contractors, and environmental compliance team.

Communication. The Frontier PM communicates with the CPUC and regulatory agencies, including all members of the Project environmental compliance team. The Frontier PM also oversees all communication with Frontier contractors and team members.

2.1.2 Frontier Construction Manager

Role and Responsibility. The construction manager (CM) will be responsible for overall construction management. Duties include making daily construction work schedules available to on-site construction personnel and monitors, as well as describing the nature and extent of scheduled construction activities to ensure that adequate monitoring resources are provided. The CM will also ensure that construction schedules are provided to the Frontier PM so they in turn are provided to the CPUC PM a as part of the Weekly Status Report. The CM may be supported by Field Construction Advisors (FCAs) and may delegate responsibilities to the FCAs. The CM or FCAs will report compliance issues to the Frontier environmental compliance team and Frontier PM.

Key environmental responsibilities for the CM and FCAs include but are not limited to:

- In conjunction with the Frontier PM, verifying that all construction workers attend the Project environmental training program (WEAP) prior to beginning work;

- Reviewing and understanding CPUC and other regulatory agency environmental requirements for the Project;

- In conjunction with the Frontier PM, implementing and maintaining compliance with environmental protection requirements, measures, and conditions during construction, including adopted environmental measures, and all Project permits and measures from other regulatory agencies.

Reporting Relationship. The Frontier CM reports to the Frontier PM and the Frontier environmental compliance team. The Frontier CM gives direction to FCAs and construction site personnel, and provides schedule and health and safety information to monitors.

Communication. The Frontier CM communicates with the Frontier PM and all members of the Project environmental compliance team. The Frontier CM also oversees all communication with subcontractors, FCAs, and construction site personnel. The Frontier CM communicates schedule to the monitors.

2.1.3 Frontier Environmental Compliance Coordinator

Role and Responsibility. Frontier's Environmental Compliance Coordinator (ECC) is the primary contact for environmental compliance, responsible for providing support to the Frontier PM for successful implementation and compliance under the CMCRP and all other applicable environmental permits. The Frontier ECC is responsible for supporting the Frontier PM by attending construction and Project management meetings; reviewing and submitting regular submittals during construction; reviewing and tracking compliance with Project CMCRP, permits, plans, and regulations; reviewing daily and weekly monitoring reports during construction; and immediately reporting any environmental compliance issues to the Frontier PM.

Reporting Relationship. The Frontier ECC reports to the Frontier PM and supports the Frontier PM in directing the work of the Frontier environmental compliance team and resource specialists.

Communication. The Frontier ECC communicates with the Frontier PM, the environmental compliance team, and monitors.

2.1.4 Frontier Environmental Consultant Project Manager

Role and Responsibility. Frontier's Environmental Consultant Project Manager (ECPM) is responsible for providing support to the Frontier ECC and PM for successful implementation and compliance under the CMCRP and all other applicable environmental permits, and provides back-up in the ECC's absence. The ECPM is responsible for supporting the Frontier PM and ECC by managing the drafting of Notices to Proceed (NTPs) and minor Project refinement requests, the development of pre-construction plans and documents, supporting Frontier with obtaining all required environmental permits, reviewing Frontier-prepared plans to ensure compliance with CMCRP requirements, and attending construction and Project management meetings. The Frontier ECPM supports the Frontier PM and ECC in all environmental management activities.

Reporting Relationship. The Frontier ECPM reports to the Frontier PM and ECC and supports the PM and ECC in directing the work of the Frontier environmental compliance team and resource specialists.

Communication. The ECPM communicates with the Frontier PM, ECC, the environmental compliance team, and monitors.

2.1.5 Lead Environmental Inspector

Role and Responsibility. Frontier's Lead Environmental Inspector (LEI) is responsible for overseeing and verifying the day-to-day on-site compliance effort. The Frontier LEI will work closely with construction personnel and will be the primary field employee responsible for verifying and documenting environmental compliance. Multiple Frontier LEIs may be needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The Frontier LEI's responsibilities will include:

- Supporting the Frontier PM in the completion of all necessary resource surveys, supporting the PM, ECC, and resource specialists in implementation strategy of the biological measures in the

CMCRP and all plan and permit conditions relevant to resources during the pre-construction, construction and post-construction phases of the Project;

- Providing quality assurance/quality control of all deliverables;
- Coordinating with Frontier regarding landowner access for surveys and construction activities;
- Participating in weekly or bi-monthly meetings;
- Managing implementation of the WEAP in the field, including management of training logs.

Reporting Relationship. The LEI reports to the Frontier ECC, the ECPM, and the PM.

Communication. The Frontier LEI communicates with the Frontier PM, the ECC, the ECPM, the environmental compliance team, and the construction team to coordinate monitoring and implement Project environmental compliance requirements.

2.1.6 Frontier Environmental Monitors

The Frontier environmental monitors are the primary field staff responsible for evaluating, documenting, and verifying compliance of construction activities with all applicable requirements. The environmental monitors for Frontier will be led by Frontier's LEI, ECC, and ECPM under the direct supervision of the Frontier PM. The ECC and LEI will coordinate the activities of the Project environmental monitors to comply with each environmental measure. Frontier's environmental monitors 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 Frontier as needed and as required to protect sensitive biological, archaeological, historic, and Native American resources, as well as ensure protection of water quality through the implementation of Erosion and Sediment Control BMPs.

Reporting Relationship. The Frontier environmental monitors report directly to the LEI and ECC, and to the ECPM in the ECC's absence.

Communication. The Frontier environmental monitors communicate with the LEI and ECC regarding the status of monitoring and compliance in the field. The LEI and ECC in turn will communicate with the CPUC 3rd Party Environmental Compliance Manager as needed during construction.

The Frontier LEI will be on site on a daily basis to coordinate environmental monitors (such as biologists), assist construction crews with interpreting environmental measures, and help correct compliance problems in a timely manner. The Project's environmental protection measures/ conditions or documents outlined in Table D require Frontier to supply an environmental monitor with specific qualifications.

Table D: Environmental Monitors Required During Construction

Environmental Monitor	Related Measures/Conditions or Documents
Biological Monitor	BIO-1 through BIO-6
~~Archaeologist~~ Cultural Resources ESA Inspector	CUL-2
BMP Inspector	WQ-1

2.2 CALIFORNIA PUBLIC UTILITIES COMMISSION ROLES AND RESPONSIBILITIES

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

2.2.1 California Public Utilities Commission Project Manager

The CPUC PM has overall responsibility for determining the effectiveness of compliance with environmental requirements based on the success criteria included for each environmental measure. 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 3.3.5) and NTPs will be submitted to the CPUC PM for review and approval. The CPUC PM will issue NTPs for construction of each phase of the Project, if the Project will have more than one construction phase. Currently, Frontier does not anticipate construction to be phased. 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 3.2.

Frontier'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.

2.2.1.1 CPUC 3rd Party Project Manager

Role and Responsibility. LSA Associates, Inc. (LSA) will be providing 3rd party project management services to the CPUC. CPUC's 3rd Party Project Manager (3rd Party PM) is responsible for providing oversight to the CPUC PM for Frontier's successful implementation, compliance, and reporting under the CMCRP and all other applicable environmental permits. The 3rd Party PM is responsible for reviewing the Notices to Proceed (NTPs) and minor Project refinement requests, reviewing all required environmental permits obtained by Frontier, reviewing Frontier-prepared plans to ensure compliance with CMCRP requirements, and attending construction and Project management meetings. The 3rd Party PM supports the CPUC PM in all management activities.

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

Communication. The 3rd Party PM communicates with the CPUC PM and the 3rd Party Environmental Compliance Manager (3rd Party ECM).

2.2.1.2 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 the 3rd Party PM for oversight of Frontier'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 Frontier's regular submittals during construction; reviewing and tracking Frontier's compliance with Project CMCRP, permits, plans, and regulations; and reviewing daily and weekly Frontier 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 monitors and resource specialists.

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

2.2.1.3 CPUC 3rd Party Environmental Monitors

The CPUC 3rd Party environmental monitors are the primary field staff responsible for evaluating, documenting, and verifying Frontier's compliance of construction activities with all applicable requirements. The CPUC 3rd Party environmental monitors will be led by LSA's ECM under the direct supervision of the 3rd Party PM. The ECM will coordinate the activities of the CPUC 3rd Party environmental monitors, including biological and archaeological monitors, to comply with each environmental measure. The CPUC 3rd Party environmental monitors will work to ensure that Frontier completes the required pre-construction surveys and environmental measures are effectively implemented during construction. LSA shall engage resource specialists as needed to provide guidance for protecting sensitive biological, archaeological, historic, and Native American resources.

Reporting Relationship. The CPUC 3rd Party environmental monitors report to the LSA ECM.

Communication. The CPUC 3rd Party environmental monitors communicate with the LSA ECM regarding the status of monitoring and compliance in the field. LSA's environmental monitors will also interact with Frontier's CM as needed, during construction.

2.2.2 Permitting Agencies' Role

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

The CPUC will typically coordinate with Frontier 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 Frontier obtain input from the permitting agency or that Frontier 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 federal, state, and local government agencies involved in the environmental review and permitting of the Project are shown in Table C. Coordination with additional agencies and local jurisdictions may be needed as the Project progresses.

3.0 PROCEDURES

This section contains CMCRP procedures for the personnel identified in Section 2. 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.

3.1 PRE-CONSTRUCTION COMPLIANCE VERIFICATION

3.1.1 Pre-Construction Environmental Measures

The CPUC will verify compliance with pre-construction environmental measures prior to construction. If required by the environmental measure, Frontier must obtain approval of all necessary resource-specific plans, verify that permitting requirements of other agencies have been met, and perform all required surveys and studies before construction begins (Table E). The purpose of the pre-construction process is to complete all required actions so that the CPUC can issue NTP(s) for the Project.

Table E: Plans, Reports, and Other Documents Required for Compliance Verification

Item	Conditions/ Environmental Measure	Responsible Action Agency
Pre-Construction Special Status Plant Surveys	BIO-1	CPUC, CDFW
Pre-Construction Desert Tortoise Surveys	BIO-2	CPUC, CDFW
Pre-Construction Burrowing Owl Surveys	BIO-3	CPUC, CDFW
Pre-Construction Nesting Bird Surveys	BIO-4	CPUC, CDFW
Biological Monitors	BIO-5, BIO-6	CPUC, CDFW
Worker Environmental Awareness Program (WEAP) Training	BIO-7	CPUC, CDFW
Inadvertent Discovery of Human Remains	CUL-1	CPUC, County, Tribes
Historical Environmentally Sensitive Area (ESA) Map	CUL-2	CPUC, Tribes
Stormwater BMPs	WQ-1	CPUC
Resource Impact Permits or Verification that Permits are not needed	COMP-1	CPUC
Obtain Necessary Permits and Permissions	COMP-1	CPUC, BLM, BOR, CDPR, USFWS, Caltrans, IID, Riverside County,
Public Agency Notifications	COMP-2	Caltrans/USACE/USFWS/BLM/SWRCB/ RWQCB/CDFW/BOR/CDPR/IID/ County
Public Notification	COMP-3	CPUC
Private Right-of-Way and Private Property Access Permission	COMP-4	CPUC
Revegetation and Restoration Plan (RRP)	COMP-5	Caltrans, County
Utility Company Coordination	UTIL-1	CPUC

BLM = Bureau of Land Management
BOR = Bureau of Reclamation
Caltrans = California Department of Transportation
CDFW = California Department of Fish and Wildlife
CDPR = California Department of Park and Recreation
CPUC = California Public Utilities Commission
ESA = Environmentally Sensitive Area
IID = Imperial Irrigation District
RWQCB = Regional Water Quality Control Boards
SWRCB = State Water Resources Control Board
USFWS = United States Fish and Wildlife Service
WEAP = Worker Environmental Awareness Program

3.1.2 Notice to Proceed Process

Frontier is required to obtain CPUC authorization prior to initiating construction activities through the NTP process. The NTP process involves Frontier submitting a NTP request to the CPUC and the CPUC PM issuing the NTP authorization letter. The Energy Division will not authorize construction activities until all relevant pre-construction requirements are completed as appropriate for the relevant stage of the Project. Before granting an NTP, the Energy Division will confirm that the Applicant has complied with all pre-construction environmental measures, including specified surveys, and has obtained all appropriate approvals from other regulatory agencies. The CPUC PM may authorize Project activities through one or more NTPs for separate phases of the Project as determined necessary. Frontier 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 the Resolution T-17913 specified environmental measures for the Project; however, the CPUC may include new conditions or requirements that are consistent with the Resolution. 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 component as described in Resolution T-17913;
- 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;
- Anticipated equipment over 50 horsepower (e.g., loaders, forklifts, trucks, compressor trailers) required for construction;
- Verification that all relevant pre-construction environmental measures have been or will be completed or implemented (e.g., submittal of biological resource survey reports);

- List of all relevant environmental measures 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);
- 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 PM will review each NTP request in accordance with the steps outlined below:

1. Frontier submits an NTP request;
2. 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;
3. 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;
4. The CPUC PM or 3rd Party PM submits any questions and comments, including requests for required additional information or clarification, to Frontier via email;
5. As needed, Frontier 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;
6. The CPUC PM and/or 3rd Party PM update the Project Implementation Tracker/Compliance Matrix 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;
7. The CPUC PM prepares the draft NTP Authorization Letter, which documents the scope of work, compliance with all requirements, and lists outstanding conditions; and
8. The CPUC PM reviews and approves the NTP Authorization Letter and sends the approval to Frontier.

3.2 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 Frontier 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.

3.2.1 Organizational Chart

Figure 2 is an organizational chart that illustrates communication between CPUC and Frontier personnel. The CPUC and Frontier 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 Project Proponent field staff (e.g., project manager and construction leads/managers) and/or all environmental managers.

3.2.2 Pre-Construction Coordination

Frontier is required by the terms of the environmental measures and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. During this pre-construction process, Frontier may conduct meetings, conference calls, and site visits with the CPUC PM and other agencies and Frontier'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 Frontier's submittals, and document the status of environmental measures as they apply to the Project or phased Project segment (see Section 3.4 for document submittal procedures). The goal of the pre-construction process is to complete all required actions so the CPUC can issue NTP authorizations.

3.2.3 Communication Protocol during Construction

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

3.2.3.1 Progress Meetings 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 Frontier PM, and representatives from Frontier who are knowledgeable about Project engineering and schedule.

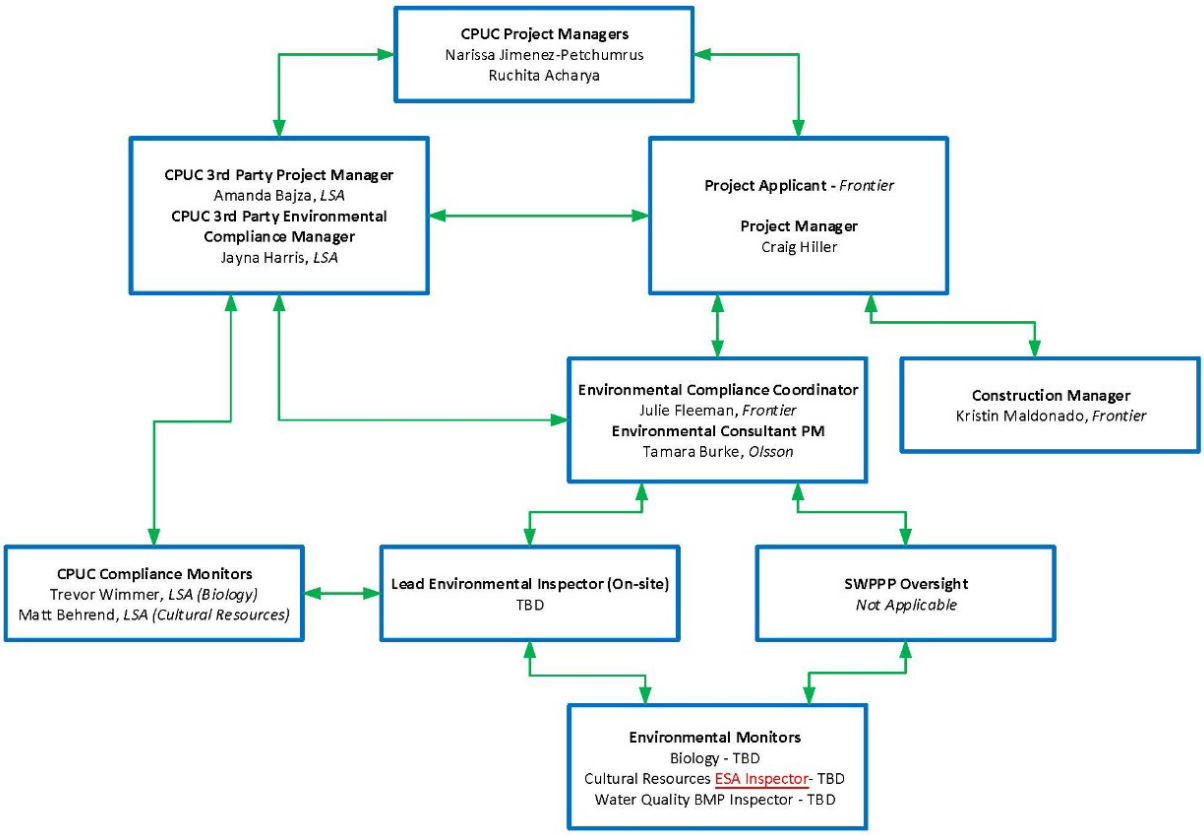


Figure 2: Organization Chart

Frontier will invite CPUC representatives (as identified by CPUC) to the weekly monitoring management meeting, or through additional meetings to be established with Frontier and the CPUC. All authorities having jurisdiction and relevant tribes 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, status of upcoming compliance submittals, any anticipated minor Project changes, and any relevant compliance patterns and trends.

3.2.3.2 Field Staff Communication During Construction

Regular communication among the CPUC PM, Frontier, 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 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 of this CMCRP will be updated accordingly.

The CPUC primary point of contact in the field is the Frontier LEI. The CPUC will contact the Frontier LEI if an activity is observed that conflicts with one or more of the environmental measures, or Project plans. The CPUC will also contact the Frontier LEI regarding construction crew work locations; status of environmental measures, and Project plans; 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 Frontier CM, 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 Frontier LEI. The CPUC will not provide work direction to the contractor or Frontier's environmental monitors and will avoid directing questions to the construction crews.

3.2.3.3 Questions and Clarifications

Questions and the need to clarify Project requirements will periodically arise throughout the implementation process. Both Frontier 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 monitoring reports should be used to document resolutions.

3.2.3.4 Construction Schedule

Frontier 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, Frontier shall inform the CPUC of any schedule changes that may affect implementation of the CMCRP. Frontier will provide a general schedule once construction timelines have been determined.

3.2.3.5 Inclement Weather

In the event of inclement weather or other events that might compromise the health and safety of workers or the general public, Frontier will proactively suspend work until conditions are safe. Frontier will also adhere to any stop-work permit conditions contained in its Caltrans encroachment permit related to weather and safety. Such conditions may require temporary suspension of construction due to heavy rain, snow, fog, wind, wildfire, or other factors that might make working in the Caltrans ROW unsafe. Frontier will remain in close communication with Caltrans when work conditions in the ROW are fluctuating due to inclement weather or other stochastic events.

3.2.3.6 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 environmental monitors and the Frontier environmental compliance team. Questions

then may be raised to the Frontier ECPM, PM, or CM, and the CPUC 3rd Party PM, ECM or the CPUC 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 Frontier, then the CPUC PM will direct the party in question to Frontier;

- **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 a dispute or complaint regarding the implementation or evaluation of environmental measures cannot be resolved informally or through enforcement or compliance action by the CPUC PM, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC executive director or their designee. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the executive director or designee(s) shall meet or confer with the filer and other affected participants for the purposes of resolving the dispute. The executive director shall issue an Executive Resolution describing their decision and serve it on the filer and other affected participants;

- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the resolution, such 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.

3.3 MONITORING AND COMPLIANCE REPORTING DURING CONSTRUCTION

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

3.3.1 CPUC Compliance Monitoring

CPUC 3rd Party Environmental Monitors will use the environmental protection measures identified in the Project Resolution (contained in Appendix A of Resolution T-17913) in the field to confirm Frontier's compliance with these requirements, first on a weekly basis during the initial month of construction and after the first month of construction, the 3rd Party Environmental Monitors will perform field spot checks of Frontier's construction and construction monitoring crews, as necessary. The 3rd Party Environmental Monitors 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.

3.3.2 CPUC Compliance Tracking

The CPUC will track compliance with environmental measure 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.

3.3.3 Frontier Fiber Networks Monitoring and Compliance Reports

3.3.3.1 Weekly Status Report

Frontier will submit a Weekly Status Report by Friday showing the anticipated construction activities for the following week. The Weekly Status Report will include the type of work activity (e.g., vegetation clearing, grading, boring, trenching, pole installation, structure erection), the location of the work activity, and the day(s) work is anticipated to take place.

3.3.3.2 Monthly Environmental Compliance Report

Frontier will prepare and submit a Monthly Environmental Compliance Report to the CPUC by the 15th day of the month (or other CPUC and Frontier mutually agreed upon date) for the previous month's work activities. The Monthly Environmental Compliance Report will include the following:

- **Construction Status:** Provide a summary of current construction status and a summary of construction activities that occurred during the reporting period (identifying project areas where construction activities occurred, type of work performed, and construction methods). Also include a look-ahead work description, and schedule for subsequent work.

- **Schedule:** Include an updated Project schedule. Provide a summary of any changes that have been made to the to schedule since the previous reporting period.

- **Environmental Compliance Matrix:** Provide an updated Environmental Compliance Matrix. Provide a summary of environmental protection measures submitted to the CPUC (or other agencies, as applicable) during the reporting period. Provide a list of any delinquent or outstanding submittals, and a list of any pending CPUC or other agency approvals. Also include a list of any environmental protection measures and/or permit conditions that were added or revised during the reporting period.

- **WEAP:** Provide a summary of how many workers were WEAP trained during the reporting period, how many total workers have been trained to date. Provide WEAP Training Logs/signed training affidavits as an attachment to the monthly report.

- **Worker Health and Safety:** Provide a summary of how many workers received Health and Safety training during the reporting period, how many total workers have been trained to date, and copies of the signed training affidavits as an attachment to the monthly report).

- **Biological Resources:** Include a summary of the biological resources environmental protection measures (and other agency permit conditions, if applicable) implemented during the reporting

period, surveys conducted, survey results, summary of monitoring activities, summary of resources encountered, summary of any noncompliance incidents and their resolutions, and a summary of anticipated activities to be completed during the next reporting period. Include a statement as to whether current monitoring level and frequency is sufficient and any recommended changes. The summary for biological resources may be attached as an attachment to the Monthly Environmental Compliance Report.

- **Cultural Resources:** Include a summary of the cultural resources environmental protection measures (and other agency permit conditions, if applicable) implemented during the reporting period, surveys conducted, survey results, summary of monitoring activities, summary of resources encountered, summary of any noncompliance incidents and their resolutions, and a summary of anticipated activities to be completed during the next reporting period. Include a statement as to whether current monitoring level and frequency is sufficient and any recommended changes. The summary for cultural resources may be attached as an attachment to the Monthly Environmental Compliance Report.

- **Hydrology/Water Quality:** Include a list of the hydrology/water quality protection measures (and other agency permit conditions, if applicable) implemented during the reporting period. Include a summary of erosion and sediment control BMPs implemented during the reporting period, and a summary of any noncompliance incidents and their resolutions.

- **Project Refinements, Project Changes and NTPs:** Provide a summary of any minor Project refinements, Project changes, or NTP requests made during the reporting period and the status of such.

- **Other Regulatory Agencies:** Provide a summary of permits issued by or submittals made to other regulatory agencies.

- **Noncompliance Incidents, Complaints, Notices of Violations, Warnings, and Citations:** Provide a summary of any public complaints, CPUC noncompliance incidents, and other regulatory agency issued notices of violations, official warnings and citations received by the Project during the reporting period and status of resolution. Include Weekly Public Complaint Logs and Noncompliance Incident Reports (as detailed in the following section) as an attachment to the Monthly Environmental Compliance Report.

3.3.4 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 federal, state, and 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 B in this document) would be considered a noncompliance incident.

3.3.4.1 Noncompliance Reporting

If Frontier 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 Frontier. For both self-reports and discoveries, the CPUC PM may request an email or a formal noncompliance incident report (Appendix C) from Frontier, 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 Frontier. Frontier 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 refinements, 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.

3.3.4.2 Incident Response Communication Process

If the issue puts sensitive resources or human health and safety at risk and a stop-work order is warranted, Frontier's LEI will contact the CPUC PM, CPUC 3rd Party PM and ECM and Frontier'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 Frontier 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, Frontier's LEI 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 Frontier'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 Frontier environmental monitors/PMs 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 Compliance Monitors 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 Frontier.

Frontier 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 Frontier 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 Frontier staff concerning the cause and potential resolution of the issue. The CPUC 3rd Party PM will direct Frontier 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 Frontier'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 Frontier. In this case, work will be halted temporarily to discuss a current compliance concern and/or re-align compliance activities as appropriate.

Issues that are not resolved within the length of time agreed upon by Frontier 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. Frontier 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 Frontier to notify the other agency.

3.3.4.3 Construction Halts and Stop-Work Orders

Several scenarios may occur during Project construction for which Frontier's LEI 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 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 Frontier LEI and Frontier CM and/or FCA, 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 Frontier 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, Frontier should address any serious health or safety issues by calling 9-1-1 immediately.

Construction Stand-Down. Either the CPUC PM, or Frontier, 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 Frontier. The purpose of the stand-down would be to give Frontier 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 Frontier 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 Frontier does not require approval by the CPUC to re-start work but must be reported to the CPUC.

3.3.4.4 Public Complaints

Frontier shall provide weekly summaries of public complaints, including how each complaint was addressed, within the Weekly Status Report. The CPUC PM will coordinate with Frontier's PM, who will work with Frontier to determine the adequacy of corrective actions or additional measures to be implemented, as necessary.

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

3.3.5 Minor Project Refinements

This section describes the CPUC process for approving minor Project refinements. Minor Project refinements 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 approved Project Resolution (T-17913). The CPUC PM would evaluate any proposed changes from the approved Project to determine whether they are consistent with approved Resolution T-17913 for the Project. If the CPUC determined the changes to be consistent with Resolution T-17913 for the Project, a requested change would be processed as a minor Project refinement using the Minor Project Refinement Form (Appendix D).

If a Project change is not consistent with Resolution T-17913 for the Project, 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 Project Resolution for Statutory Exemption and/or Conditions of Approval are required.

Requests for CPUC PM approval of a minor Project refinement must be made in writing and include the following:

- 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 minor Project refinements 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 the Project Resolution 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.

3.4 DOCUMENTATION AND SUBMITTAL REQUIREMENTS AND RECORDS MANAGEMENT

3.4.1 Electronic Submittals

All required documentation from Frontier, including plans, permits, reports, and staff qualifications as required by environmental measures, will be maintained by Frontier on a SharePoint site with access to these documents provided to the CPUC. In addition, Frontier 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, Frontier 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 Frontier's SharePoint site.

3.4.2 On-Site Documentation

In addition, copies of the CMCRP and all applicable plans and permits compiled prior to and during construction shall be kept on-site (Frontier's construction trailer), and all supervisory staff working on the Project should be familiar with their contents.

3.4.3 Administrative Record

The CPUC PM will compile all required documentation submitted by Frontier 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.

3.4.4 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 environmental protection measures monitoring related documents will be made available on the Project website: [link to be inserted once available/live].

4.0 REFERENCES

Frontier Communications. 2026. Environmental Resource Memo – Expected Categorical Exemption for the Frontier Fiber Installation Project, Riverside County, CA – North Shore. January 9.

_____. 2026. Data Request #1 Responses. June 8.

Public Utilities Commission of the State of California. 2026. Resolution T-17913. April 30.

APPENDIX A

PROJECT CONTACT LIST

Project Contacts

Name	Position	Email	Phone (Work)	Phone (Mobile)
First/Emergency Contacts:				
Frontier				
Craig Hiller	Project Manager	craig.hiller@verizon.com	828-275-5465	
Julie Fleeman	Compliance/Reporting Manager	julie.fleeman@verizon.com		
Andy King	Frontier Engineer	william.king2@verizon.com	469-978-2890	
Kristin Maldonado	Construction/Engineering Director	kristin.maldonado@verizon.com	951-663-6751	
Olsson				
Tamara Burke	Environmental Consultant Project Manager	tburke@olsson.com	303-327-2072	

Agency Contacts

Name	Title	Office	Email	Phone Number	Role
California Public Utilities Commission					
Narissa Jimenez-Petchumrus	CEQA Project Manager	Energy Division	Narissa.Jimenez-Petchumrus@cpuc.ca.gov	213-266-4726	CPUC Project Manager
Ruchita Acharya	CEQA Project Manager	Energy Division	Ruchita.Acharya@cpuc.ca.gov		CPUC Project Manager
Amanda Bajza	3rd Party Project Manager	LSA	Amanda.Bajza@lsa.net	949-338-7537	CPUC Third-Party Project Manager
Jayna Harris	3rd Party Environmental Compliance Manager	LSA	Jayna.Harris@lsa.net	949-535-1471	CPUC Third-Party Environmental Compliance Manager
Caltrans					
~~Ardo Narvasa~~ Karen Adame	Project Manager	Caltrans District 8	~~ardo.narvasa@dot.ca.gov~~ Karen.Adame@dot.ca.gov	~~909 754 5502~~ 909 383-7516	~~Oversight Resident Engineer~~ Permit Issuer
California Department of Fish and Wildlife					
Jacob Skaggs	Senior Environmental Scientist Specialist	Ontario Office	Jacob.Skaggs@Wildlife.ca.gov	760-218-0320	CDFW contact during consultation / CESA Species oversight
Regional Water Quality Control Board					
	~~Colorado River Basin Regional Water Quality Control Board (Region 7)~~	~~Palm Desert Office~~		~~760-346-7491~~	

Agency Contacts

Name	Title	Office	Email	Phone Number	Role
Logan Raub	Senior Environmental Scientist	Region 7	Logan.Raub@waterboards.ca.gov	(760) 776-8966	401 Oversight
Bureau of Land Management					
	BLM	Palm Springs-South Coast Field Office		760-833-7100	
U.S. Bureau of Reclamation/ California Department of Parks and Recreation					
	California Department of Parks and Recreation (CDPR), Salton Sea State Recreation Area	Salton Sea State Recreation Area		760-393-3052	
U.S. Fish and Wildlife Service					
Lory Salazar-Velasquez	Fish and Wildlife Biologist	Colorado Desert Division, Palm Springs Office	lory_salazar-velasquez@fws.gov	760-257-8158	USFWS contact during consultation / Federally listed species oversight
Bureau of Indian Affairs / Tribes					
~~H. Jill McCormick, M.A.~~	~~Historic Preservation Office, Ft. Yuma Quechan Indian Tribe~~	~~Yuma, AZ~~	~~historicpreservation@quechantribe.com~~	~~760-919-3631~~	~~Ft. Yuma Quechan Indian Tribe Representative~~
~~Eunice Ambriz-Aguilar~~	~~San Manuel Band of Mission Indians Representative~~		~~Eunice.Ambriz@sanmanuel-nsn.gov~~		~~San Manuel Band of Mission Indians Representative~~
~~Cheryl Madrigal~~	~~Rincon Band of Luiseño Indians Cultural Resources Manager, Tribal Historic Preservation Officer, Cultural Resources Department,~~	~~Valley Center~~	~~mailto:cmadrigal@rincon-nsn.gov~~	~~760-749-1092~~	~~Rincon Band of Luiseño Indians Representative~~
Agua Caliente Band of Cahuilla Indians	Lacy Padilla, Director of Historic Preservation/THPO		ACBCI-THPO@aguacaliente.net	(760) 333-5222	Tribal Contact
Augustine Band of Cahuilla Indians	Tribal Operations,		info@augustinetribe-nsn.gov	(760) 398-4722	Tribal Contact

Agency Contacts

Name	Title	Office	Email	Phone Number	Role
Cabazon Band of Cahuilla Indians	Doug Welmas, Chairperson		jstapp@cabazonindians-nsn.gov	(760) 342-2593	Tribal Contact
Cahuilla Band of Indians	Anthony Madrigal, Tribal Historic Preservation Officer		anthonymad2002@gmail.com	(951) 763-5549	Tribal Contact
Cahuilla Band of Indians	BobbyRay Esparza, Cultural Director		besparza@cahuilla-nsn.gov	(951) 763-5549	Tribal Contact
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Chemehuevi Indian Tribe	Kaitlyn Snodgrass, Cultural Director		cultural@cit-nsn.gov	(760) 858-4219	Tribal Contact
Chemehuevi Indian Tribe	Glenn Lodge, Chairman		chairman@cit-nsn.gov	(760) 858-4219	Tribal Contact
Colorado River Indian Tribes	Rebecca Loudbear, Attorney General		rloudbear@critdoj.com	(928) 669-1271	Tribal Contact
Fort Mojave Indian Tribe	Timothy Williams, Chairperson		lindaotero@fortmojave.com	(760) 629-4591	Tribal Contact
Gabrieleno Band of Mission Indians - Kizh Nation	Andrew Salas, Chairperson		admin@gabrielenoindians.org	(844) 390-0787	Tribal Contact
Gabrieleno Band of Mission Indians - Kizh Nation	Christina Swindall Martinez, Secretary		admin@gabrielenoindians.org	(844) 390-0787	Tribal Contact
Gabrieleno/Tongva San Gabriel Band of Mission Indians	Anthony Morales, Chairperson		GTTribalcouncil@aol.com	(626) 483-3564	Tribal Contact
Gabrielino Tongva Indians of California Tribal Council	Robert Dorame, Chairperson		gtongva@gmail.com	(562) 761-6417	Tribal Contact

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Gabrielino/Tongva Nation	Sandonne Goad, Chairperson		sgoad@gabrielino-tongva.com	(951) 807-0479	Tribal Contact
Gabrielino/Tongva Nation	Sam Dunlap, Cultural Resource Director		tongvatcr@gmail.com	(909) 262-9351	Tribal Contact
Gabrielino/Tongva Nation	Charles Alvarez, Chairperson		Chavez1956metro@gmail.com <Chavez1956metro@gmail.com>	(310) 403-6048	Tribal Contact
Juaneno Band of Mission Indians	Sonia Johnston, Chairperson		sonia.johnston@sbcglobal.net		Tribal Contact
Juaneno Band of Mission Indians Acjachemen Nation - Belardes	Joyce Perry, Cultural Resource Director		kaamalam@gmail.com	(949) 293-8522	Tribal Contact
Juaneno Band of Mission Indians Acjachemen Nation 84A	Heidi Lucero, THPO/MLD		thpo@jbmian.com	(562) 879-2884	Tribal Contact
Juaneno Band of Mission Indians Acjachemen Nation 84A	Nathan Banda, Chairman		nbanda@jbmian.com	(949) 426-8804	Tribal Contact
Juaneno Band of Mission Indians Acjachemen Nation 84A	Shannon Wingfield, Secretary		webmaster@jbmian.com	(949) 488-3484	Tribal Contact
La Jolla Band of Luiseno Indians	Norma Contreras, Chairperson			(760) 742-3771	Tribal Contact
Los Coyotes Band of Cahuilla and Cupeño Indians	Ray Chapparosa, Chairperson			(760) 782-0711	Tribal Contact
Morongo Band of Mission Indians	Robert Martin, Chairperson		abrierty@morongo-nsn.gov	(951) 755-5110	Tribal Contact

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Name	Title	Office	Email	Phone Number	Role
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Pala Band of Mission Indians	Christopher Nejo, Legal Analyst/Researcher		cnejo@palatribe.com	(760) 891-3564	Tribal Contact
Pala Band of Mission Indians	Shasta Gaughen, Tribal Historic Preservation Officer		sgaughen@palatribe.com	(760) 891-3515	Tribal Contact
Pala Band of Mission Indians	Alexis Wallick, Assistant THPO		awallick@palatribe.com	(760) 891-3537	Tribal Contact
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Pechanga Band of Indians	Steve Bodmer, General Counsel for Pechanga Band of Indians		sbodmer@pechanga-nsn.gov	(951) 770-6171	Tribal Contact
Pechanga Band of Indians	Tuba Ebru Ozdil, Pechanga Cultural Analyst		eozdil@pechanga-nsn.gov	(951) 770-6313	Tribal Contact
Quechan Indian Tribe of the Fort Yuma Reservation	Jordan Joaquin, President, Quechan Tribal Council		executivesecretary@quechantribe.com	(760) 919-3600	Tribal Contact
Quechan Indian Tribe of the Fort Yuma Reservation	Jill McCormick, Historic Preservation Officer		historicpreservation@quechantribe.com	(928) 261-0254	Tribal Contact
Ramona Band of Cahuilla	Joseph Hamilton, Chairperson		admin@ramona-nsn.gov	(951) 763-4105	Tribal Contact
Rincon Band of Luiseno Indians	Joseph Linton, Tribal Council/Culture Committee Member		jlinton@rincon-nsn.gov	(760) 803-3548	Tribal Contact
Rincon Band of Luiseno Indians	Laurie Gonzalez, Tribal Council/Culture Committee Member		lgonzalez@rincon-nsn.gov	(760) 484-4835	Tribal Contact
Rincon Band of Luiseno Indians	Cheryl Madrigal, Cultural Resources		cmadrigal@rincon-nsn.gov	(760) 648-3000	Tribal Contact

Agency Contacts

Name	Title	Office	Email	Phone Number	Role
	Manager/Tribal Historic Preservation Officer				
Rincon Band of Luiseno Indians	Denise Turner Walsh, Attorney General		dwalsh@rincon-nsn.gov	(760) 689-5727	Tribal Contact
San Luis Rey Band of Mission Indians	Carmen Mojado, Secretary of Goverment Affairs		cjmojado@slrmissionindians.org	(760) 917-1736	Tribal Contact
San Manuel Band of Mission Indians	Alexandra McCleary, Senior Manager of Cultural Resources Management		alexandra.mccleary@sanmanuel-nsn.gov	(909) 633-0054	Tribal Contact
Santa Rosa Band of Cahuilla Indians	Steven Estrada, Tribal Chairman		sestrada@santarosa-nsn.gov	(951) 659-2700	Tribal Contact
Santa Rosa Band of Cahuilla Indians	Vanessa Minott, Tribal Administrator		vminott@santarosa-nsn.gov	(951) 659-2700	Tribal Contact
Serrano Nation of Mission Indians	Mark Cochrane, Co-Chairperson		serranonation1@gmail.com	(909) 578-2598	Tribal Contact
Serrano Nation of Mission Indians	Wayne Walker, Co-Chairperson		serranonation1@gmail.com	(253) 370-0167	Tribal Contact
Soboba Band of Luiseno Indians	Jessica Valdez, Cultural Resource Specialist		jvaldez@soboba-nsn.gov	(951) 663-6261	Tribal Contact
Soboba Band of Luiseno Indians	Joseph Ontiveros, Tribal Historic Preservation Officer		jontiveros@soboba-nsn.gov	(951) 663-5279	Tribal Contact
Torres-Martinez Desert Cahuilla Indians	Thomas Tortez, Chairperson		thomas.tortez@tmdci.org	(760) 397-0300	Tribal Contact
Torres-Martinez Desert Cahuilla Indians	Gary Resvaloso, TM MLD		grestmtm@gmail.com	(760) 777-0365	Tribal Contact
Torres-Martinez Desert Cahuilla Indians	Abraham Becerra, Cultural Coordinator		abecerra@tmdci.org	(760) 397-0300	Tribal Contact

Agency Contacts

Name	Title	Office	Email	Phone Number	Role
Torres-Martinez Desert Cahuilla Indians	Mary Belardo, Cultural Committee Vice Chair		belardom@gmail.com	(760) 397-0300	Tribal Contact
Torres-Martinez Desert Cahuilla Indians	Alesia Reed, Cultural Committee Chairwoman		lisareed990@gmail.com	(760) 397-0300	Tribal Contact
Twenty-Nine Palms Band of Mission Indians	Christopher Nicosia, Cultural Resources Manager/THPO Manager		christopher.nicosia@29palmsbomi-nsn.gov	(760) 863-3972	Tribal Contact
Twenty-Nine Palms Band of Mission Indians	Nicolas Garza, Cultural Resources Specialist		nicolas.garza@29palmsbomi-nsn.gov	(760) 863-2486	Tribal Contact
Twenty-Nine Palms Band of Mission Indians	Sarah O'Brien, Tribal Archivist		sobrien@29palmsbomi-nsn.gov	(760) 863-2460	Tribal Contact
Riverside County					
Dennis Acuna	~~Encroachment Permit~~ Director of Transportation	~~Riverside~~ Transportation Department Desert-Permits East	encroachmentpermits@rivco.org	951-955-6790	For Jesse Mendoza – Technical Engineering Unit Supervisor
Imperial Irrigation District					
Claudia M. Duarte	IID Representative/ Business Development Support staff		jointuse@IID.com	760-339-9761	Pole Attachment

APPENDIX B

SITE INSPECTION FORM

FRONTIER RIVERSIDE 1 PROJECT
CPUC SITE INSPECTION FORM

Project:	Frontier Riverside 1 Project	Date	
Project Proponent:	Frontier	Report #:	
Lead Agency:	CPUC	Monitor(s):	
CPUC PM:		AM/PM Weather	
Project (NTP(s)):			

SITE INSPECTION CHECKLIST	Yes	No	N/A
WEAP Training			
Has WEAP training been completed by all new hires (construction and monitors)?			
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?			
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?			
Are all excavations and trenches covered at the end of the day?			
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?			
Biological Resources			
Have pre-construction surveys been completed for biological resources as appropriate?			
Are biological monitors present on-site?			
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?			
Have wildlife been relocated from work areas?			
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?			
Were any threatened or endangered species observed? If yes, list observations below:			
Are there wetlands or water bodies present near construction activities?			
Have there been any work stoppages for biological resources?			
Cultural Resources			
Are identified cultural resources that will not be relocated/salvaged clearly marked for exclusion?			
Are archaeological monitors on-site if needed?			
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites, ESAs)?			
Erosion and Dust Control (Water Quality/Hydrology)			
Have temporary erosion and sediment control measures been installed?			
Are erosion and sediment control measures properly installed and functioning?			
Work Hours			
Is construction occurring within approved hours?			

PROJECT FACILITIES AND FEATURES MONITORED:

FRONTIER RIVERSIDE 1 PROJECT
CPUC SITE INSPECTION FORM

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., environmental measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews):
ENVIRONMENTAL MEASURES VERIFIED (Refer to CMCRP, e.g., EM BIO-5. Report only on EMs pertinent to your observations today):
RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve):
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on- site, environmental observations of note):
COMPLIANCE SUMMARY: Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs. New biological or cultural discovery requiring compliance with environmental measures, permit conditions, etc. Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted. ☐ New noncompliance issues reported by Frontier monitors since your last visit. Describe issues and resolution under "compliance
PREVIOUS NONCOMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

FRONTIER RIVERSIDE 1 PROJECT
CPUC SITE INSPECTION FORM

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	**Location**	**Photo**	**Description**

Completed by:	
Firm:	
Date:	

Reviewed by:	
Firm:	
Date:	

APPENDIX C

NONCOMPLIANCE REPORT FORM

FRONTIER 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:
Recommended Timeline for Follow-Up:

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

Prepared by: _____ Date: _____

FRONTIER RIVERSIDE 1 PROJECT
CONSTRUCTION NONCOMPLIANCE REPORT

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

Project Name CPUC Minor Project Refinement Form

Minor project refinements *are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact, create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.*

Date Requested: Month XX, XXXX

Report No.: X

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): X

Location/Milepost: X

Land Use/Vegetative Cover: X

Sensitive Resources: **X**

Modification From: ☐ **Permit** ☐ **Plan/Procedure** ☐ **Specification** ☐ **Drawing** ☐ **Mitigation Measure** ☐ **Other:**

Proposed Action(s):

Describe how project refinement deviates from current project. Include photos:

Original Condition:

Justification for Change:

Maps & Figures:

Environmental Impact:

Concurrence (if appropriate):

Resources:

Biological	☐ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources

Previous Biological Survey Report Reference:

Cultural	☐ No Resources Present	☐ Resources Present	☐ N/A, changes would not affect resources

Previous Cultural Survey Report Reference:

Paleontological	☐ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources

Previous Paleontological Survey Report Reference:

Disturbance Acreage Changes: ☐ Yes ☐ No

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the Final IS/MND as it relates to MPR-X. MPR-X would have no potential to impact the following environmental resource areas and therefore are not included in the table below: Aesthetics, Agriculture and Forestry Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Recreation.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Air Quality	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Biological Resources	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Cultural and Tribal Cultural Resources	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Geology and Soils	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Greenhouse Gas Emissions	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Hazards and	☐ Y	

Hazardous Materials	☐ N
Agency Consultation?	☐ Y
	☐ N
Hydrology and Water Quality	☐ Y
	☐ N
Agency Consultation?	☐ Y
	☐ N
Noise and Vibration	☐ Y
	☐ N
Agency Consultation?	☐ Y
	☐ N
Transportation	☐ Y
	☐ N
Agency Consultation?	☐ Y
	☐ N
Utilities and Service Systems	☐ Y
	☐ N
Agency Consultation?	☐ Y
	☐ N
Wildfire	☐ Y
	☐ N
Agency Consultation?	☐ Y
	☐ N