Appendix B

Mitigation Monitoring and Reporting Program

Introduction

Public Resources Code Section §21081.6(a)(1) and the California Environmental Quality Act (CEQA) Guidelines Section 15097 require public or lead agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

A public or lead agency adopting measures to mitigate or avoid the significant impacts of a proposed project is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). The mitigation measures required by a public or lead agency to reduce or avoid significant project impacts may be incorporated into the design or program for the project, or made conditions of project approval as set forth in a Mitigation Monitoring and Reporting Program (MMRP). The program must be designed to ensure project compliance with mitigation measures during project implementation.

The following is the MMRP for the State Water Resources Control Board (State Water Board) Statewide Utility Wildfire General Order (General Order). The MMRP includes the mitigation measures identified in the Environmental Impact Report (EIR) that are required to address the significant impacts associated with the General Order.

Projects authorized under the General Order must comply with applicable General Order requirements and mitigation measures listed in the impact section for each resource area. The applicability of General Order requirements, and mitigation measures depend on the project activities, project location, and the potentially significant impacts of the individual project.

The required mitigation measures are summarized in Table 1-1; the full text of the impact analysis and mitigation measures are presented in Chapter 3 of the EIR.

Format of the MMRP

The MMRP is organized in a table format (Table 1-1) by resource. The column headings in the table are defined as follows:

- **Resource:** This column identifies the impacted resource.
- **Mitigation Measures:** This column identifies the mitigation measures associated with the impacts identified in the EIR.
- **Monitoring Responsibility:** This column provides a reporting area for assignment of responsibility of each monitoring and reporting task (for future individual projects).
- **Monitoring Compliance Record (Name/Day):** This column provides a reporting area for identifying who completed the mitigation measure and/or monitoring compliance and the date of completion (for future individual projects).

Table 1 - Summary of Mitigation Measures

Resource(s)	Mitigation Measures	Monitoring Responsibility	Monitoring Compliance Record (Name/Date)
Aesthetics	**Mitigation Measure AES-01: Reduction of Visibility of New Structures in Sensitive Landscapes** The Utility Service would design new structures (e.g., interest poles, additional hardware and equipment being added to existing poles, supporting structures and stub poles, access roads etc.) to minimize the impact on the existing visual character and quality associated in sensitive landscapes (e.g., in, along, or near national, state, or local parks, recreation areas, forest, scenic routes, vista views, or similar). To the extent feasible and consistent with safety of visible guardrails, substations and switching stations, infrastructure would be composed of a non-reflective material to help blend the surfaces in with the surroundings. Utility Services would prioritize constructing access roads in locations not visible to the public.		
Biological	**Mitigation Measure BIO-1: Agency Consultation, Permitting, and Mitigation** If sensitive biological resources occur or have potential to occur in the Project Area, the Utility Service would be required to consult with the applicable regulating agency or agencies to acquire permits, implement mitigation, and coordinate to avoid conflict with existing Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans. The regulatory agencies would likely require protocol surveys to qualify and quantify the extent of the sensitive biological resources in the Project Area. To the extent such resources are found, a qualified biologist construction monitor may be necessary. Permit measures intended to avoid to minimize impacts could also include the requirement to develop and implement avoidance plans to protect fish and wildlife. Where nesting birds, migratory birds, or bat roosts may be affected by Project Activities, especially vegetation management, regulatory agencies may impose requirements to avoid and reduce potential impacts such as buffers, work windows,		

Resource(s)	Mitigation Measures	Monitoring Responsibility	Monitoring Compliance Record (Name/Date)
Biological (cont.)	or other project-specific requirements. When Project Activities must be conducted within or adjacent to watercourses that have the potential to support anadromous salmonids, regulatory agencies may require specific work windows or other project specific requirements to avoid or minimize impacts to aquatic resources. Additionally, ~~P~~permit conditions would likely require Utility Services to install resource-specific buffers ~~in the Project Area~~ prior to ground disturbance to reduce impacts to sensitive biological resources in the Project Area. Applicable conditions may also address the potential spread of diseases and invasive aquatics and plant species that can be prevented by decontamination of equipment. Permit conditions may also avoid or minimize impacts to rare plant species and impacts to forest habitat elements. Mitigation for Utility Services' impact to sensitive biological resources could include purchasing mitigation bank credits and/or enhancing or preserving existing populations or habitat in perpetuity. Utility Services would be required to acquire a habitat conservation plan and incidental take permit under federal ESA Section 10(a) or a federal interagency consultation for an incidental take permit under ESA Section 7 from USFWS for impacts to federally listed species. Utility Services would be required to acquire an incidental take permit pursuant to Fish and Game Code 2081 from CDFW for impacts to state listed species. ~~Utility Service impacts to waters of the US could require a CWA Section 404 permit from the US Army Corps and a Section 401 WQC from the State or Regional Water Board. Project Activity impacts to aquatic resources that are only under state jurisdiction could require Utility Services to acquire waste discharge requirements (WDR) from the State or Regional Water Board~~. Project Activity impacts to streambeds and lakes could require Utility Services acquire a Lake and Streambed Alteration Agreement from CDFW. Utility Services could be required to acquire a Coastal Development Permit from the CCC or local government managing the Local Coastal Program for Project Activities in the		

Resource(s)	Mitigation Measures	Monitoring Responsibility	Monitoring Compliance Record (Name/Date)
Biological (cont.)	coastal zone. Project Activities in the Bay Area could require Utility Services acquire permits from the San Francisco Bay Conservation and Development Commission. Utility Services would be subject to applicable local agency regulations.		
Geology and Soils	**Mitigation Measure GEO-1 Adherence to Utility Earthwork Standards** Utility Services would conduct Project Activities in compliance with all applicable utility and earthwork regulatory standards, including those required by the California Public Utilities Commission, Institute of Electrical and Electronics Engineers 693 standards, California Building Code, and other existing federal, state, and local laws, regulations, and/or standards.		
	Mitigation Measure GEO-2: Conduct General Project-Level Analysis for Paleontological Sensitive Units Prior to breaking ground, Utility Services would be required to assess whether the proposed project occurs on a paleontologically sensitive map unit. If the proposed project occurs on a paleontologically sensitive map unit and the scope of work includes ground disturbance at a depth and/or width that would reasonably be expected to impact paleontological resources, a qualified paleontologist would develop a paleontological resource monitoring and recovery plan. A qualified paleontologist is one who possesses advanced training and education in a field of study that is relevant to paleontological assessment. A paleontological sensitive map unit will be determined using the Bureau of Land Management (BLM) Potential Fossil Yield Classification System or another similar paleontological sensitivity scale recognized by the paleontological community such as the Society of Vertebrate paleontology (SVP 2010). A unit will be considered a paleontological sensitive map unit if it is classified as moderate or higher according to the BLM Potential Fossil		

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Geology and Soils (cont.)	Yield Classification System. The development and implementation of a general paleontological impact mitigation plan that covers all potential applicable activities and identification of paleontological sensitive map units within the service area will satisfy this requirement. The paleontological resource monitoring and recovery plan would detail monitoring protocols for ground disturbance proposed in sediment with a moderate to high paleontological sensitivity. The monitoring and recovery plan would be designed and led by a qualified paleontologist to ~~determine the extent of fossiliferous sediment being exposed and affected by erosion, and~~ determine whether paleontological resources are being lost. If the loss of scientifically significant paleontological resources is documented, then the recovery program would be implemented.		
	Mitigation Measure GEO-3: Conduct Paleontological Training to Construction Crews If after implementing mitigation measure GEO-2, the proposed project was determined to occur in a location with moderate to high paleontological sensitivity and the scope of work includes ground disturbance at a depth and/or width that would reasonably be expected to impact paleontological resources, a qualified paleontologist shall prepare paleontological resources sensitivity training materials prior to ground disturbance for use during project worker environmental training. This training shall be conducted by an environmental professional under the supervision of a qualified paleontologist. Prior to ground disturbance, all construction personnel onsite will receive paleontological resources sensitivity training, even if they arrive after initial ground disturbance begins. The paleontological resource sensitivity training shall report the types of resources that could be encountered within the		

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Geology and Soils (cont.)	project site and the procedures to follow if they are found; if paleontological resources are detected, all work within at least 100 feet should be halted until a qualified paleontological resources specialist evaluates the item for its significance and records the item. Project proponents and/or project contractors shall retain documentation demonstrating that all construction personnel attended the paleontological resource sensitivity training before the start of work on the site and shall provide documentation to the project manager upon request.		
Hazards and Hazardous Materials	**Mitigation Measure HAZ-1: Compliance with Applicable Laws, Regulations, and Ordinances** Utility Services would be required to comply with applicable state, federal, and local laws, regulations, and requirements pertaining to hazardous materials and hazardous wastes. Relevant regulations include the Toxic Substances Control Act, CWA, Solid Waste Disposal Act, Resource Conservation and Recovery Act, and the Comprehensive Environmental Response, Compensation, and Liability Act. In addition, Utility Services storing hazardous materials that meet or exceed the state thresholds (i.e., 55 gallons for liquids, 500 pounds for solids, and 200 cubic feet for gasses) are ~~required to prepare a Hazardous Materials Management Plan;~~ shall prepare and submit a Hazardous Materials Business Plan if required by CA Health and Safety Code Chapter 6.95; the plan would detail BMPs to minimize the effects to incidental releases, and ensure proper handling, storage, and disposal of hazardous and nonhazardous waste. These regulations establish legal requirements for hazardous materials storage, transportation and handling, and agency oversight.		

Resource(s)	Mitigation Measures	Monitoring Responsibility	Monitoring Compliance Record (Name/Date)
Noise	**Mitigation Measure NOI-01: Adherence to Noise Standards and Policies per the Applicable General Plan, Noise Ordinances, or Other Agency Regulations** Noise-generating Project Activities would follow the applicable general plan, noise ordinances, and other agency or agencies regulations for the jurisdiction located within the vicinity of the project.		