

## APPENDIX C – MITIGATION MONITORING PROGRAM

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1 The State Lands Commission (CSLC) is the lead agency under the California  
2 Environmental Quality Act (CEQA) for the San Francisco Bay Fiber Optic Cables  
3 Project (Project). In conjunction with approval of this Project, the CSLC adopts  
4 this Mitigation Monitoring Program (MMP) for implementing mitigation measures  
5 (MMs) for the Project to comply with Public Resources Code § 21081.6,  
6 subdivision (a) and State CEQA Guidelines §§ 15074, subdivision (d), and 15097.

7 The Project authorizes Bandwidth ~~IG Infrastructure Group~~, LLC (Applicant or  
8 Bandwidth) to build infrastructure in terrestrial and marine areas connecting  
9 Brisbane (San Mateo County) to San Leandro (Alameda County) in California.

### 10 1.1 PURPOSE

11 ~~It is important that~~ Potentially significant environmental impacts from the Project  
12 ~~are~~ must be mitigated to the maximum extent feasible. The purpose of an MMP  
13 is to confirm compliance with and implementation of MMs; this MMP will be used  
14 as a working guide for implementation, monitoring, and reporting for the  
15 Project's MMs.

### 16 1.2 ENFORCEMENT AND COMPLIANCE

17 The CSLC is responsible for enforcing the MMP. The Project Applicant is  
18 responsible for successfully implementing and complying with the MMs identified  
19 in this MMP. This includes all field personnel working for the Applicant.

### 20 1.3 MONITORING

21 CSLC staff may delegate duties and responsibilities for monitoring to other  
22 environmental monitors or consultants as necessary. Some monitoring  
23 responsibilities may be assumed by other agencies, such as affected jurisdictions  
24 (San Mateo County and Alameda County). The CSLC or its designee shall  
25 ensure that qualified environmental monitors are assigned to the Project.

26 **Environmental Monitors.** An environmental monitor must be on-site during all  
27 Project activities with the potential to create significant environmental impacts  
28 or impacts for which mitigation is required to confirm implementation and  
29 success of MMs.

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- 1 Along with CSLC staff, the environmental monitor(s) are responsible for:
- 2 • Confirming the Applicant has completed all necessary agency reviews
  - 3 and received all necessary approvals to perform the Project
  - 4 • Coordinating with the Applicant to integrate the MM procedures during
  - 5 Project implementation
  - 6 • Confirming that the MMP is followed

7 If the Applicant or their contractors requested changes from the procedures in  
8 this MMP, the environmental monitor ~~would~~ will immediately relay those  
9 requests ~~any changes from the procedures in this MMP~~ to CSLC staff or its  
10 designee and ~~would~~ will not ~~apply~~ allow the requested changes until CSLC staff  
11 or its designee approve ~~any change and its correction~~ them.

12 **Workforce Personnel.** Implementing the MMP requires the full cooperation of  
13 Project personnel and supervisors. Many of the MMs require action from site  
14 supervisors and their crews. To facilitate successful implementation, relevant  
15 mitigation procedures shall be written into contracts between the Applicant  
16 and any contractors.

17 **General Reporting Procedures.** ~~A monitoring record form would be submitted to~~  
18 ~~the Applicant, and once the Project is complete, copies of all the logs would be~~  
19 ~~submitted to CSLC staff. CSLC staff or its designated environmental monitor~~  
20 ~~would~~ will develop a checklist monitoring process to track all procedures  
21 required for each MM and ~~would~~ will confirm that the timing specified for the  
22 procedures is followed. The environmental monitor shall note any issues  
23 noncompliance or discrepancies ~~that may occur~~ and take appropriate action  
24 to resolve them. Once the Project is complete, copies of all logs will be  
25 submitted to CSLC staff.

26 **Public Access to Roads Records.** Records and reports are ~~open to the~~ public  
27 and will be provided upon request.

### 28 **1.4 MITIGATION MONITORING PLAN**

29 The MMP contains ~~Mitigation measures~~ MMs for reducing or avoiding potentially  
30 significant impacts to Air Quality; Biological Resources; Cultural Resources;  
31 Cultural Resources – Tribal; Greenhouse Gas Emissions; Hazards and Hazardous  
32 Materials; Hydrology and Water Quality; Noise; Recreation; Transportation; and  
33 Commercial and Recreational Fishing. Project activities ~~All other environmental~~

1 factors were found to have less than significant or no impacts to all other  
2 environmental resource areas; therefore, they are not included. The MMP  
3 includes the following information:

- 4 • **Potential Impact:** Impacts of the Project on the resource
- 5 • **Mitigation Measure:** Full MM(s) text
- 6 • **Monitoring/Reporting Action:** Action to be taken by the environmental  
7 monitor or Lead Agency
- 8 • **Effectiveness Criteria:** How the agency can know if the MM is effective
- 9 • **Responsible Party:** Entity responsible to comply with the MM
- 10 • **Timing:** Before, during, or after terrestrial or marine Project ~~areas~~  
11 construction; during Project operation; etc.

#### 12 1.4.1 AIR QUALITY

##### 13 **Potential Impact: Air Quality – Impacts ~~on~~ from construction emissions**

14 **MM AIR-1: Use of Tier 4 Equipment.** All off-road diesel-powered heavy  
15 equipment used to construct the Project shall be equipped with Tier 4 engines,  
16 except for specialized equipment or when Tier 4 engines are not available.  
17 Retrofits that achieve or exceed emission reductions equivalent to that of a  
18 Tier 4 engine may be used in lieu of Tier 4 engines.

##### 19 **Potential Impact: Air Quality – Impacts from construction emissions**

20 **MM AIR-2: Standard Control Measures for Construction Equipment.** The following  
21 air quality control measures shall be implemented during terrestrial construction.

- 22 • Maintain all construction equipment in proper tune according to  
23 manufacturer's specifications.
- 24 • Fuel all off-road and portable diesel-powered equipment with CARB-  
25 certified motor vehicle diesel fuel (non-taxed version suitable for use  
26 off-road).
- 27 • All on- and off-road diesel equipment shall not idle for more than  
28 5 minutes continuously.
- 29 • Signs shall be posted in the designated queuing areas and job sites to  
30 remind drivers and operators of the 5-minute idling limit.
- 31 • Diesel idling within 1,000 feet of sensitive receptors is not permitted.

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- 1 • Staging and queuing areas shall not be located within 1,000 feet of  
2 sensitive receptors.
- 3 • Electrify equipment when feasible.
- 4 • Substitute gasoline-powered in place of diesel-powered equipment,  
5 where feasible.
- 6 • Use alternatively fueled construction equipment on-site where feasible,  
7 such as compressed natural gas (CNG), liquefied natural gas (LNG),  
8 propane, or biodiesel.

9 **Location:** Terrestrial Project areas

10 **Monitoring/Reporting Action:** Contract specifications

11 **Effectiveness Criteria:** Reducing construction-related emissions released

12 **Responsible Party:** Applicant

13 **Timing:** During construction

14 <b>Potential Impact: Air Quality – Impacts on localized dust levels</b>
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15 **MM AIR-3: Minimize Fugitive Dust.** Minimize fugitive dust during construction by  
16 implementing the following measures:

- 17 • Reduce the amount of disturbed area where possible.
- 18 • Use water trucks / construction trailers or sprinkler systems in dry weather in  
19 sufficient quantity to prevent airborne dust from leaving the site.
- 20 • Implement dust control measures as soon as possible following completion  
21 of any soil-disturbing activities.
- 22 • Establish a policy that vehicle speed for all construction vehicles is not to  
23 exceed 15 miles per hour (24 kilometers per hour) on any unpaved  
24 surface.
- 25 • Water all active construction areas (including storage piles) as needed to  
26 suppress dust. Base the frequency on the type of operation and the soil  
27 and wind exposure.
- 28 • Cover or maintain at least 2 feet (0.6 meter) of space between the  
29 material and the top of the container on haul trucks transporting soil,  
30 sand, or other loose material on and off the site.
- 31 • Sweep adjacent public roads if visible soil material is carried out from a  
32 work site.

- 1 **Location:** Terrestrial Project areas
- 2 **Monitoring/Reporting Action:** Contract specifications
- 3 **Effectiveness Criteria:** Reducing increases in localized dust levels
- 4 **Responsible Party:** Applicant and Contractors
- 5 **Timing:** During terrestrial Project ~~areas~~ construction

#### 6 **1.4.2 BIOLOGICAL RESOURCES**

7 <b>Potential Impact: Biological Resources – Impacts on special-status species and</b>
8 <b>habitats</b>

9 **MM BIO-1: Provide Worker Environmental Awareness Training.** Bandwidth shall  
10 provide environmental awareness training before starting construction activities  
11 for all construction personnel (including new personnel as they are added to the  
12 Project) working on the terrestrial and marine Project components. This training  
13 would be given by biological monitors (approved by CSLC staff) to help the  
14 trainees understand the following:

- 15 • Surrounding common and special-status species and their habitats
- 16 • Sensitive natural communities and ESHAs
- 17 • Applicable regulatory requirements
- 18 • MMs designed to avoid or minimize impacts on sensitive resource areas

19 The training materials shall be developed and approved by CSLC staff at least  
20 30 days before starting Project activities in the terrestrial and marine work areas.  
21 The biological monitors shall maintain a list of all contractors who have been  
22 trained and shall submit this list and the final training material to CSLC staff within  
23 30 days after construction starts and shall provide an updated final list after  
24 construction is completed.

25 The lead biological monitor, which would be the monitor with the most  
26 professional experience if more than one monitor is selected for the Project, shall  
27 be the main contact for reporting any special-status species observed in or near  
28 the Project area by any employee or contractor. Bandwidth shall provide the  
29 contact information for the lead biological monitor and the biological monitors  
30 to on-site construction workers, USFWS, CDFW, and CSLC staff before  
31 construction starts.

32 **Location:** Terrestrial and marine Project areas

1 **Monitoring/Reporting Action:** Training materials approved by CSLC staff at least  
2 30 days before Project activities.

3 On-site biological monitor to submit list of trained personnel and training  
4 materials to CSLC within 30 days of the start of construction and after  
5 completion.

6 **Effectiveness Criteria:** Educating all personnel on potential special-status species  
7 and habitats in the work area

8 **Responsible Party:** Applicant and CSLC

9 **Timing:** Before, during, and after terrestrial and marine Project areas construction

10 **Potential Impact: Biological Resources – Impacts on special-status species and**  
11 **habitats (cont.)**

12 **MM BIO-2: Conduct Biological Surveying and Monitoring.** A biological monitor  
13 (typically with a college degree in a field of biology or environmental science,  
14 knowledge of species surveying for, and experience with pre-construction and  
15 construction monitoring), approved by CSLC staff, shall be present on-site to  
16 survey the work area for special-status species and nesting birds (as applicable)  
17 before starting work in the terrestrial work area to minimize potential impacts on  
18 any special-status species or other wildlife that may be present during Project  
19 construction. Because the eastern cable landing site is adjacent to the shoreline  
20 and the potential western cable sites are not, the biological monitor would also  
21 observe the shoreline adjacent to the eastern cable landing site for special-  
22 status species before starting work in the terrestrial area. When work would  
23 occur at the eastern or western marine HDD exit locations, the biological  
24 monitor would observe the shallow tidal flats surrounding the HDD exit locations  
25 for foraging by special-status species such as birds. Observations of the marine  
26 HDD exit locations would occur from shore.

27 The biological monitor must be on-site full-time during the initial equipment  
28 mobilization and site preparation (including fence installation), during the final  
29 demobilization phase of construction at the cable landing sites, and during all  
30 HDD exit location work (observed from the shore). In addition, the biological  
31 monitor must make weekly site visits during Project construction for all work on  
32 the cable landing site. From shore, the biological monitor would monitor the  
33 work at the HDD exit locations in case of special-status species such as birds  
34 foraging nearby during low tides. While on-site or observing the HDD exit  
35 locations from shore, the biological monitor has the authority to stop all work,  
36 and Bandwidth shall contact the appropriate agency, (i.e., CDFW or USFWS and  
37 Commission staff) to discuss ways to protect the special-status species. If a

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1 biological monitor was not monitoring the Project site during construction when  
2 a special-status species was observed on the site, the biological monitor would  
3 be contacted immediately to determine the appropriate course of action.

4 Construction monitoring reports will be submitted daily during above-described  
5 construction between the OHWM on the eastern and western locations within  
6 CSLC's jurisdiction and otherwise weekly outside of CSLC's jurisdiction.

7 **Location:** Terrestrial and marine Project areas

8 **Monitoring/Reporting Action:** On-site biological monitor to verify.

9 The monitor will submit daily monitoring reports for work within the CSLC's  
10 jurisdiction and weekly reports for work outside the CSLC's jurisdiction.

11 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
12 impacts on special-status species and habitats potentially present.

13 **Responsible Party:** Applicant and CSLC

14 **Timing:** Before and during construction

15 **Potential Impact: Biological Resources – Impacts on special-status species and**  
16 **habitats (cont.)**

17 **MM BIO-3: Delineate Work Limits to Protect Sensitive Biological Resources.**

18 Natural areas outside the construction work area shall not be disturbed. Before  
19 starting Project construction, sensitive biological resource areas within and  
20 adjacent to the cable landing site work areas shall be staked and flagged by  
21 the biological monitor (**MM BIO-2**). The location of the staking and flagging and  
22 barrier fencing, if applicable, would be documented in the daily monitoring log  
23 and provided to CSLC before starting construction. These demarcated areas  
24 shall be inspected daily by construction personnel throughout the construction  
25 area to make sure that they are visible for construction personnel. If construction  
26 personnel note damage to the demarcated areas, they shall notify the  
27 biological monitor, who will come to the site, if not present, and fix the barriers.

28 **Location:** Terrestrial Project areas

29 **Monitoring/Reporting Action:** On-site biological monitor to delineate and  
30 document in the monitoring log.

31 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
32 impacts on special-status species and habitats potentially present.

33 **Responsible Party:** Applicant and CSLC

34 **Timing:** Before and during construction

**Potential Impact: Biological Resources – Impacts on sensitive biological resources**

**MM BIO-4: Install Covers or Escape Ramps in Open Trenches.** To prevent wildlife species from accidentally being entrapped during construction, all excavated holes to be left open overnight shall have a cover or soil ramp installed, allowing wildlife an opportunity to exit. If escape ramps are installed, the construction inspector or the biological monitor must inspect excavations before starting construction each day to confirm that no wildlife species are entrapped. If any wildlife species are entrapped and the biological monitor is not on the site, the construction inspector shall notify the biological monitor, who will travel to the site to remove wildlife species that are unable to escape on their own. Any wildlife handling shall be conducted under the biological monitor’s applicable collection permit or as authorized by the appropriate wildlife agency. If a biological monitor is not on-site, a local biologist (with appropriate permits) may be called out to remove any species.

**Location:** Terrestrial Project areas

**Monitoring/Reporting Action:** On-site construction inspector/monitor to inspect daily before starting construction.

**Effectiveness Criteria:** Implementation of this MM will reduce the potential for impacts on wildlife species potentially present.

**Responsible Party:** Applicant and CSLC

**Timing:** During construction

**Potential Impact: Biological Resources – Impacts on nesting birds**

**MM BIO-5: Conduct Pre-Construction Nesting Bird Surveys and Implement Avoidance Measures.** If construction occurs during the bird nesting season (from February 1 to September 1), the following conditions (designed to protect both special-status and non-special-status birds) shall be implemented:

- No more than 1 week before starting Project-related construction, a biological monitor, approved by CSLC staff, shall survey within the biological study areas to look for nesting activity.
- If no active nests are detected during these surveys, no additional measures are required.
- If an active nest is found, an appropriate avoidance buffer shall be established around the bird nest site to avoid disturbance or destruction of the nest until the end of the breeding season (generally August 31) or



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1           until after the biological monitor determines that the young have fledged  
2           and moved out of the area (this date varies by species). Suitable buffer  
3           distances may vary between species. The extent of these buffers shall be  
4           determined by the biological monitor in coordination with the applicable  
5           wildlife agency (i.e., CDFW and/or USFWS) and would depend on the bird  
6           species, level of construction disturbance, line-of-sight between the nest  
7           and the disturbance, ambient levels of noise and other disturbances, and  
8           other topographical or artificial barriers. Disturbances shall not occur  
9           within the protective buffer(s) until all young birds have fledged, as  
10          confirmed by the biological monitor.

- 11          • A biological monitor shall be hired by Bandwidth, approved by the CSLC  
12          (**MM BIO-2**), and shall be on-site every day if construction activities  
13          happen during bird nesting season and a nest is identified within the  
14          protective buffer area.

15   **Location:** Terrestrial Project areas

16   **Monitoring/Reporting Action:** If construction occurs during the nesting season,  
17   conduct nesting bird surveys 1 week before starting Project construction.

18   On-site biological monitor to verify and coordinate with USFWS/CDFW.

19   **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
20   impacts on nesting birds.

21   **Responsible Party:** Applicant and CSLC

22   **Timing:** Before and during construction

### 23   **Potential Impact: Biological Resources – Impacts on herring spawning**

24   **MM BIO-6: In-Water Work Window.** In-water work would occur only from June 1  
25   through November 30 to protect herring spawning populations ~~and adult longfin~~  
26   ~~smelt migrating to and from spawning locations.~~

27   **Location:** Marine Project area

28   **Monitoring/Reporting Action:** Contract specifications.

29   **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
30   Pacific herring to be impacted during the spawning season.

31   **Responsible Party:** Applicant

32   **Timing:** Before construction

1 **Potential Impact: Biological Resources – Impacts on fish species, including**  
2 **longfin smelt**

3 **MM BIO-7: Fish Screen on the Jet Sled Intake.** A screen would be installed on the  
4 jet sled intake to reduce the chance of fish being pulled into the jet sled intake  
5 with the jetting water. The fish screen would adhere to the following criteria,  
6 provided by the California Department of Fish and Wildlife:

- 7 • The screen will be designed to allow uniform flow distribution through the  
8 entire face of the screen during use.
- 9 • If the screen is self-cleaning, the specific screen intake velocity will be  
10 0.2 feet per second, which is the protection velocity for delta smelt  
11 (*Hypomesus transpacificus*) and is also considered protective of longfin  
12 smelt. If the screen is not self-cleaning, the screen will be designed so that  
13 the approach velocity is one fourth of the self-cleaning approach velocity  
14 (0.05 feet per second). For non-self-cleaning screens, the frequency of  
15 cleaning will be such that flow is not impaired and approach velocity is  
16 not exceeded. A cleaning frequency of once per 5 minutes is considered  
17 appropriate.
- 18 • The required screen area in square feet will be determined by dividing the  
19 maximum diverted flow (cubic feet per second) by the allowable  
20 approach velocity (feet per second) to get square feet of screen area  
21 needed.
- 22 • The screen surface will have a minimum open area of 27 percent, but  
23 open areas of 40 percent or greater are recommended. Round openings  
24 will not exceed 5/32 inch (3.96 millimeter). Square openings will not  
25 exceed 5/32 inch (3.96 millimeters) diagonally. Slotted openings will not  
26 exceed ~~3/32~~0.0689 inch (~~2.38~~1.75 millimeters).
- 27 • Screens can be constructed of any rigid material that allows water  
28 passage but excludes fish. Stainless steel is recommended to reduce  
29 corrosion-associated clogging. No sharp edges or projections that could  
30 harm fish will be present. The largest screen open area possible for the  
31 project should be used. If anti-fouling materials are used, they should not  
32 be deleterious to fish or other wildlife.
- 33 • The intake with the screen cover will be placed in the deepest area of  
34 water possible for the jet sled location.

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- 1 • The plans and design of the fish screen showing the applicable screening  
2 criteria will be provided to the California Department of Fish and Wildlife  
3 for approval.

4 **Location:** Marine Project area

5 **Monitoring/Reporting Action:** Equipment design specifications. Approval  
6 required from California Department of Fish and Wildlife.

7 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
8 longfin smelt to be impacted during Project activities.

9 **Responsible Party:** Applicant

10 **Timing:** Before construction

11 **Potential Impact: Biological Resources – Impacts on marine species from**  
12 **entanglement with unburied cable**

13 **MM BIO-8: Cable Burial Surveys.** Bandwidth would conduct an initial survey and  
14 periodic post-lay surveys of all installed fiber optic cables and conduits between  
15 the mean high tide lines to verify that the fiber optic cables and conduits were  
16 and would remain buried as initially planned or to the maximum extent feasible  
17 as determined by the initial post-lay assessment. These surveys would assess and  
18 report the following to CSLC:

- 19 • The depth of burial achieved along the fiber optic cable route.
- 20 • Any areas of fiber optic cable or conduit suspension greater than 3.3 feet  
21 from the SF Bay floor and an explanation of why the fiber optic cables  
22 could not be rerouted to avoid suspension.
- 23 • The consistency of fiber optic cable installation with the Project  
24 description.

25 These post-lay surveys and assessments would be conducted as follows:

- 26 • “As-built” plans showing where the improvements have been placed  
27 would be provided within 60 days of completing construction and  
28 additional post-lay surveys at a frequency to be determined by lease  
29 conditions.
- 30 • After any incident or activity, including but not limited to potential  
31 commercial fishing gear snags, severe earthquake in the vicinity of the  
32 fiber optic cables, or an extreme storm event that could result in excessive  
33 SF Bay floor scouring, that could result in the fiber optic cables or conduit  
34 exposure to the SF Bay floor surface.

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1       Should a fiber optic cable be observed to have become unburied in any  
2       location where it should have been buried or had been buried, Bandwidth  
3       shall ensure reburial to the initial fiber optic cable burial depth at that  
4       location. A survey and burial report would be prepared and distributed to  
5       the CSLC and other responsible state agencies after each survey.

6       **Location:** Marine Project area

7       **Monitoring/Reporting Action:** Conduct a post-lay inspection survey at a  
8       frequency to be determined. The burial survey report will be distributed to  
9       responsible State agencies following each survey.

10      **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
11      marine wildlife to be exposed to the cable and the potential for entanglement.

12      **Responsible Party:** Applicant and CSLC

13      **Timing:** After construction

### 14      **Potential Impact: Biological Resources – Impacts on marine wildlife**

15      **MM BIO-9: Cable Entanglements and Gear Retrieval.** If fishing gear snags on a  
16      fiber optic cable and it is lost or cut, or if Bandwidth snags fishing gear,  
17      Bandwidth shall use all feasible measures (for example, deploying divers), in  
18      discussion with and guided by the local Fishing Association (San Francisco  
19      Community Fishing Association), to retrieve the fishing gear or inanimate object.  
20      Retrieval shall occur no later than 42 days after discovering or receiving notice  
21      of the incident. If full removal of gear is not feasible, Bandwidth shall remove as  
22      much gear as practicable to minimize harm to wildlife (e.g., fishes, birds, and  
23      marine mammals). Within 14 days of completing the recovery operation,  
24      Bandwidth shall submit to CSLC staff a report describing the following:

- 25           • Nature and location of the entanglement (with a map and/or GPS  
26           coordinates).
- 27           • Method used for removing the entangled gear or object, or the method  
28           used for minimizing harm to wildlife if gear retrieval proves infeasible.

29      **Location:** Marine Project area

30      **Monitoring/Reporting Action:** Retrieval of gear within 42 days of discovery.  
31      Submit recovery report to CSLC within 14 days of completing the recovery  
32      operation.

33      **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
34      impacts on marine species potentially present.

35      **Responsible Party:** Applicant and CSLC

1 **Timing:** Before, during, and after construction

2 **Potential Impact: Biological Resources – Impacts on marine native species**

3 **MM BIO-10: Control of Marine Invasive Species.** Bandwidth shall ensure that the  
4 underwater surfaces of all Project vessels are clear of biofouling organisms  
5 before arriving in state waters. The determination of underwater surface  
6 cleanliness shall be made in consultation with CSLC staff. Regardless of vessel  
7 size, ballast water for all Project vessels must be managed consistent with the  
8 CSLC’s ballast management laws and regulations, and Ballast Water  
9 Management Report and a Marine Invasive Species Program Annual Vessel  
10 Reporting Form shall be submitted to CSLC staff at least 24 hours in advance of  
11 arrival in state waters, as required by regulation.

12 **Location:** Marine Project area

13 **Monitoring/Reporting Action:** On-site monitor to verify:

14 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
15 impacts on marine native species.

16 **Responsible Party:** Applicant and CSLC

17 **Timing:** During marine construction

18 **Other applicable MMs for potential impacts on biological resources**

19 **MM HYD-1: Develop and Implement Stormwater Pollution Prevention Plan** (see  
20 Hydrology and Water Quality)

21 **MM HAZ-1: Develop and Implement Spill Contingency and Hazardous Materials**  
22 **Management Plans.** (see Hazards and Hazardous Materials)

23 **MM HAZ-2: Prepare and Implement an Inadvertent Return Contingency Plan** (see  
24 Hazards and Hazardous Materials)

25 **1.4.3 CULTURAL RESOURCES**

26 **Potential Impact: Cultural Resources – Impacts to shipwrecks, archaeological**  
27 **sites, and/or historic, cultural, or tribal resources**

28 **MM CUL-1/TCR-1: Discovery of Previously Unknown Cultural or Tribal Cultural**  
29 **Resources.** Before disturbing the ground, Bandwidth shall contact culturally  
30 affiliated tribes and retain a culturally affiliated tribal monitor if requested.  
31 Bandwidth shall also retain a qualified archaeologist, jointly with any requested  
32 culturally affiliated tribal monitor, to train construction staff to be able to identify  
33 potential cultural and tribal cultural resources. If potential cultural or tribal

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1 cultural resources are uncovered during Project implementation, all earth-  
2 disturbing work within 100 feet of the find must be suspended or redirected until  
3 an approved archaeologist and tribal monitor, if retained, has evaluated the  
4 nature and significance of the discovery.

5 If a potentially significant cultural or tribal cultural resource is discovered, the  
6 CSLC, and any local, state, or federal agency with approval or permitting  
7 authority over the Project that has requested and/or required notification shall  
8 be notified within 48 hours. The location of any such finds must be kept  
9 confidential and measures shall be taken to secure the area from site  
10 disturbance and potential vandalism. Impacts on previously unknown significant  
11 cultural or tribal cultural resources shall be avoided through preservation in  
12 place if feasible. Damaging effects on tribal cultural resources shall be avoided  
13 or minimized following the measures identified in Public Resources Code section  
14 21084.3, subdivision (b), if feasible, unless other measures are mutually agreed to  
15 by the lead archaeologist and culturally affiliated tribal monitor that would be  
16 as or more effective. A treatment plan, if needed to address a find, shall be  
17 developed by the archaeologist and, for tribal cultural resources, the culturally  
18 affiliated tribal monitor, and submitted to CSLC staff for review and approval  
19 prior to implementation of the plan. If the archaeologist or tribe determines that  
20 damaging effects on the cultural or tribal cultural resource shall be avoided or  
21 minimized, then work in the area may resume.

22 Title to all abandoned shipwrecks, archaeological sites, historic or cultural  
23 resources, and tribal cultural resources on or in the tide and submerged lands of  
24 California is vested in the state and under CSLC jurisdiction. The final disposition  
25 of archaeological, historical, and tribal cultural resources recovered on state  
26 lands under CSLC jurisdiction must be approved by CSLC.

27 **Location:** Terrestrial and marine Project areas

28 **Monitoring/Reporting Action:** Qualified archaeologist retained and notification  
29 of permitting agencies. A treatment plan may be developed as needed.

30 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
31 impacts on archaeological resources.

32 **Responsible Party:** Applicant and CSLC

33 **Timing:** Before and during construction

**Potential Impact: Cultural Resources – Impacts to human remains**

**MM CUL-2/TCR-2: Unanticipated Discovery of Human Remains.** If human remains are encountered, all provisions provided in California Health and Safety Code section 7050.5 and California Public Resources Code section 5097.98 shall be followed. Work shall stop within 100 feet of the discovery, and both an archaeologist and CSLC staff must be contacted within 24 hours. The archaeologist shall consult with the County Coroner. If human remains are of Native American origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of this determination, and a Most Likely Descendent shall be identified. No work is to proceed in the discovery area until consultation is complete and procedures to avoid or recover the remains have been implemented.

**Location:** Terrestrial Project areas

**Monitoring/Reporting Action:** Contact retained archaeologist and the CSLC within 24 hours of discovery.

Archaeologist will consult with County Coroner.

**Effectiveness Criteria:** Implementation of this MM will reduce the potential for impacts on human remains.

**Responsible Party:** Applicant and CSLC

**Timing:** During construction

**Potential Impact: Cultural Resources – Impacts to previously unknown terrestrial archaeological resources**

**MM CUL-3/TCR-3: Cultural and Tribal Resources Awareness Training.** Before beginning construction, Bandwidth must hire a qualified archaeologist and a culturally affiliated tribal monitor (if requested by culturally affiliated tribes) to prepare a Cultural Resources Contractor Awareness Training subject to CSLC approval. The training shall be given by a qualified archaeologist and a culturally affiliated tribal monitor (if one is available) to all construction personnel before working on the Project, and the training shall include, but not be limited to, the following:

- Guidance on identifying potential cultural resources encountered
- The probability of exposing cultural resources
- Clear direction on procedures if a find is encountered

**Location:** Terrestrial Project areas

1 **Monitoring/Reporting Action:** Qualified archaeologist retained and training for  
2 all personnel prior to working on the Project.

3 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
4 impacts on archaeological resources.

5 **Responsible Party:** Applicant and CSLC

6 **Timing:** Before construction

#### 7 **1.4.4 CULTURAL RESOURCES - TRIBAL**

8 **Applicable mitigation measures for potential impacts on cultural resources -**  
9 **tribal**

10 **MM CUL-1/TCR-1: Discovery of Previously Unknown Cultural or Tribal Cultural**  
11 **Resources** (see Cultural Resources)

12 **MM CUL-2/TCR-2: Unanticipated Discovery of Human Remains** (see Cultural  
13 Resources)

14 **MM CUL-3/TCR-3: Cultural and Tribal Resources Awareness Training** (see Cultural  
15 Resources)

#### 16 **1.4.5 GREENHOUSE GAS EMISSIONS**

17 **Applicable mitigation measures for potential impacts of greenhouse gas**  
18 **emissions**

19 **MM AIR-1: Use of Tier 4 Equipment** (see Air Quality)

20 **MM AIR-2: Standard Control Measures for Construction Equipment** (see Air  
21 Quality)

#### 22 **1.4.6 HAZARDS AND HAZARDOUS MATERIALS**

23 **Potential Impact: Hazards and hazardous materials – Impacts from accidental**  
24 **release of hazardous materials**

25 **MM HAZ-1: Develop and Implement Spill Contingency and Hazardous Materials**  
26 **Management Plans.** At least 30 days before start of construction of the Project,  
27 Bandwidth shall submit the following plans for review and approval by CSLC  
28 staff:

#### 29 **Worker Health and Safety Plan**

30 A final Worker Health and Safety Plan (WHSP) that has been reviewed and  
31 approved by the San Mateo County Divisions of Environmental Health shall



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1 address measures to minimize risks from landfill gases and potential worker  
2 exposure to hazardous materials associated with construction activities at the  
3 western cable landing sites and within 1,000 feet of the former Brisbane Landfill.  
4 The WHSP shall be prepared by a qualified geologist or engineer.

5 A. The WHSP shall include, at a minimum, measures to:

6 a) Address the potential for the presence and migration of landfill gases  
7 during construction.

8 b) Minimize risks of exposure by construction workers to anticipated  
9 hazardous materials, to potential unanticipated waste types, and to  
10 potential landfill gas accumulation post-construction by operational and  
11 maintenance personnel.

12 c) Assure Project stability and structural integrity associated with any  
13 incompetent waste fill material that may be present.

14 B. Bandwidth shall undertake development in accordance with the approved  
15 final WHSP. Any proposed changes to the approved final WHSP shall be  
16 reported to CSLC and San Mateo County Division of Environmental Health.  
17 No changes to the approved final WHSP shall occur without written approval  
18 from CSLC and San Mateo County Division of Environmental Health.

### 19 **Soil and Waste Excavation and Management Plan**

20 A final Soil and Waste Excavation and Management Plan (SWEMP) that has  
21 been reviewed and approved by the San Mateo County Division of  
22 Environmental Health shall address soil and waste management for construction  
23 activities at the western cable landing sites. The SWEMP shall be prepared by a  
24 qualified geologist or engineer.

25 A. The SWEMP shall include, at a minimum, the following:

26 a) A description of the specific locations, methods, and procedures for  
27 staging, stockpiling, managing, characterizing, testing, and disposing of  
28 soil (including bentonite material), groundwater, and waste material  
29 expected to be encountered during construction.

30 b) Procedures for managing unanticipated waste types that may be  
31 encountered during construction.

32 c) BMPs for odor and dust control, including, but not limited to, measures to  
33 reduce the potential for exposure of staged and stockpiled materials to  
34 wind and stormwater runoff.

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- 1 d) Provisions for characterizing and testing soil, groundwater, and waste  
2 material in accordance with California Department of Toxic Substances  
3 Control (DTSC) Protocol for Burn Dump Site Investigation and  
4 Characterization. Testing should include, at a minimum, volatile organic  
5 compounds (VOCs), semi-volatile organic compounds (SVOCs),  
6 polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons  
7 (PAHs), dioxins and furans, organochlorine pesticides (OCPs), and  
8 California Administrative Metals (CAM-17) heavy metals.
- 9 e) Provisions for proper waste disposal at authorized facilities capable of  
10 receiving the waste(s).
- 11 B. Bandwidth shall undertake development in accordance with the approved  
12 final SWEMP. Any proposed changes to the approved final SWEMP shall be  
13 reported to CSLC and San Mateo County Division of Environmental Health.  
14 No changes to the approved final SWEMP shall occur without written  
15 approval from CSLC and San Mateo County Division of Environmental Health.

### 16 **Spill Contingency and Hazardous Materials Terrestrial Plan**

17 Measures for terrestrial operations shall include, but not be limited to, identifying  
18 appropriate fueling and maintenance areas for equipment, a daily equipment  
19 inspection schedule, and spill response procedures including maintaining spill  
20 response supplies on-site. The Spill Contingency and Hazardous Materials  
21 Terrestrial Plan (SCHMTP) could be prepared separately or the elements of the  
22 SCHMTP could be included in the SWEMP.

23 The terrestrial SCHMTP will identify the actions and notifications to occur if  
24 contaminated soil is encountered during onshore excavation. Bandwidth shall  
25 notify the of San Mateo and Alameda Counties' Divisions of Environmental  
26 Health within 24 hours of discovering contaminated materials during Project  
27 construction activities. Work in the area suspected of contamination shall stop  
28 until the notified agencies, together with Bandwidth, have determined the next  
29 steps.

30 The terrestrial SCHMTP will identify, at a minimum, the following BMPs related to  
31 using hazardous substances:

- 32 • Follow manufacturer's recommendations on use, storage, and disposal of  
33 chemical products used in construction.
- 34 • Avoid overtopping construction equipment fuel gas tanks.

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- 1 • During routine maintenance of construction equipment, properly contain  
2 and remove grease and oils.
- 3 • Conduct all fueling of equipment at least 100 feet from wetlands and  
4 other waterbodies.
- 5 • Properly dispose of discarded containers of fuels and other chemicals.
- 6 • Maintain a complete list of agencies (with their telephone numbers) to be  
7 notified of potential hazardous material spills, including but not limited to,  
8 the CSLC's 24-hour emergency notification number and the California  
9 Governor's Office of Emergency Services (Cal OES) contact number.

### 10 **Spill Contingency and Hazardous Materials Offshore Plan**

11 For offshore activities involving work vessels, the primary work vessel (cable-lay  
12 vessel) will be required to carry onboard a minimum 400 feet of sorbent boom,  
13 five bales of sorbent pads at least 18 inches by 18 inches square, and a small,  
14 powered vessel for rapid deployment to contain and clean up any small  
15 hazardous material spill or sheen on the water surface. The Spill Contingency  
16 and Hazardous Materials Offshore Plan (SCHMOP) shall provide for the  
17 immediate call out of additional spill containment and clean-up resources in the  
18 event of an incident that exceeds the rapid clean-up capability of the on-site  
19 work force. These offshore measures may be provided as part of a separate  
20 SCHMOP or combined with the terrestrial plan (SCHMTP) as described above.

21 **Location:** Terrestrial and marine Project areas

22 **Monitoring/Reporting Action:** All plans to be submitted to CSLC at least 30 days  
23 prior to start of construction.

24 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for a  
25 release of hazardous materials to the environment.

26 **Responsible Party:** Applicant

27 **Timing:** Before and during construction

28 **Potential Impact: Hazards and hazardous materials – Impacts from horizontal**  
29 **directional drilling (HDD) activities**

### 30 **MM HAZ-2: Prepare and Implement an Inadvertent Return Contingency Plan.** A

31 Final Inadvertent Return Contingency Plan (either one report that describes a  
32 plan for both terrestrial and marine areas or separate reports for each area)  
33 shall be submitted to CSLC staff for review and approval at least 30 days before  
34 starting construction in terrestrial and marine areas. The plan(s) must include the  
35 following:

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- 1 • Measures to stop work, maintain appropriate control materials on-site,  
2 contain and remove drilling mud before demobilization, prevent further  
3 migration of drilling mud into the waterbody, and notify all applicable  
4 authorities in the case of an inadvertent return of any size.
- 5 • Control measures of constructing a dugout or settling basin at the cable  
6 landing site to contain drilling mud to prevent sediment and other  
7 deleterious substances from entering waterbodies.
- 8 • Requirements for onshore biological monitors to monitor onshore and  
9 offshore to identify signs of an inadvertent release of drilling fluids, which  
10 may include the use of Rhodamine dye.
- 11 • An abandonment contingency plan in case the HDD operations are  
12 forced to be suspended and a partially completed bore hole is  
13 abandoned.
- 14 • Complete list of the agencies (with telephone number) to be notified in  
15 case of an inadvertent return of any size, including, but not limited to, the  
16 CSLC's 24-hour emergency notification number (562) 590-5201 and the  
17 California Governor's Office of Emergency Services (Cal OES) contact  
18 number (800) 852-7550.

19 **Location:** Terrestrial Project areas

20 **Monitoring/Reporting Action:** Submit report to the CSLC at least 30 days before  
21 starting construction.

22 Onshore and offshore biological monitors to identify signs of an inadvertent  
23 release of drilling fluids.

24 **Effectiveness Criteria:** Implementation of this MM will reduce the potential for  
25 impacts on wildlife species potentially present.

26 **Responsible Party:** Applicant and CSLC

27 **Timing:** Before and during construction

28 **Other applicable MMs for potential impacts on hazards and hazardous**  
29 **materials**

30 **MM BIO-1: Provide Environmental Awareness Training** (see Biological Resources)

31 **MM BIO-3: Delineate Work Limits to Protect Sensitive Biological Resources** (see  
32 Biological Resources)

1 **1.4.7 HYDROLOGY AND WATER QUALITY**

2 **Potential Impact: Hydrology and Water Quality – Impacts on hydrology and**  
3 **water quality**

4 **MM HYD-1: Develop and Implement Stormwater Pollution Prevention Plan.**

5 Bandwidth shall develop and implement a Stormwater Pollution Prevention Plan  
6 (SWPPP) consistent with the Statewide NPDES Construction General Permit  
7 (Order 2009-0009-DWQ). At a minimum, the SWPPP shall include measures for:

- 8 • Maintaining adequate soil moisture to prevent excessive fugitive dust  
9 emissions, preservation of existing vegetation, and effective soil cover  
10 (e.g., geotextiles, straw mulch, hydroseeding) for inactive areas and  
11 finished slopes to prevent sediments from being dislodged by wind, rain, or  
12 flowing water.
- 13 • Installing fiber rolls and sediment basins to capture and remove particles  
14 that have already been dislodged.
- 15 • Establishing good housekeeping measures such as construction vehicle  
16 storage and maintenance, handling procedures for hazardous materials,  
17 and waste management BMPs, including procedural and structural  
18 measures to prevent the release of wastes and materials used at the site.

19 The SWPPP shall also detail spill prevention and control measures to identify the  
20 proper storage and handling techniques of fuels and lubricants, and the  
21 procedures to follow in the event of a spill. The SWPPP shall be provided to CSLC  
22 staff a minimum of 30 days prior to Project implementation.

23 **Location:** Terrestrial Project areas

24 **Monitoring/Reporting Action:** Develop SWPPP and provide to CSLC 30 days prior  
25 to Project implementation.

26 **Effectiveness Criteria:** Implementation of this MM will reduce the Project impacts  
27 on hydrology and water quality.

28 **Responsible Party:** Applicant and CSLC

29 **Timing:** During construction

1 **Other applicable MMs for potential impacts on hydrology and water quality**

2 **MM HAZ-1: Develop and Implement Spill Contingency and Hazardous Materials**  
3 **Management Plans** (see Hazards and Hazardous Materials)

4 **MM HAZ-2: Prepare and Implement an Inadvertent Return Contingency Plan** (see  
5 Hazards and Hazardous Materials)

6 **1.4.8 NOISE**

7 **Potential Impact: Noise – Impacts on sensitive receptors**

8 **MM NOI-1: Implement Construction Noise Control Measures.** The Applicant shall  
9 ensure that its contractor implements specific noise attenuation measures to  
10 ensure compliance with applicable City and County noise ordinances for the  
11 duration of the construction period. Noise measures shall include the following  
12 and shall be included in the construction specifications:

- 13 • Limit construction activities to the hours specified in each local noise  
14 ordinance.
- 15 • Maintain all equipment in accordance with manufacturer's  
16 recommendations to minimize noise emissions.
- 17 • Inspect all gasoline and diesel-powered equipment to ensure they are  
18 equipped with properly functioning exhaust mufflers and intake silencers.
- 19 • Limit unnecessary idling.
- 20 • Use low noise emission equipment where feasible and practical.

21 **Location:** Terrestrial Project areas

22 **Monitoring/Reporting Action:** Contract specifications

23 **Effectiveness Criteria:** Implementation of this MM will reduce the Project impacts  
24 on sensitive receptors.

25 **Responsible Party:** Applicant and CSLC

26 **Timing:** Before and after construction

1 **1.4.9 RECREATION**

2 **Potential Impact: Recreation – Impacts on offshore recreational activities**

3 **MM REC-1: Advanced Local Notice to Mariners.** At least 15 days before (1) start  
4 of the HDD operation, and (2) start of offshore cable laying activity, a Local  
5 Notice to Mariners ([https://www.dco.uscg.mil/Featured-Content/Mariners/  
6 Local-Notice-to-Mariners-LNMs/District-11/](https://www.dco.uscg.mil/Featured-Content/Mariners/Local-Notice-to-Mariners-LNMs/District-11/)) would be submitted to the USCG  
7 describing all activities in the SF Bay. A copy of the published notice shall be  
8 provided immediately to CSLC. The Notice must include:

- 9
- 10 • Type of operation (i.e., jet sledding, diving operations, construction)
  - 11 • Specific location of operation or repair activities (including whether there  
12 is a possibility of exposed cable), including latitude and longitude and  
13 geographical position, if applicable
  - 14 • Estimated schedule of activities, including start and completion dates (if  
15 these dates change, the USCG needs to be notified)
  - 16 • Vessels involved in the operation
  - 17 • VHF-FM radio frequencies monitored by vessels on the scene
  - 18 • Point of contact and 24-hour phone number
  - Chart number for the area of operation

19 **Location:** Marine Project area

20 **Monitoring/Reporting Action:** Local Notice to Mariners submitted to USCG at  
21 least 15 days prior to (1) start of HDD operation and (2) start of offshore cable  
22 laying.

23 A copy of the published notice will be submitted to CSLC immediately.

24 **Effectiveness Criteria:** Implementation of this MM will reduce the Project impacts  
25 on offshore recreational activities.

26 **Responsible Party:** Applicant and CSLC

27 **Timing:** Before and after construction

1 **1.4.10 TRANSPORTATION**

2 **Potential Impact: Transportation – Impacts on local marine vessel traffic**

3 **MM TRA-1: Marine Anchor Plan.** At least 30 days before starting construction,  
4 Bandwidth will submit a Marine Anchor Plan to CSLC staff for review and  
5 approval with the following:

- 6 • Map of the proposed acceptable anchor locations and exclusion zones  
7 or offshore temporary anchoring or mooring for work vessels.
- 8 • Narrative description of the anchor setting and retrieval procedures to be  
9 employed that will result in minimal impacts on the bay sediments and  
10 floor. Anchor dragging along the bay bottom is not allowed.
- 11 • Coordinates of all dropped anchor points during construction shall be  
12 recorded and included on the post-construction bay floor survey map.

13 **Location:** Marine Project area

14 **Monitoring/Reporting Action:** Provide plan to CSLC 30 days prior to construction

15 **Effectiveness Criteria:** Implementation of this MM will reduce the Project impacts  
16 on local vessel traffic and provide safe anchoring.

17 **Responsible Party:** Applicant and Applicant's contractor

18 **Timing:** Before and during construction

19 **Potential Impact: Transportation – Reduce hazards on local roadways**

20 **MM TRA-2: Traffic Control Plan.** Before starting the Project activities, a Traffic  
21 Control Plan shall be submitted to CSLC staff for review and approval. It shall  
22 include measures such as appropriate signage, detour routes, and lane closure  
23 to reduce potential hazards to motorists and workers during the Project. In  
24 addition, the Traffic Control Plan shall address measures to allow emergency  
25 vehicle access, and reduction of impacts to circulation, potential hazards to  
26 motorists, bicyclists, pedestrians, and workers during the Project.

27 **Location:** Terrestrial Project areas

28 **Monitoring/Reporting Action:** Provide plan to CSLC 30 days prior to construction

29 **Effectiveness Criteria:** Implementation of this MM will reduce the Project impacts  
30 on local traffic.

31 **Responsible Party:** Applicant and Applicant's contractor

32 **Timing:** Before construction



1 **Other applicable MMs for potential impacts on transportation**

2 **MM REC-1: Advanced Local Notice to Mariners** (see Recreation)

3 **1.4.11 COMMERCIAL AND RECREATIONAL FISHING**

4 **Applicable mitigation measures for potential impacts on commercial and**  
5 **recreational fishing**

6 **MM BIO-7: In-Water Work Window** (see Biological Resources)

7 **MM BIO-8: Fish Screen on the Jet Sled Intake** (see Biological Resources)

8 **MM BIO-9: Cable Burial Surveys** (see Biological Resources)

9 **MM BIO-10: Cable Entanglement and Gear Retrieval** (see Biological Resources)

10 **MM BIO-11: Control of Marine Invasive Species** (see Biological Resources)

11 **MM REC-1: Advanced Local Notice to Mariners** (see Recreation)

12 **MM TRA-1: Marine Anchor Plan** (see Transportation)

13 **1.4.12 LIST OF ABBREVIATIONS AND ACRONYMS**

14 Applicant = Bandwidth IG ~~Infrastructure Group~~, LLC

15 BIO = Biological

16 BMP = best management practice

17 Cal OES = California Governor's Office of Emergency Services

18 CAM = California Administrative Metals

19 CARB = California Air Resources Board

20 CDFW = California Department of Fish and Wildlife

21 CEQA = California Environmental Quality Act

22 CNG = compressed natural gas

23 CSLC = California State Lands Commission

24 CUL = Cultural

25 DTSC = California Department of Toxic Substances Control

26 ESHA = environmentally sensitive habitat area

27 HAZ = Hazardous

28 HDD = horizontal directional drilling

29 HYD = Hydrology

30 LNG = liquefied natural gas

31 MM = mitigation measure

32 MMP = Mitigation Monitoring Program

33 NAHC = Native American Heritage Commission

34 NOI = Noise

35 NPDES = National Pollutant Discharge Elimination System

36 OCPs = organochlorine pesticides

## Appendix C – Mitigation Monitoring Program

- 1 OHWM = ordinary high water mark
- 2 PAHs = polycyclic aromatic hydrocarbons
- 3 PCBs = polychlorinated biphenyls
- 4 REC = Recreation
- 5 SCHMOP = Spill Contingency and Hazardous Materials Offshore Plan
- 6 SCHMTP = Spill Contingency and Hazardous Materials Terrestrial Plan
- 7 SF Bay = San Francisco Bay
- 8 SVOCs = semi-volatile organic compounds
- 9 SWEMP = Solid Waste Excavation and Management Plan
- 10 SWPPP = Stormwater Pollution Prevention Plan
- 11 TCR = Tribal Cultural Resources
- 12 TRA = Transportation
- 13 USCG = U.S. Coast Guard
- 14 USFWS = U.S. Fish and Wildlife Service
- 15 VHF-FM = very high frequency – frequency modulation
- 16 VOCs = volatile organic compounds
- 17 WHSP = Worker Health and Safety Plan