PROJECT MEMORANDUM
PARADISE AREA REINFORCEMENT PROJECT

To: Beth Shipley, CPUC
From: Matt Fagundes, Deputy Project Manager
Date: May 14, 2001
Re: Mitigation Monitoring Report No. 3: April 1 – May 1, 2001

The following descriptions of compliance and monitoring activities for the Paradise Area Reinforcement Project are from a combination of field monitoring notes collected by the CPUC Environmental Monitor, and project summary reports supplied to Aspen Environmental Group by Steve Stielstra, Senior Land Projects Analyst for PG&E Co.

SUMMARY

This Mitigation Monitoring Report provides a general update of construction activities associated with the Paradise Area Reinforcement Project. It also describes mitigation measures that have been implemented to date in accordance with the Project’s Mitigated Negative Declaration. More detailed mitigation compliance information is in the accompanying table prepared by PG&E Co. This table is updated for each monthly status report, with completed items moved to the end of the table. This report represents all activities from April 1, 2001 to May 1, 2001.

Work conducted during this time period was primarily associated with augering activities along the power line right-of-way, and tree trimming and removal operations along Neal Road.

CONSTRUCTION ACTIVITIES

Vegetation Clearing

A vegetation removal walk-down was conducted during the week of April 16 by representatives from PG&E Co.’s tower construction and vegetation management crews to determine if additional tree trimming or removal would be required for the power line conductor installation and operation. PG&E Co.’s biologist and the project’s environmental inspector also participated. It was determined that 17 additional trees would need to be trimmed and 7 removed. The decision to trim or remove trees was based on maintaining clearance requirements for conductor installation and for safe and reliable operation.

Because the vegetation removal would take place between March 1 and July 31, PG&E Co.’s biologist began surveying for nesting birds on the morning of Wednesday, April 18 during a period of warm, sunny weather when nesting birds are most active. By late afternoon, the weather became overcast with showers and the survey was postponed. Surveys were completed the following day on several parcels, and no nesting birds were found. Additional surveys were completed the following week on the two remaining parcels.

PG&E Co.’s biologist completed nesting bird surveys from the Paradise Substation to pole 5/58 (where the line leaves Neal Road). Trees marked for trimming or removal and trees adjacent to the trees marked for trimming or removal were surveyed and no nesting birds were identified.
Clearing operations resumed the week of April 23 where additional tree trimming or removal has been identified to be necessary in areas where easements on several private properties have recently been acquired. PG&E Co.’s biologist and PG&E Co.’s clearing supervisor are working closely to ensure that work only occurs in areas that have been surveyed for nesting birds.

**Power Line Construction**

The hole for the pole adjacent to the small creek between Foster Road and Neal Road has been drilled. The pole location was accessed by the equipment from the south side of the creek to avoid impacts to the waterbody. Spoil from the hole was placed in the work area away from the creek, and immediately moved off-site.

Minimal power line construction was conducted on the project during the weeks of April 9 and April 16 as a result of two separate instances where the auger bit was damaged after striking boulders.

Foundation hole drilling resumed during the week of April 23. However, work was limited to areas accessible to the truck-mounted auger (i.e., level ground and no overhead lines or trees). This included one hole at the south end of the trailway and one hole on the north side of Princeton Way. There are two additional holes to be drilled along the trailway before auguring is complete in this area.

The foundation crew has mobilized and will start pouring foundations the week of May 1. The pouring crew is small, consisting of a foreman and five workers. The crew will receive environmental compliance training prior to their commencement of work. A training session was scheduled for April 30.

An inspection along the right-of-way on May 1, 2001 by the CPUC Environmental Monitor, revealed that the excavated hole at location No. 20 (approximately 120 yards north of Neal Road/Skyway intersection along the Paradise Memorial Trailway) was not adequately covered (see photo log). There was an open gap of about 1.5 feet by 3.0 feet between the ground and the plywood that had been placed over the hole. There were no PG&E Co. personnel in the area monitoring the situation. A call was immediately placed from the field to Steve Stielstra of PG&E Co. informing him of the potentially dangerous situation. The following day Mr. Stielstra informed Aspen that the situation had been corrected and that the hole had been secured.

**Paradise Substation Upgrades**

Substation work will be limited in scope and intermittent until the middle of May. The crew will be demobilizing in May and returning in August. Crews will be small and range from 2 to 6 workers.

**MITIGATION HIGHLIGHTS**

Although not required by specific mitigation measures, several signs have been posted along the power line route to inform construction workers of project requirements. These signs include: signs posted at the substation to identify approved parking areas; “No Project Access” signs on both sides of each tributary to Nance Creek where it crosses the right-of-way. In addition, the power line crew has minimized project traffic and congestion along the Paradise Memorial trailway by limiting the number of vehicles parked on-site. Workers have been parking at the
PG&E Co. facility on Elliot Road and carpooling to the trailway. Dump truck trips have been scheduled to minimize the number of trips required to remove the excavation spoil.

**Mitigation Measure IV-1.** Because PG&E Co. plans to remove vegetation during the nesting period of March 1 and July 31, PG&E Co.’s biologist surveyed for nesting birds on April 18 and 19 and during the first portion of the week of April 30. The nesting bird surveys were completed from the Paradise Substation to pole 5/58 (where the line leaves Neal Road). Trees marked for trimming or removal and trees adjacent to the trees marked for trimming or removal were surveyed and no nesting birds were identified. PG&E Co.’s biologist and PG&E Co.’s clearing supervisor are working closely to ensure that work only occurs in areas that have been surveyed for nesting birds. If more vegetation removal is necessary in areas that have not been recently surveyed for nesting birds, such surveys will be completed. If nesting birds are found, appropriate measures will be implemented to minimize impacts to them.

**Applicant Proposed Measure MM 4-2.** The CPUC Environmental Monitor noted that the gravel that has been deposited at the staging area along Neal Road is significantly limiting fugitive dust during dry and windy conditions.

**Applicant Proposed Measure 5-9.** Caution tape installed around the elderberries is continually being torn down by non-project related people. Each time the tape around the elderberries has been discovered to have been torn down, it has been promptly replaced by the project’s Environmental Inspector.

Restoration contractor crews have been shown the specific location of the elderberries and appropriate protective measures (e.g. avoidance) was discussed, as on previous occasions with other workers. In addition to continuous maintenance of the caution tape, all crews currently working on the project have been taken to the site and given training regarding the mitigation measures applicable to the elderberry plants. Because of the repeated removal of the exclusion flagging around the elderberry, PG&E Co. recommends leaving it down if it is removed again, and then re-installing it before the pole and line work.

The vegetation clearing crew has respected the buffer zone around the elderberry plants while trimming trees located to the north of the restricted area during the week of April 23. This was accomplished by tying off tree branches to insure that they did not fall near the elderberry plants.

**Applicant Proposed Measures 14-5.** While working along the Paradise Memorial Trailway, crews have been making a diligent effort to keep the path clean and open to the public. Leaf blowers have been used to keep the path free of wood chips and brooms are used to clean off any dirt or mud. This has been a continuous effort that occurs throughout the day. In addition to signs indicating tree-trimming ahead, a PG&E Co. representative has been on-site to escort the public through the area to ensure their safety and inform them that the path would remain open during clearing operations.

**Mitigation Measure XIII-1.** Trailway pavement damage has been minimized by walking the auger along the side of the trailway, straddling the auger over the trailway, and crossing the paved surface on 1 ¾ inch plywood. While waiting for auger repairs, the power line crew has spent a significant amount of time maintaining the Trailway, including cleaning the path, patching cracks in the asphalt surface, and repairing ruts in the soil between the Trailway path and the edge of the right-of-way.

May, 2001
ADDITIONAL NOTES AND ISSUES

PG&E Co.’s Environmental Monitor noted the following items along the Paradise Memorial Trailway that were not associated with Paradise Area Reinforcement Project:

- Four small trees (3-4” in diameter) on the north side of the Trailway between Elliot and Pearson Roads have been recently cut.
- Soil was shoveled onto the Trailway adjacent to pole 0/5. The power line crew swept the soil off the path.
- A pile of mulch was noted on the north side of the Trailway, south of Foster Road.
- Pine branches were noted on the south side of the Trailway between poles 0/17 and 0/18.

These issues are non-project related, but were noted within the project’s right-of-way.

MEASURES COMPLETED TO DATE

MM 5-3: Preparation of Amphibian Habitat Assessment
MM 5-8: Survey for pallid bat roosts
MM 5-5: Preparation of Vegetation Management, Erosion Control and Restoration Plan
MM 6-4, V-2, and MM 5-10: Surveys for laydown area on Neal Road
V-1: Cultural Resources Training for Project Workers
MM 9-2: Hazardous Substances and Control Training for Project Workers

PROJECT MEMORANDUMS AND NON-COMPLIANCE REPORTS

No Project Memorandums or Non-Compliance Reports were issued during the period of April 1 to May 1.

Attachments:

A. Photos documenting the 5/1/01 site inspection
B. PG&E Co.’s Paradise Mitigation Database Table (updated Friday, April 27, 2001).

cc: S. Lee; File (1224)

Key to Photos

Photo 1: Existing southern tap line (Table Mountain-Butte #3 115kV) facing east from Neal Road.

Photo 2: Project staging area located on the east side of Neal Road, facing north.

Photo 3: Project staging area, facing east.

Photo 4: Photo was taken from the corner of Neal Road and Skyway facing north (northbound Skyway is to the left of the photo.)
Photo 5: Track mounted auger with detached auger bit facing south, towards Neal Road/Skyway intersection.

Photo 6: Partially covered hole at pole location No. 20.

Photo 7: Partially covered hole at pole location No. 20.

Photo 8: Pole location No. 20, facing northwest, about 120 yards north of Neal Road/Skyway intersection.

Photo 9: Facing north along the Paradise Memorial Trailway. “Rounds” left by the tree clearing crew.

Photo 10: Traffic road block associated with project vegetation clearing activities, facing south on Neal Road.

Photo 11: Tree trimming and removal operations along Neal Road.

Photo 12: Tree trimming and removal operations along Neal Road. Workers handling downed distribution line.

Photo 13: Tree trimming and removal operations along Neal Road, facing west.

Photo 14: Tree trimming and removal operations along Neal Road, facing north.

Photo 15: Tree trimming worker in tree, west of Neal Road.

Photo 16: Tree chipper, on west side of Neal Road.
## PG&E Co.'s Paradise Mitigation Database

<table>
<thead>
<tr>
<th>Timing of Action:</th>
<th>Mitigation Measure</th>
<th>Implementation Actions</th>
<th>Monitoring Requirements</th>
<th>Status</th>
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<tbody>
<tr>
<td>Pre-construction</td>
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### Topic: Air Quality

**MM 4-1:**

All personnel working on the project will be trained prior to starting work on methods for minimizing air quality impacts during construction.

- PG&E to provide training and document (agenda and list of attendees) to CPUC
- CPUC to review documentation
- Attendee sign-in lists will be submitted to the CPUC on a regular basis throughout construction. This mitigation measure is on-going.

**MM 4-3:**

Although short-term construction vehicle emissions are minimal relative to the ambient emission levels and would not result in significant impacts, the following measures will be incorporated into the project to reduce emissions during construction activities:

- Carpooling will be encouraged among construction workers through contractor bid specifications and project orientation training for workers.
- Vehicles used in construction activities will be tuned per the manufacturers' recommended maintenance.
- Vehicle idling time will be minimized.

- PG&E to document in letter to CPUC
- CPUC to review letter
- PG&E's training program encourages workers to carpool to the project site and minimize vehicle idling time. Attendee sign-in lists will be submitted to the CPUC on a regular basis throughout construction. This mitigation measure is on-going.

### Topic: Biological Resources

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* Mitigation Measure has been completed.

*Updated*  *Friday, April 27, 2001*
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<td>Pre-construction</td>
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<td>PG&amp;E shall comply with all terms</td>
<td>CPUC Environmental Monitor site visit to verify compliance.</td>
<td>A 20-foot buffer zone has been established. PG&amp;E has copied CPUC the letters sent to the USFWS documenting the protocol for protecting elderberry plants. Due to reoccurring vandalism of the ribbon marking the buffer zone, the ribbon has been left down. Single lath and flagging have been installed at each end of the buffer zone to establish a less conspicuous visual boundary. The ribbon around the perimeter of the buffer zone will be reinstalled as new crews move into the area.</td>
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</table>

**Topic:** Biological Resources

PG&E will comply with Endangered Species Act requirements for mitigating impacts to valley elderberry longhorn beetle. PG&E will avoid and protect the habitat whenever possible in the "core" and "buffer zones." The core area is within 20 feet of the dripline of any elderberry plants; the buffer zone is within 100 feet of any elderberry plant. Protective measures to be followed are:

--- Fence and flag all areas to be avoided. Provide a minimum construction setback of at least 20 feet from the dripline of each elderberry plant and a minimum setback from vegetation clearing of 100 feet from any elderberry plant.

--- Brief all workers on the need to avoid damaging the elderberry plants and the possible penalties for not complying with these requirements.

--- Put up signs identifying the location of the habitat to be avoided.

--- Restore damage done, including providing erosion control and revegetating with appropriate native species.

--- No pesticides or fertilizers should be used in the core and buffer areas.

Where it is not possible to avoid elderberry plants, they shall be transplanted if they are likely to survive the transplant effort. For every elderberry stem that is 1.0" or greater in diameter at ground level that is adversely affected, mitigation acceptable to the USFWS will be developed. All necessary permits will be obtained, in consultation with USFWS.

* Mitigation Measure has been completed.

*Updated* Friday, April 27, 2001
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**Topic:** Biological Resources

**MM 5-1:**

PG&E will provide a qualified botanist to survey the proposed power line in Butte County for special-status plants that bloom in April or May and that may occur in the project area. Based on the presence of suitable habitat, these species include Butte County fritillary (*Fritillaria eastwoodiae*), Red Bluff dwarf rush (*Juncus leiospermus var. leiospermus*) and veiny monardella (*Monardella douglasii ssp. venosa*). A survey is not required in the Town of Paradise because no suitable habitat for these species is found in the Town of Paradise limits along the power line route.

If any of these or any other special-status species are found in the power line route, PG&E will ensure avoidance of these populations through one or more of the following techniques:

-- Relocating power poles or laydown areas
-- Careful removal of canopy trees
-- Temporary construction fencing
-- Construction worker training and construction monitoring by a qualified botanist

The method(s) used to avoid populations of special-status plants will be proposed by PG&E Technical and Ecological Services and approved by the California Department of Fish and Game prior to implementation. If populations of special-status plants cannot be avoided, PG&E will modify the project to minimize impacts to special-status plants. In addition, PG&E will design and conduct mitigation for direct impacts to special-status plants in proportion to the status and rarity of the species and the magnitude of the impact. Such mitigation will be approved prior to implementation by the CDFG and the CNPS.

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* Mitigation Measure has been completed.

**Updated**  Friday, April 27, 2001
### Timing of Action:

#### Pre-construction

<table>
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| **MM 5-8:**  
To reduce the chance of affecting pallid bat roosts during winter hibernation or during reproduction, if hollow trees are to be removed, they will be inspected first to insure that no bat roosts are present. Removal of a tree that provides roosting cover will be delayed until the tree can be removed without impacts to pallid bats. Trees containing bats will not be removed until they are unoccupied.  
PG&E shall inspect trees for bats  
CPUC Environmental Monitor to verify inspections; | * PG&E’s biological consultant surveyed trees along the project route for potential pallid bat roosts prior to tree clearing operations and a protocol was developed for removing potential bat roosting trees and ensuring that the trees were unoccupied. Seven potential bat roosting trees were removed on 2/27/01 and 2/28/01 in accordance with the protocol. No evidence of bats was noted during this operation. This mitigation measure has been completed. |

| **MM 5-7:**  
To mitigate loss of biological diversity and to prevent the further spread of French broom on the Paradise Memorial Trailway, PG&E will develop a vegetation management plan in consultation with the Town of Paradise to reduce the amount of this noxious weed present.  
PG&E to submit vegetation management plan to CPUC & Town of Paradise  
CPUC to review report; | * This mitigation measure has been completed. |

| **MM 5-3:**  
In order to assess the impacts on special-status amphibians, habitat assessments will be conducted prior to construction activities. Due to the seasonal nature of the water courses, habitat assessments and surveys should be completed immediately prior to construction activities rather than during a previous year or alternate season to best assess true impacts or a species. Based on the results of the initial habitat assessments, species-specific surveys may be completed. In any case and regardless of the results of the surveys, impacts to any identified special-status species will be avoided or at least minimized to a level of no significance by implementing the mitigation procedures described below.  
PG&E to perform surveys and document findings in a letter to CPUC  
CPUC to review report; | Habitat assessments and surveys completed 4/12/00 and a report was submitted to the CPUC on 1/5/01. To date PG&E has avoided crossing the drainages and has planned construction access to avoid crossing the drainages throughout all stages of construction. If crossings are later determined to be necessary, surveys will be conducted and a letter report will be submitted to the CPUC. |

* Mitigation Measure has been completed.

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<tr>
<td><strong>Pre-construction</strong></td>
<td><strong>Biological Resources</strong></td>
<td>PG&amp;E to submit letter report documenting removal timing</td>
<td>CPUC to review report</td>
<td>PG&amp;E's biologist conducted nesting bird surveys during the week of April 23 for trees that need to be trimmed or removed between the substation and Neal Road. Additional surveys will be completed during the week of April 30 for trees that need to be trimmed or removed south of Neal Road. PG&amp;E's biologist is coordinating with PG&amp;E's clearing supervisor to ensure that surveys are complete and no nesting birds are present prior to any clearing work.</td>
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<td>MM 5-6: (pre-con)</td>
<td>To prevent destruction of active nests of bird species that are either special-status or protected by the Migratory Bird Treaty Act, all trees and shrubs should be removed outside the nesting season (i.e., vegetation removal for the project should take place between August and February).</td>
<td>PG&amp;E to survey wood poles and document findings in a letter to CPUC</td>
<td>CPUC Environmental Monitor to verify surveys; CPUC to review documentation</td>
<td>Surveys for nest cavities within poles will be conducted immediately prior to pole removal and the results of the surveys will be provided to the CPUC. No poles are scheduled for removal until August, 2001.</td>
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| MM 5-2:                | If construction of the proposed project occurs outside the nesting season for special-status birds or birds protected by the Migratory Bird Treaty Act (i.e., if construction does not occur between March and July), no pre-construction mitigation will be required. If construction takes place during the nesting season for any of the species listed in Table 5-6 or for species protected under the Migratory Bird Treaty Act, pre-construction surveys should be conducted in late winter (February-March) to locate nests that could be destroyed during construction. These nests should be avoided, if possible. If they cannot be avoided nests should be removed before the adults return and begin reproduction. The wooden poles along Segments 4 and 5 that would be removed should be surveyed at the same time for evidence of cavities used by cavity nesting birds. Any cavities should be inspected thoroughly to insure that they harbor no wildlife. If a cavity is empty, it should be covered with sheet metal to prevent nesting. The wooden poles should be inspected shortly before removal to determine whether a cavity used by nesting birds is present at the time of construction (despite precautions taken). If a nest is present, the pole should be left in place until nesting is complete, if possible. If this is not possible, the section of pole containing the cavity should be mounted at a similar height on a pole set nearby. | | |

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**MM 5-10:**

Should construction activity become necessary outside of the biological resources survey area identified above (Section 5.1), any affected areas will be surveyed by a qualified biologist prior to initiating the activity in order to ensure that no special-status biological resources will be impacted.  

- **Implementation Actions:** PG&E shall complete surveys and submit letter report to CPUC  
- **Monitoring Requirements:** CPUC to review report  
- **Status:** Surveys will be scheduled and performed if additional workspace needs, if any, are identified. A report will be provided to CPUC documenting these surveys and avoidance of project impacts.

**MM 5-11:**

To avoid further disturbance to riparian vegetation along Segment 3, maintenance access to the proposed 115kV power line and the existing 60kV power line will be from Neal Road and Skyline Boulevard but will not cross Nance Creek between the two access points except in emergencies. Vehicles will cross tributaries to Nance Creek only in areas devoid of vegetation.  

- **Implementation Actions:** PG&E to submit letter describing maintenance access proposal  
- **Monitoring Requirements:** CPUC to review letter  
- **Status:** The project only crosses tributaries to Nance Creek. PG&E construction and maintenance vehicles will cross these drainages at well-defined locations on the existing dirt access road. These access crossings areas are essentially devoid of riparian vegetation. This mitigation measure was addressed in a letter to the CPUC on 1/11/01.

**MM 5-5:**

To reduce the chance of spreading or introducing noxious plants in the project area, PG&E will ensure that all construction vehicles are thoroughly washed prior to entering wildlands (i.e., prior to going off-road). In the growing season after construction, a qualified biologist will survey the power line corridor for new infestations of yellow star thistle or substantial new infestations of any other noxious weeds, including those listed in Table 5-2. If such infestation are found, PG&E will eradicate them using proven methods such as herbicides or biological control agents. PG&E will coordinate these efforts with the Butte County Department of Agriculture.  

- **Implementation Actions:** PG&E to survey for Thistle, and document subsequent actions in a letter  
- **Monitoring Requirements:** CPUC to review report  
- **Status:** The Vegetation Management, Erosion Control and Restoration Plan identifies equipment/vehicle cleaning procedures. This plan identifies PG&E’s approach to weed management on the project. The plan was provided to the CPUC on 1/24/01. The pre-construction component of this mitigation measure has been completed.

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* Mitigation Measure has been completed.
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<th>Topic: Cultural and Historic Resources</th>
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### MM 6-4: (pre-con)

Should ground disturbing activity become necessary outside of the cultural resources survey area identified above (Section 6.1), any affected areas will be surveyed by PG&E's Cultural Resources Specialist and CPUC's Environmental Monitor prior to initiating the activity in order to ensure that no cultural resources sites will be impacted.

NOTE: Measure has been modified since PG&E submitted its PEA to the CPUC in January, 2000.

### MM 6-1:

The train depot and immediate vicinity shall be spanned by the power line if practicable to avoid potential indirect impacts to this structure.

### V-2: (pre-con)

In the event that PG&E needs to use land in undisturbed areas that it does not own for laydown or staging areas off the power line ROW, PG&E will be required to conduct all required surveys with appropriate mitigation consistent with the applicant proposed measures listed in Table B-1 of the Initial Study to reduce all impacts associated with development of the laydown or staging area to non-significant levels. Survey reports and proposed mitigation actions shall be submitted to the CPUC for review and approval. The site may not be used by PG&E until PG&E has demonstrated to the CPUC that its action will reduce all potential impacts to a level that would be less than significant.

### MM 6-2:

Prior to construction, all construction personnel will receive environmental training. Training will emphasize the importance of the cultural resource sites in the vicinity and discuss the possibility that previously unidentified cultural resources may become apparent during ground-disturbing activities, and how to respond if they are discovered.

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<td>Pre-construction</td>
<td>Cultural and Historic Resources</td>
<td>V-1: (pre-con) If previously unidentified cultural materials and/or features are discovered during construction, all work in the immediate area will cease, and PG&amp;E’s Cultural Resources Specialist and CPUC’s Environmental Monitor will be immediately contacted for identification and evaluation. In accordance with Article 5, Section 15064.5.f. of the CEQA Guidelines, the specialist shall prepare a site-specific mitigation plan if the materials and/or features are determined to be significant and cannot be avoided. The mitigation plan shall be subject to review and approval by local, State, and Federal agencies before any archaeological mitigation construction begins. If human remains are encountered, PG&amp;E’s Cultural Resources Specialist and the County Coroner will be contacted for identification and appropriate measures will be undertaken in accordance with Article 5, Section 15064.5.e of the CEQA Guidelines.</td>
<td>PG&amp;E to provide training and document (with agenda and list of attendees) to CPUC</td>
<td>CPUC to review documentation; CPUC Environmental Monitor site visit to verify compliance.</td>
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<td>XIII-1: PG&amp;E shall submit a report to the Town of Paradise which describes plans to accomplish the Town of Paradise’s objectives to preserve the integrity and strength of the surface of the Memorial Trailway. The report shall be submitted to the Town of Paradise Public Works Department and the CPUC at least 30 days prior to the planned construction start date. Construction will not be allowed to commence along Segment 5 until the CPUC is satisfied that PG&amp;E has addressed the concerns of the Town of Paradise regarding the trailway surface. A conclusion of project construction, the CPUC mitigation monitor will verify that all construction damage to the surface has been professionally repaired.</td>
<td>PG&amp;E to provide report to the Town of Paradise and the CPUC</td>
<td>CPUC to review and approve PG&amp;E’s report.</td>
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Updated  Friday, April 27, 2001
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<td>MM 6-3: (pre-con)</td>
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If previously unidentified cultural materials and/or features are discovered during construction, all work in the immediate area will cease, and PG&E’s Cultural Resources Specialist and CPUC’s Environmental Monitor will be immediately contacted for identification and evaluation. In accordance with Article 5, Section 15064.5.f. of the CEQA Guidelines, the specialist will determine appropriate mitigation measures if the materials and/or features are determined to be significant and cannot be avoided. If human remains are encountered, PG&E’s Cultural Resources Specialist and the County Coroner will be contacted for identification and appropriate measures will be undertaken in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) and Article 5, Section 16054.5.e of the CEQA Guidelines.

*(NOTE: Measure has been modified since PG&E submitted its PEA to the CPUC in January, 2000.)*

### Topic: Geology and Soils

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A geologist or geotechnical engineer will evaluate slope stability and assist in selection of power line pole locations in steep slope areas to eliminate or minimize potential impacts from landslides, rock falls, or other slope instability. All poles will conform with the structural requirements of the CPUC’s General Order 95.

### Topic: Hydrology and Water Quality

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<td>Topic: Hydrology and Water Quality</td>
<td>PG&amp;E will prepare an erosion and sediment transport control plan that will be submitted to Butte County and the Town of Paradise along with the grading permit application. This plan will follow the standards in the Manual of Erosion and Sedimentation Control Measures (ABAG 1981), and practices recommended by the Natural Resources Conservation Service. Implementation of the plan will stabilize graded areas and waterways, and minimize erosion and sedimentation. The plan will designate Best Management Practices (BMPs) for construction. The construction crews will install erosion controls such as hay bales, water bail covers, sediment fences, sensitive area access restrictions (e.g., fencing), vehicle mats in wet areas, and retention/settlement ponds where necessary and appropriate before initiating extensive clearing and grading. Subsequent mulching, seeding, or other suitable stabilization measures will protect exposed areas during, and subsequent to, construction activities. A workers’ training program will be established to communicate environmental concerns and appropriate work practices to all field personnel. A construction monitoring program will ensure that the plans are followed throughout construction.</td>
<td>PG&amp;E to submit plan and conduct training (documented by submittal of agenda and attendee list)</td>
<td>CPUC, Butte County, Town of Paradise to review plan; CPUC Environmental Monitor site visit to verify compliance</td>
<td>Clearing activities are not expected to generate extensive soil disturbance due to the limited use of equipment and focused activities at pole locations. Erosion control has been addressed in the environmental training program. A copy of the training materials was provided to the CPUC in the 1/11/01 submittal. The Erosion Control Plan was submitted to the CPUC in the 12/22/00 package. The pre-construction component of this requirement has been completed.</td>
</tr>
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</table>

* Mitigation Measure has been completed.

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## Timing of Action:
**Pre-construction**

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<tr>
<td><strong>Topic:</strong> Hydrology and Water Quality</td>
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<tr>
<td>MM 9-2:</td>
<td>PG&amp;E to submit plan and conduct training (documented by submittal of agenda and attendee list)</td>
<td>CPUC, Butte County, Town of Paradise to review plan; CPUC Environmental Monitor site visit to verify compliance</td>
<td>PG&amp;E has incorporated hazardous substance control and clean-up requirements into the project's training materials. A copy of these training materials was provided to the CPUC in the 1/24/01 submittal. PG&amp;E's Environmental Inspector will ensure implementation of these protective measures during site inspections. The pre-construction component of this mitigation measure has been completed.</td>
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<td>PG&amp;E will prepare a Hazardous Substance Control and Emergency Response Plan that will include preparations for quick and safe cleanup of accidental spills. This plan will be submitted with the grading permit application. The plan will prescribe procedures for reducing the potential for significant impacts to surface and ground water in the unlikely event of an oil spill, prescribe methods for safe collection and disposal of hazardous substances generated during construction activities, and include an emergency response program to ensure quick and safe cleanup of accidental chemical spills. The plan will identify areas where refueling and vehicle maintenance activities, temporary storage of unused concrete, and storage of hazardous materials will be permitted. A workers' education program will be established for all field personnel prior to initiating fieldwork to provide training in appropriate spill response methods. A monitoring program will be established to ensure that the plans are followed. The existing SPCC containment system will be used at the substation to retain a release in the extremely unlikely event of a catastrophic failure of oil-filled electrical equipment during equipment removal, installation, or operation. Additionally, oil-absorbent material, tarps, and storage drums may be used to contain and control any minor releases. Excess water and liquid concrete that escapes the pole foundation pours will be directed to bermed areas adjacent to the borings where the water will infiltrate or evaporate and the concrete will remain and begin to set. Once the excess concrete has been allowed to set up (but before it is dry), it will be removed and recycled or transported to an approved landfill for disposal.</td>
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<td>MM 9-4:</td>
<td>PG&amp;E to submit Plan to CPUC and Butte County</td>
<td>CPUC and Butte County to review plan</td>
<td>PG&amp;E is in the process of revising the SPCC to reflect the new transformer that will be installed at the substation. The existing engineered containment structures will continue to be used to contain and control any oil release.</td>
</tr>
<tr>
<td>PG&amp;E will revise their Spill Prevention, Countermeasure, and Control (SPCC) plan for the Paradise Substation in response to alterations due to the proposed project. The plans will include engineered methods for containing and controlling any oil release (e.g., retention pond, mote, berms, or some combination), and preparations for a quick and safe cleanup. The plan will be submitted to Butte County for review.</td>
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* Mitigation Measure has been completed.
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<tr>
<td><strong>Topic:</strong> Land Use</td>
<td><strong>MM 10-1:</strong> Prior to construction, PG&amp;E will notify landowners immediately adjacent to proposed construction about construction activities. The notice will contain information about the timing and nature of the activities. A PG&amp;E contact person will be designated and a telephone number and address provided to the notified parties to allow them to obtain information and comment about project construction.</td>
<td>PG&amp;E to provide CPUC with a copy of the advanced notice for review and approval. PG&amp;E shall also provide the CPUC with documentation of mailing a 72-hour advance notice to all businesses and residents and document attempts in person or telephone follow up.</td>
<td>CPUC to review notice</td>
<td>* Initial notification information provided to the Town and adjacent property owners and businesses. Copies of this notification were provided to the CPUC on 12/22/00. This mitigation measure has been completed.</td>
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**Topic:** Noise

| **MM 11-8:** | To achieve lower nighttime noise, the new transformer may be operated at reduced loading and without fan cooling between the hours of 10:00PM and 7:00AM. | PG&E to implement as defined | Environmental Monitor site visit to verify compliance | * No pre-construction actions are required. |
| **MM 11-7:** | Design specifications for the proposed transformers must meet or exceed 45 MVA, 115/12kV transformers will meet 69 dBA, OA rating and 72 dBA, FA rating. | PG&E to implement as defined | Environmental Monitor site visit to verify compliance | * These design requirements have been met. This mitigation measure has been completed. |

**Topic:** Public Health and Safety

| **MM 12-4:** | PG&E shall update the Hazardous Material Business Plan and SPCC Plan as needed, and will employ proper use, storage and disposal methods for hazardous materials and wastes. (See MM 9-2 for additional hazardous waste mitigation efforts.) | PG&E to provide submit Plan for CPUC review | CPUC to review plan | PG&E is in the process of revising the SPCC to reflect the new transformer that will be installed at the substation. The existing engineered containment structures were previously enlarged and will continue to be used to contain and control any oil release. |

**Topic:** Transportation and Traffic

* Mitigation Measure has been completed.

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### Timing of Action:

**Pre-construction**

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#### Mitigation Measure

**MM 14-1:** (pre-con)

Construction activities shall occur on road shoulders or in non-traffic lanes, where feasible, to avoid unnecessary lane closures.

Coordination shall occur between PG&E and the Butte County and Town of Paradise Departments of Public Works to minimize conflicts with the design, location, and construction of other projects.

PG&E shall notify Town of Paradise and Butte County residents of scheduled lane closures.

PG&E shall use traffic control personnel during lane closures. Standard traffic control techniques will include flagmen, warning signs, cones, and lights.

**Implementation Actions**

- PG&E to implement as defined; provide CPUC documentation of coordination with local agencies

**Monitoring Requirements**

- Environmental Monitor site visit to verify compliance; CPUC to review coordination documentation

**Status**

PG&E continues to coordinate with Butte County and the Town of Paradise regarding lane closures and work on road shoulders. A copy of the encroachment permits was submitted to the CPUC on 3/8/01 as documentation of the coordination with the Town and Butte County. Notification of lane closures was made in the public notice sent to the CPUC on 12/22/00.

**MM 14-5:**

PG&E will notify Town of Paradise residents of scheduled lane closures.

Signs will be placed at the main trailway crossroad points (Neal Road, Foster Road, Fir Road, and Elliot Road) notifying Trailway users of trail closures.

**Implementation Actions**

- PG&E to implement as defined; provide CPUC documentation that residents were notified

**Monitoring Requirements**

- Environmental Monitor site visit to verify compliance; provide CPUC documentation that residents were notified

**Status**

PG&E continues to coordinate with Butte County and the Town of Paradise regarding lane closures and work on road shoulders. A copy of the encroachment permits was submitted to the CPUC on 3/8/01 as documentation of the coordination with the Town and Butte County. Notification of lane closures was made in the public notice sent to the CPUC on 12/22/00.

**MM 14-4:** (pre-con)

--The Butte County Transportation Authority shall be notified of lane closures that will potentially affect bus stops in the project area.

--The Paradise Unified School District and the Town of Paradise shall be notified of lane closures that will potentially affect bus stops in the project area.

**Implementation Actions**

- PG&E to implement as defined; provide CPUC documentation of coordination with local agencies

**Monitoring Requirements**

- Environmental Monitor site visit to verify compliance; CPUC to review coordination documentation

**Status**

PG&E will continue to coordinate with Butte County and the Paradise Unified School District and the Town of Paradise regarding lane closures that could potentially affect bus stops in the project area. PG&E has obtained lane closure permits for clearing activities.

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* Mitigation Measure has been completed.

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<td>MM 7-1: (pre-con)</td>
<td>PG&amp;E to comply with stated requirements</td>
<td>CPUC to review documentation; CPUC Environmental Monitor site visit to verify compliance.</td>
<td>* Surveys complete. U.S.A notifications will be made and documented by crew foremen during construction. This mitigation measure has been completed.</td>
</tr>
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</table>

**Mitigation Measure**

Mitigation measures will ensure that impacts to other utilities will be less than significant:

--PG&E will conduct surveys prior to construction to locate underground and overhead utilities.
--All utilities near project facilities will be put on the construction plan maps.
--During construction, before any ground disturbance occurs, Underground Service Alert (USIA) will be contacted to verify the location of existing underground utilities.
--Representatives from non-PG&E utilities will be notified in advance of construction if construction will be occurring near their lines, and PG&E will coordinate with them.
--PG&E will locate poles and string conductors at a safe distance from intersecting and adjacent power line structures, conductors, and telephone wires in accordance with the distances specified in the CPUC General Order No. 95.

**Topic: Visual Resources**

MM 15-5:

To minimize the need for excessive vegetation clearing from the power line right-of-way, PG&E will prepare a detailed power line clearing plan for power line Segment 5 (along the Paradise Memorial Trailway) and power line Segment 4 (along Skyway) in consultation with the Town of Paradise that takes into account:

--Basic principles of feathering and scalloping the power line easement.
--Pruning ponderosa and foothill pine trees where possible along the sides of the power line easement rather than removing them.
--Retaining lower vegetation under power line conductors based on current clearance guidelines.

Prior to clearing activities, PG&E will identify and tag in the field those trees and major shrubs (taller than 10 feet) to be removed, trees to be pruned, and trees to remain within the power line easement. PG&E shall continue to coordinate with and seek input from the Town of Paradise, Butte County, and the Paradise Fire Department.

(NOTE: Measure has been modified since PG&E submitted its PEA to the CPUC in January, 2000.)

* Mitigation Measure has been completed.

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<td>Pre-construction</td>
<td>MM 15-3: (pre-con)</td>
<td>PG&amp;E to implement as defined</td>
<td>Environmental Monitor site visit to verify compliance</td>
<td>PG&amp;E has prepared a revegetation plan which specifies planting materials, methods, and schedules for installing native trees and shrubs along the Paradise Memorial Trailway. The pre-construction component of this mitigation measure has been completed.</td>
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<td>To reduce the perceived scale of power poles, to compensate for the loss of shade, and to mitigate for the loss of privacy to adjacent residences along the paved portions of the Paradise Memorial Trailway, PG&amp;E will:</td>
<td>--Prior to project construction, prepare revegetation planting plans and specifications in coordination with the Town of Paradise. Emphasize design goals of using native shrubs of sufficient height to screen the trail user from adjacent land uses; provide low trees that could be easily maintained to reflect power line maintenance and fire management guidelines yet also provide shade on the trail; and screen the base of the power line poles as seen from the trail. --During the first spring after project construction, implement revegetation designs. Maintain plants, until re-established, for a two-year establishment period.</td>
<td>(NOTE: Measure has been modified since PG&amp;E submitted its PEA to the CPUC in January, 2000.)</td>
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MM 15-1: (pre-con)  
To reduce the potential for reflection of sunlight from project facilities, reduce color contrasts, and visually unify the project with the surrounding characteristic landscape, PG&E will:  
--Throughout the project area, though not standard practice, use only non-specular conductors that do not reflect sunlight.  
--As seen from the Paradise Memorial Trailway and Skyway, use self-weathering steel poles. Self-weathering steel poles will oxidize over time thereby reducing reflection and color contrasts.  
PG&E to implement as defined | Environmental Monitor site visit to verify compliance | The mitigation requirements has been incorporated into project plans and designs. The pre-construction component of this requirement has been completed. |

MM 15-2:  
To reduce the number of power line poles along the Paradise Memorial Trailway, PG&E will coordinate the placement of poles to accommodate existing service lines as much as possible.  
PG&E to implement as defined; provide CPUC documentation that PG&E coordinated with other utilities | Environmental Monitor site visit to verify compliance; provide CPUC documentation that residents were notified | This requirement has been incorporated into the project's design. The pre-construction component of this mitigation measure has been completed. |

* Mitigation Measure has been completed.

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