PROJECT MEMORANDUM
PARADISE AREA REINFORCEMENT PROJECT

To: Beth Shipley, CPUC
From: Matt Fagundes, Deputy Project Manager
Date: March 26, 2001
Re: Mitigation Monitoring Report: January 2 – March 8, 2001

The following descriptions of compliance and monitoring activities for the Paradise Area Reinforcement Project were supplied to Aspen Environmental Group by Steve Stielstra, Senior Land Projects Analyst for PG&E Co. on March 8, 2001.

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 will be updated with each status report, with completed items moved to the end of the table. This report represents all activities from the beginning of construction on January 2, 2001 to March 8, 2001. Upcoming submittals will provide a status summary for only the most recent activity period.

Construction on the Paradise Area Reinforcement Project began on January 2, 2001 with a small crew working at the Paradise Substation. Work at the substation has been intermittent. The vegetation clearing crew mobilized on January 8, 2001 and has completed the majority of the tree trimming and removal required for the project. The crew has demobilized, but will return towards the end of March 2001 to trim or remove trees on private properties where PG&E Co. is acquiring easement rights that should be in-place by that time. The power line crew started augering holes for the pole foundations on February 21 and anticipates that they will complete the foundations during May 2001.

Work scheduled for the next few weeks will be less intensive than the work to date. The power line crew will continue to auger holes at an approximate rate of two holes a day, on a four day work week. Substation work will be minimal.

CONSTRUCTION ACTIVITIES

Vegetation Clearing. Vegetation clearing has been underway since January 8, 2001 with a small crew of 8 workers and a foreman. A PG&E Co. forester has also been on-site during the entire vegetation clearing process acting as both a technical advisor and public relations representative. The clearing crew used hand tools, and a chipper pulled with a one-ton flatbed, stake-side truck. Trees have been trimmed or felled, and the limbs and smaller diameter trunk sections have been hand carried to the chipper. Larger trunk rounds have been hauled off-site. No heavy tree removal equipment such as skidders have been used. Before leaving each work site along paved roads and the Paradise Memorial Trailway, the roads and trail areas were cleared of debris, and paved surfaces blown clean. As a result, there has been very little ground disturbance or evidence on the trail or roads of activity from this crew after they leave the area.
Most of the vegetation removal was completed by March 2, 2001. There are still about two weeks of vegetation clearing that cannot occur until additional private property rights are obtained. This work should be complete by the end of March.

PG&E Co. has completed Broom (a shrub with high fire hazard) removal along the Paradise Memorial Trailway. Broom was removed (cut at ground level) and taken to an approved disposal site. Wood chips produced from vegetative clearing between the substation and Skyway were used as mulch over the areas where Broom was removed, as discussed with the Town of Paradise. Approximately 70 percent of the Broom within the right-of-way was removed.

During activities along the Trailway, construction crews have taken care to protect the public and to minimize disturbance to the path. This included using signs, cones, and as necessary, directing or escorting residents past the work area.

**Power Line Construction.** The PG&E Co. power line crew started work on February 21, 2001 with a four-man team that tested soil conditions and augers holes for the pole foundations. The crew started work on the unpaved section of the Paradise Memorial Trailway between Foster Road and Pearson Road, and is working towards the substation. Six holes have been drilled and covered to date. To cover the holes until the pole foundations are poured, two evenly spaced 2 by 4 inch pieces of wood are pined over the holes. Then, one-inch plywood is nailed on top of the “2 by 4’s” securing the holes. After the plywood is secured, a backhoe comes by and drops dirt along the edges of plywood to ensure that no portion of hole is accessible. These holes will remain covered until each foundation is poured.

**Paradise Substation Upgrades.** Work at the substation is ongoing and intermittent depending on the weather, equipment arrival, clearances, and other construction issues. Clearances (de energizing a line) need to be approved ahead of time by the ISO for transmission lines. As part of a previous substation upgrade (a new 60kV/115kV transformer), the Spill Prevention Control and Countermeasures (SPCC) pond was enlarged to provide spill protection for the new 115kV transformer associated with this project. Work crews are small (between 4 and 8) and parking has remained on-site. No work is scheduled from March 17 to March 31, 2001 or from May 15 to mid-August 2001.

**WORKER ENVIRONMENTAL COMPLIANCE TRAINING**

Each member working on the project has attended an environmental compliance orientation conducted by Essex, PG&E Co.’s environmental consultant. The orientation was designed to educate the workers about the sensitive environmental issues associated with the Project. Table 1 provides a list of training provided to date.

Additional environmental orientations and briefings will be provided whenever new workers start on the project.

<table>
<thead>
<tr>
<th>Date</th>
<th>Crew</th>
<th>No. Trained</th>
<th>Type of Training</th>
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<tbody>
<tr>
<td>01/02/01</td>
<td>Substation</td>
<td>3</td>
<td>Environmental Training</td>
</tr>
<tr>
<td>01/05/01</td>
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<td>3</td>
<td>Environmental Training</td>
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<td>Tree Crew</td>
<td>14</td>
<td>Environmental Training</td>
</tr>
<tr>
<td>01/21/01</td>
<td>Power line</td>
<td>6</td>
<td>Environmental Training</td>
</tr>
</tbody>
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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.

Applicant Proposed Measure 5-3. Prior to clearing, surveys for potential pallid bat roosting trees were conducted and seven potential bat roosting trees were marked. After consultations with PG&E Co.’s biologist and a bat specialist from Garcia and Associates, a procedure for cutting potential bat roost trees, without impacting roosting bats, was developed. This plan was implemented on February 27 and February 28, 2001 during a period of above normal temperatures when bats would be more mobile. Trees were re-surveyed and were monitored during removal according to the recommended procedure to ensure that roosting bats were not impacted when the trees were removed. No roosting pallid bats, or sign of them, were found during the removal of the seven trees.

Applicant Proposed Measure 14-1. A road encroachment permit was obtained for the closure of one northbound lane on Skyway to facilitate tree removal. A specialty safety contractor provided the required traffic control and signs for the duration of the lane closure.

Applicant Proposed Measure 5-5. As required by the Mitigation Monitoring Plan, PG&E Co.’s Environmental Inspector surveyed the project area for noxious weeds and identified yellow star-thistle along the entire route. Population densities were mapped and documented with approximate station numbers.

Applicant Proposed Measure 14-4. The principal of Paradise High School, which is across the Paradise Memorial Trailway from the substation, has been contacted and informed of the scope of work and the construction schedule. He stated that he would inform staff about the nature of the project.

Applicant Proposed Measure 5-9. Dick Arnold (Entomologist, Entomological Consulting Services) and Armen Keochekian (Environmental Inspector, Essex Environmental) were on-site to monitor the removal of two pines and one oak from within the buffer zone of the elderberry plants. A tailgate meeting was conducted prior to removal of the trees. The elderberry plants were examined closely before cutting and upon completion and no damage was noted.

Unknown parties have repeatedly taken down the buffer zone flagging (3-inch caution ribbon) around the elderberry plants. In addition to continuous maintenance of the flagging, all crews currently working on the project have been taken to the site and given training regarding the mitigation measures for 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 was 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.
ADDITIONAL NOTES AND ISSUES

It should be noted that California Department of Forestry (CDF) conducted fire training for new employees from February 1 to February 16, 2001 between Skyway and Neal Road, along the Paradise Reinforcement Project right-of-way. As part of this training, existing burn piles were ignited and tracked equipment was used to put out the fires. Substantial ground disturbance occurred throughout the area and multiple trips by CDF vehicles (tracked and untracked) were made through two of the tributaries to Nance Creek. None of these disturbances were associated with the Paradise Area Reinforcement Project.

PG&E Co. is currently in the process of acquiring rights to use a well-established road off of Skyway that would allow access between two tributaries to Nance Creek. The access road is approximately 50 feet east of the “Welcome to Paradise” sign on Skyway. This road has been heavily impacted by the CDF work described above. PG&E Co. would use the road in its current condition, and no upgrades to the road will be needed. With the use of this road, the project will avoid crossing the tributaries to Nance Creek.

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 January, February, or the first week of March.

List of Attachments:

A. PG&E’s Paradise Mitigation Database Table (updated Wednesday, March 7, 2001.
B. Amphibian Habitat Assessment
C. Vegetation Management, Erosion Control and Restoration Plan
D. Surveys (Cultural and Biological) for laydown area on Neal Road
E. Worker Training Handout
F. Public Construction Notice

cc: S. Lee; File (1224)
PG&E Paradise Area Reinforcement Project

PG&E is committed to protecting environmental resources and minimizing community impacts during construction along the project right-of-way, at the substation, and at related project sites.

As a member of the construction team, you play an essential role in keeping this commitment. It is your responsibility to comply with all the requirements described in this booklet and to follow any special instructions provided by the Environmental Inspector or the construction foreman.

NOTE: This handbook provides a summary, but not a complete list of all project requirements. Contact your supervisor if you need more detailed information.

When in doubt, ask before you act!

Commitment to the Community

We are committed to working in a respectful manner whether in the Town of Paradise, or outside the town limits in Butte County. The new 115-kV power line right-of-way and the Paradise substation are near residences, Paradise High School, day care centers, and businesses. PG&E expects your help to minimize the inconvenience of the project and ensure public safety.

- Be courteous to curious public and, if necessary, refer their questions to the foreman or the Environmental Inspector.
- Maintain worksite safety, including restricted access areas and environmental exclusion areas.
- Reduce traffic and parking congestion by carpooling.

Commitment to the Community (continued)

- Limit the noise associated with the project:
  - Avoid shouting and loud conversations.
  - Limit idling time of equipment.
- Keep vehicle speeds under 15 mph on the job site and unpaved access roads.
- Plan the work with the public in mind (e.g. minimize the equipment and congestion near areas of vehicular and pedestrian traffic).

Town of Paradise Memorial Trailway

The Paradise Memorial Trailway is an especially important component of the community. This walking and bicycling trail provides recreational opportunities for residents and visitors alike. PG&E is committed to minimizing impacts to the Trailway and disturbance and inconvenience to trail users.

- Remove only vegetation approved for removal.
- Keep the worksite clean and immediately remove garbage and debris.
- Respect all signs and exclusion fencing or flagging.
- Avoid impacts to the trail surface.
- Keep the paved trail clean of mud and soil.
- Ensure that detour signs remain in place to direct pedestrians and cyclists around areas of active construction. Safety is everyone’s responsibility!
Threatened Species

The Blue elderberry bush has been identified at one location within the construction corridor, along the Paradise Memorial Trailway. The shrub is the sole source of food for an insect known as the **valley elderberry longhorn beetle**. This wood-boring beetle is protected by the federal Endangered Species Act and listed by the U.S. Fish and Wildlife Service as “threatened.” It is illegal to harm threatened or endangered species or their habitat, and to do so can result in serious penalties. Our commitment is to avoid **ANY** impacts to potential beetle habitat (the elderberry bush) during construction of the project.

- Do not enter the fenced elderberry exclusion area (including a 20-foot protective buffer zone).
- Do not allow tree limbs, tools or materials to fall within the exclusion areas.

Cultural Resources

Pre-construction cultural resource surveys have been conducted to identify any cultural resources within the construction area. You can help avoid any nearby cultural resources by keeping all work within the approved right-of-way. If previously undiscovered cultural resources or human remains are found during construction:

- Stop all work in the immediate area of the find and contact your supervisor.
- **DO NOT** resume activities in the immediate vicinity of that site until cultural resource specialists have reviewed the site and PG&E’s environmental specialist has provided permission to proceed.

Water Resources

The project route crosses several drainages and small flowing streams.

- Keep sediment on the right-of-way and out of drainages and storm drains by installing erosion control structures as directed by the Environmental Inspector or the construction foreman.
- Maintain all erosion control structures regularly.
- Equipment bridges must to be installed where passage across flowing waterbodies is necessary.
- Minimize soil disturbance and grading where possible during construction to limit the areas of potential erosion.
- Keep clearing debris and trees out of drainages.

Ground Rules

- Observe all field signs and flagging
  - Stay in the approved work areas.
  - Keep out of flagged, staked or fenced sensitive areas.
  - Use only approved travel routes and parking areas.

- Do not operate equipment or vehicles on access roads in a manner that will cause disturbance outside of the approved travel corridor.

- Do not approach or harm any wildlife. Report injured, trapped, or dead animals to your supervisor or the Environmental Inspector.

- Do not litter. All trash and construction debris must be picked up immediately.
Ground Rules (continued)

- Use appropriate methods to store and prevent spillage of hazardous materials. Quickly contain and clean up spills and properly dispose of contaminated soils.

- Use caution when refueling equipment to avoid spills and overfilling.

- Prevent fires.
  - Avoid parking vehicles or equipment over brush or tall grass.
  - All vehicles and equipment must carry a fire extinguisher.
  - Limit smoking to within enclosed vehicles.

- Contain excess liquid concrete that escapes the pole foundations within the right-of-way and remove the material before it completely dries.

Key Contacts

If your supervisor or the construction foreman is not immediately available, contact one of the following PG&E project representatives:

<table>
<thead>
<tr>
<th>Name</th>
<th>Title/Position</th>
<th>Phone Numbers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steve Stielstra</td>
<td>Senior Land Projects Analyst</td>
<td>(415) 973-8229 (office)</td>
</tr>
<tr>
<td>Roxann Hall</td>
<td>Project Manager</td>
<td>(916) 939-1423 (office)</td>
</tr>
<tr>
<td>Greg Fish</td>
<td>Lead Construction Supervisor</td>
<td>(530) 757-5944 (office)</td>
</tr>
<tr>
<td>John Avilla</td>
<td>Substation Construction Supervisor</td>
<td>(916) 425-2272 (cell) (530) 573-5240 (pager)</td>
</tr>
<tr>
<td>Armen Keochekian</td>
<td>Essex Environmental Inspector</td>
<td>(650) 303-5308 (cell) (650) 726-8320 (office)</td>
</tr>
</tbody>
</table>

Essex Environmental
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Paradise Area Reinforcement Project
—Pre-construction Notification and Schedule—

**Paradise area requires new power lines and substation upgrades**

To meet the area’s power supply requirements Pacific Gas and Electric Company will begin construction in early January 2001 of a new 115,000-volt double-circuit power line and upgrade to the Paradise Substation, converting it from 60,000 volts to 115,000 volts. The location of the new power line beginning approximately two miles south of the Paradise Town limits and 2,000 feet east of Neal Road:

- proceeds northeast, parallel an existing Pacific Gas and Electric natural gas pipeline across Neal Road and parallel the west side of the road approximately 1.5 miles to the existing 60,000-volt Centerville-Table Mountain-Oroville power line;
- continues parallel to the west side of the Centerville-Table Mountain-Oroville line to Skyway; and
- follows Skyway and the Paradise Memorial Trailway (replacing the existing power line) to the Paradise Substation.

**Vegetation clearing—January through February 2001**

Vegetation clearing on the right-of-way will occur from January 8 through February 2001. The right-of-way will be cleared to maintain line clearance standards set by the California Public Utilities Commission. Tree trimming and removal will be performed according to California Department of Forestry guidelines.

**Substation upgrades & power line construction—January through July 2001**

Substation upgrade activities are scheduled to begin January 3 and continue through May 2001. The work will take place within the existing substation site. Small crews will begin reviewing pole locations in January to evaluate the soils and bedrock. Some test digging or augering of the sites may occur at this time.

Power line construction will be approximately March through July 2001. The construction will consist of excavation and installation of pole foundations, erecting the steel poles, and stringing the new power lines.

**Restoration**

Soils disturbed during construction will be immediately stabilized, and as necessary seeded with grasses. Native tree seedlings, including flowering dogwood, hazelnut, vine maple and redbud will be planted along the Paradise Memorial Trailway to provide screening and visual enhancement.

**Safety**

For safe and efficient construction, Pacific Gas and Electric Company will periodically close sections of the Paradise Memorial Trailway and roads near construction sites. For your safety and that of the workers, please follow any trail and road detour signs that may direct you around active construction areas. Please use caution when driving past road construction activities along Neal Road, Skyway, and roads that cross the Paradise Memorial Trailway.

**Contacts and Notifications**

Contact by telephone: 415.973.5530  
Mailing Address: Roxann Hall  
Pacific Gas and Electric Company
Update 12/22/00

Project Manager: Roxann Hall, 916.939.1423
Compliance Coordinator: Steve Stielstra, 415.973.8229

2730 Gateway Oaks Drive, Suite 220
Sacramento, CA 95833
Steve -

Per your request, on December 7, 2000, I conducted a cultural resources survey of the Paradise Area Reinforcement Project (Project) proposed laydown site at 3080 Neal Road. Using approximate 20 meter transect intervals, I inspected the ground surface from Neal Road east to the tree/brush line and from the underground gasline “paddle” located at the north end of the parcel “paddle” south to the fence marking the northern border of the adjacent property.

According to a record search undertaken for the Project on April 8, 1999, a portion of the 3080 Neal Road parcel had been previously surveyed for cultural resources in 1993 for the proposed Neal Road Improvement Project (Jenevein and Hamusek, 1993). This study did not result in the identification of any cultural resources within the portion of the parcel that was inspected.

During the field inspection of the parcel conducted for the current Project, it was noted that the area has been disturbed in the past by vehicle traffic, brush clearing, and perhaps bulldozing. As a result, the surface of the ground in this area has been greatly impacted. A visual inspection of the area did not result in the identification of any cultural materials.

It is recommended that use of this area for Project laydown purposes will not have any effect on cultural resource sites. However, should previously unidentified materials and/or features be discovered during Project activities, all work in the immediate area will cease, and PG&E’s Cultural Resources Specialist will be contacted for identification and evaluation. The Specialist will then determine appropriate mitigation measures should the resource be considered significant in accordance with Appendix K of CEQA.

Please feel free to contact me if you have any questions.

Reference:

Jenevein, Steve and Blossom Hamusek 1993 Archaeological Reconnaissance of the Neal Road Improvement Project, Butte County, California. Archaeological Research Program, Department of Anthropology, California State University, Chico. Report prepared for Eco-Plan International, Chico, California.
Steve:

As you requested, below are the results of the field biological review we conducted at the proposed construction laydown area at 3080 Neal Road. The proposed laydown site on the Bigelow property adjacent to Neal Road was surveyed on foot on December 8, 2000 to identify biological resources that may occur within or adjacent to the proposed construction staging area. An overview of the site and several transects were walked during the site review.

The site primarily consists of a scattered gray pine overstory and mixed shrub understory with scattered grassy openings and areas of human-caused earth disturbance. Several piles of soil and woody debris are visible on the site and past grading of portions of the site is evident. Some clearing of timber and brush would be necessary to allow for storage of materials and safe movement of vehicles and equipment.

No wetlands or waterbodies were identified within or immediately adjacent to the proposed laydown area. No vernal pools or special status species or habitats were identified during the site review. The site is essentially level and only minimal grading will likely be required at the site. The soils appear well drained and should not pose a significant problem in wet weather. In the event that tree and shrub removal activities take place after March 1, a pre-clearing survey and protection measures will be implemented for nesting species of birds protected by the federal Migratory Bird Act, as required by the Mitigated Negative Declaration mitigation measures.

Representative digital photographs were taken to provide an overview of the vegetation community and the degree of existing disturbance. Color copies of the photos are attached to this document.
### PG&E's Paradise Mitigation Database

**Timing of Action:** Pre-construction  
**Topic:** Biological Resources

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Implementation Actions</th>
<th>Monitoring Requirements</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM 5-3:</td>
<td>PG&amp;E to perform surveys and document findings in a letter to CPUC</td>
<td>CPUC to review report</td>
<td>Habitat assessments and surveys completed 4/12/00 and a report was submitted to the CPUC on 1/5/01. To date PG&amp;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.</td>
</tr>
</tbody>
</table>

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.

| MM 5-6: (pre-con) | PG&E to submit letter report documenting removal timing | CPUC to review report | PG&E will conduct appropriate pre-clearing surveys and a letter report will be prepared for submittal to the CPUC. The vegetative clearing crew was demobilized at the end of February, but there is approximately two weeks of clearing work to be completed during March. This work can not commence until property rights can be acquired. PG&E will conduct localized surveys prior to any vegetation removal occurring after March 1 and will provide CPUC with a letter report documenting the surveys and removal of the remaining trees. |

To prevent destruction of active nests of bird species that are either special-status or protecte 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).
<table>
<thead>
<tr>
<th>Timing of Action:</th>
<th>Mitigation Measure</th>
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<tbody>
<tr>
<td>Pre-construction</td>
<td></td>
<td>PG&amp;E shall inspect trees for bats</td>
<td>CPUC Environmental Monitor to verify inspections</td>
<td>PG&amp;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 and will be removed from future tables.</td>
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<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>
</tr>
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</table>

**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.

**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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<td><strong>Pre-construction</strong></td>
<td><strong>Biological Resources</strong></td>
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**Topic:** Biological Resources

**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.

- PG&E shall complete surveys and submit letter report to CPUC
- CPUC to review report
- 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 5-9: (pre-con)**

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 plant; 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.

- PG&E shall comply with all terms
- CPUC Environmental Monitor site visit to verify compliance.
- The buffer zone has been marked in the field and will be maintained throughout construction. A 20-foot buffer zone has been established. PG&E has copied CPUC the letters sent to the USFWS documenting the protocol for protecting elderberry plants.
### Timing of Action:

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<tr>
<td>MM 5-5:</td>
<td>To reduce the chance of spreading or introducing noxious plants in the project area, PG&amp;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&amp;E will eradicate them using proven methods such as herbicides or biological control agents. PG&amp;E will coordinate these efforts with the Butte County Department of Agriculture.</td>
<td>PG&amp;E to survey for Thistle, and document subsequent actions in a letter</td>
<td>CPUC to review report</td>
<td>The Vegetation Management, Erosion Control and Restoration Plan identifies equipment/vehicle cleaning procedures. This plan identifies PG&amp;E’s approach to weed management on the project. The plan was provided to the CPUC on 1/24/01.</td>
</tr>
</tbody>
</table>

### Topic: Cultural and Historic Resources

| 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. | PG&E to submit survey report to CPUC | CPUC to review report | A report was sent to CPUC on 1/4/01 regarding the survey completed for the laydown area on Neal Road. This mitigation measure has been completed and will be removed from future tables. |

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

<p>| 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. | PG&amp;E to provide training and document (with agenda and list of attendees) to CPUC | CPUC to review documentation; CPUC Environmental Monitor site visit to verify compliance | Cultural resource protective measures and appropriate response to unidentified resources will be discussed in the environmental training program. A copy of the training materials was provided to CPUC in the 1/24/01 submittal. A list of attendees to the training will be maintained throughout the project. This mitigation measure has been completed and will be removed from future tables. |</p>
<table>
<thead>
<tr>
<th>Timing of Action:</th>
<th>Mitigation Measure</th>
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<th>Monitoring Requirements</th>
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**Topic:** Cultural and Historic Resources

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.

Surveys will be scheduled and performed if additional needs, if any, are identified. A report was provided to CPUC on 1/4/01 documenting the survey for the laydown area on Neal Road and requesting approval by 1/22/01. This mitigation measure has been completed and will be removed from future tables.

**Topic:** Hydrology and Water Quality

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**Updated** Wednesday, March 07, 2001
### Timing of Action:

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<tr>
<th>Topic: Hydrology and Water Quality</th>
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<tbody>
<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. This mitigation measure has been completed and will be removed from future tables.</td>
</tr>
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</table>

**MM 9-2:**

PG&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 berm 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.

| MM 9-4:            | PG&E to submit Plan to CPUC and Butte County | CPUC and Butte County 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 will continue to be used to contain and control any oil release. |

**MM 9-4:**

PG&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.

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**Updated** Wednesday, March 07, 2001
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<td><strong>MM 12-4:</strong></td>
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<tr>
<td>PG&amp;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.)</td>
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<tr>
<td>Implementation: PG&amp;E to provide submit Plan for CPUC review</td>
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<tr>
<td>Monitoring: CPUC to review plan</td>
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<tr>
<td>Status: 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 were previously enlarged and will continue to be used to contain and control any oil release.</td>
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<tr>
<td><strong>MM 14-1:</strong> (pre-con)</td>
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<tr>
<td>Construction activities shall occur on road shoulders or in non-traffic lanes, where feasible, to avoid unnecessary lane closures.</td>
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<tr>
<td>Implementation: PG&amp;E to implement as defined; provide CPUC documentation of coordination with local agencies</td>
</tr>
<tr>
<td>Monitoring: Environmental Monitor site visit to verify compliance; CPUC to review coordination documentation</td>
</tr>
<tr>
<td>Status: PG&amp;E continues to coordinate with Butte County and the Town of Paradise regarding lane closures and walk on road shoulders. A copy of the encroachment permits will be 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.</td>
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<p>| MM 14-5: |
| PG&amp;E will notify Town of Paradise residents of scheduled lane closures. |
| Implementation: PG&amp;E to implement as defined; provide CPUC documentation that residents were notified |
| Monitoring: Environmental Monitor site visit to verify compliance; provide CPUC documentation that residents were notified |
| Status: PG&amp;E continues to coordinate with Butte County and the Town of Paradise regarding lane closures and walk on road shoulders. A copy of the encroachment permits will be 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. |</p>
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**Topic:** Transportation and Traffic

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<tr>
<th>MM 14-4: (pre-con)</th>
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<th>PG&amp;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.</th>
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<tbody>
<tr>
<td>--The Butte County Transportation Authority shall be notified of lane closures that will potentially affect bus stops in the project area.</td>
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<tr>
<td>--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.</td>
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**Topic:** Utilities and Service Systems

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<tr>
<th>MM 7-1: (pre-con)</th>
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<th>Surveys complete. U.S.A notifications will be made and documented by crew foremen during construction. This mitigation measure has been completed and will be removed from future tables.</th>
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<tr>
<td>Mitigation measures will ensure that impacts to other utilities will be less than significant:</td>
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<tr>
<td>--PG&amp;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.</td>
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<tr>
<td>--During construction, before any ground disturbance occurs, Underground Service Alert (USA) will be contacted to verify the location of existing underground utilities.</td>
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<tr>
<td>--Representatives from non-PG&amp;E utilities will be notified in advance of construction if construction will be occurring near their lines, and PG&amp;E will coordinate with them.</td>
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<tr>
<td>--PG&amp;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.</td>
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