

**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. 2: March 9 – March 30, 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 March 9, 2001 to March 30, 2001.

Work conducted during this time period was primarily limited to augering activities for the transmission towers along the power line right-of-way, adjacent to the Paradise Memorial Trailway. The power line crew has been augering holes at an approximate rate of two holes a day, on a four-day workweek.

CONSTRUCTION ACTIVITIES

Vegetation Clearing

Limited clearing operations are scheduled to resume on April 23, 2001 in areas where easements on several private properties have recently been acquired. Surveys for bird nests will be conducted before this work commences.

Power Line Construction

The power line construction crew has been drilling foundation holes along the Paradise Memorial Trailway with a crew of 3 workers and a foreman. A track-mounted auger is being used to drill most of the holes, with a truck-mounted auger used for the rest. A rubber-tired backhoe loads the spoil into a dump truck for off-site disposal, and then works the area to the original contour. As of March 30, 9 of the first 13 foundation holes have been completed. The construction crew was re-supplied with construction signs to notify and direct residents around construction areas. There has been minimal disturbance to the trailway as a result of the limited amount of equipment and personnel required to drill the holes. The trailway is being cleaned after each workday, and any additional holes spoil is moved off-site within 24 hours. Work is expected to continue on the first week of May south of Pearson Road.

I inspected project construction activities on March 28, 2001 (see photos attached). It was a warm sunny day with little to no wind. Active project construction was limited to an area approximately 200 yards south of Elliot Road on the Paradise Memorial trailway. The construction crew was in the process of augering an excavation for the foundation of Pole Number 6 about 20 feet east of the trailway. The crew consisted of four workers: 1) a backhoe operator; 2) an auger operator; 3) a worker that was coordinating the two operators; and 4) a worker that was continuously cleaning the trail with water and a broom to the south of the Pole Number 6 location. Also on site, about 40 yards north of the construction area, just east of the trail was a dump truck and a flat bed haul truck with a foundation casing loaded on it apparently for hole number 6.

I spoke briefly to the backhoe operator, "Doug". Doug informed me that augering the foundation for Pole Number 6 has been the hardest hole to dig thus far because it is located on a slope. Like most of the foundation holes, this hole will be dug to about 19 feet below the ground surface (bgs). An exception will be at Pole Number 7. This hole will need to be augered down to approximately 25 feet bgs, because the foundation will need to support an angle in the line. Groundwater is reported to be approximately 17 feet bgs. Excavated soils have been mostly clay rich with dispersed stones and cobbles. The bulldozer was at times partially blocking the trail, but the occasional trail user was easily able to safely walk around the construction area. Doug indicated that after hole number 6 is complete, 13 holes will have been excavated.

Paradise Substation Upgrades

The substation crew has demobilized and will be returning on April 3, 2001.

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.

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. During the site inspection, I noted that the caution tape around the elderberry bushes had been torn down at a location approximately one-quarter mile south of Foster Road.

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. There has been no construction activity near the plants since the January 25, 2001 tree removal activity.

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 $\frac{3}{4}$ inch plywood.

ADDITIONAL NOTES AND ISSUES

Steve Stielstra (Senior Lands Project Analyst, PG&E Co.) and Steve Craycroft (Environmental Inspection Manager, Essex Environmental) attended a pre-bid meeting on Wednesday, March 14 with potential restoration contractors. The project was reviewed, and project requirements (including training, etc.) were discussed.

PG&E Co. has noted that someone not related to the Paradise Area Reinforcement Project has dumped two large soil piles on the north side of Foster Road, adjacent to the Paradise Memorial Trailway. The soil is appeared to be topsoil (it has a high concentration of sod throughout the pile) and noticeably different than the spoil generated by the auger operations.

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 March 9 to March 30.

Attachments:

- A. Photos documenting the 3/28/01 site inspection
- B. PG&E Co.'s Paradise Mitigation Database Table (updated Wednesday, March 30, 2001).

cc: S. Lee; File (1224)

Key to Photos

Photo 1: Covered excavated hole, approximately 120 feet south of Elliot Road and 12 feet east of the trail, direction of the photo is towards the northwest. The wood covering the hole is estimated to be about 4 feet in diameter.

Photo 2: Project construction caution sign, facing south down the trialway. Project haul trucks are visible in the foreground.

Photo 3: Trailway open sign, facing south approximately 50 yards south of previous sign. Project truck with pole hole casing is visible to east of the trail

Photo 4: A worker is watering the trail near the construction work area, facing south. Active construction work can be seen taking place down the trial.

Photo 5: Auger and backhoe at hole location number 6, facing east.

Photo 6: Dozer is developing a level surface for the auger, facing east.

Photo 7: Auger is pulling out of hole; facing northeast.

Photo 8: Auger is spinning to drop load; facing north.

Photo 9: Auger is digging hole number 6; facing east.

Photo 10: Facing north, toward hole number 6 work.

Photo 11: Hole location number 7, facing north. Because this is pole location is going to be an angle in the power line, a bigger auger (visible in photo) will need to be used.

Photo 12: Caution tape that has been torn down.

Photo 13: Trail and caution tape, facing east.

Photo 14: Caution tape, facing northeast.

Photo 15: Caution tape, facing south, approximately one-quarter mile south of Foster Road.

Photo 16: Covered hole approximately 75 yards south of Pearson Road.

Photo 17: Truck with hole casing, facing southeast.

Photo 18: Dump truck waiting to haul away spoils from hole number 6, approximately 40 yards north of construction area.

PG&E Co.'s Paradise Mitigation Database

Timing of Action: Pre-construction	Mitigation Measure	Implementation Actions	Monitoring Requirements	Status
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

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Biological Resources</p>				
<p>MM 5-1:</p> <p>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 (<i>Fritillaria eastwoodiae</i>), Red Bluff dwarf rush (<i>Juncus leiospermus</i> var. <i>leiospermus</i>) and veiny monardella (<i>Monardella douglasii</i> ssp. <i>venosa</i>). 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.</p> <p>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</p> <p>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.</p>		<p>PG&E to perform surveys & submit survey report to CPUC, documenting avoidance proposals</p>	<p>CPUC Environmental Monitor to verify surveys; CPUC to review documentation</p>	<p>* Final surveys completed 5/19/00. No populations of sensitive plant species within the proposed area of disturbance. Copy of report provided to CPUC on 1/4/01. This mitigation measure has been completed.</p>
<p>MM 5-8:</p> <p>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 bats 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.</p>		<p>PG&E shall inspect trees for bats</p>	<p>CPUC Environmental Monitor to verify inspections;</p>	<p>* 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.</p>

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Biological Resources</p>				
<p>MM 5-7:</p> <p>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.</p>		<p>PG&E to submit vegetation management plan to CPUC & Town of Paradise</p>	<p>CPUC to review report</p>	<p>* This mitigation measure has been completed.</p>
<p>MM 5-3:</p> <p>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 on 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.</p>		<p>PG&E to perform surveys and document findings in a letter to CPUC</p>	<p>CPUC to review report</p>	<p>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.</p>
<p>MM 5-6: (pre-con)</p> <p>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).</p>		<p>PG&E to submit letter report documenting removal timing</p>	<p>CPUC to review report</p>	<p>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.</p>

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Biological Resources</p>				
<p>MM 5-2:</p> <p>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 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.</p> <p>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.</p>		<p>PG&E to survey wood poles and document findings in a letter to CPUC</p>	<p>CPUC Environmental Monitor to verify surveys; CPUC to review documentation</p>	<p>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.</p>
<p>MM 5-10:</p> <p>Should construction activity become necessary outside of the biological resources survey are 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.</p>		<p>PG&E shall complete surveys and submit letter report to CPUC</p>	<p>CPUC to review report</p>	<p>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.</p>

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Biological Resources</p>				
<p>MM 5-9: (pre-con)</p> <p>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:</p> <ul style="list-style-type: none"> --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. <p>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.</p>	<p>PG&E shall comply with all terms</p>	<p>CPUC Environmental Monitor site visit to verify compliance.</p>	<p>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.</p>	
<p>MM 5-11:</p> <p>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</p>	<p>PG&E to submit letter describing maintenance access proposal</p>	<p>CPUC to review letter</p>	<p>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.</p>	

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Biological Resources</p>				
<p>MM 5-5:</p> <p>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.</p>		<p>PG&E to survey for Thistle, and document subsequent actions in a letter</p>	<p>CPUC to review report</p>	<p>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.</p>
<p>Topic: Cultural and Historic Resources</p>				
<p>MM 6-4: (pre-con)</p> <p>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.</p> <p>(NOTE: Measure has been modified since PG&E submitted its PEA to the CPUC in January, 2000.)</p>		<p>PG&E to submit survey report to CPUC</p>	<p>CPUC to review report</p>	<p>* A report was sent to CPUC on 1/4/01 regarding the survey completed for the laydown area on Neal Road. This mitigation measure is complete, unless additional staging areas are required.</p>
<p>MM 6-1:</p> <p>The train depot and immediate vicinity shall be spanned by the power line if practicable to avoid potential indirect impacts to this structure.</p>		<p>PG&E to submit pole location design to CPUC</p>	<p>CPUC to review proposed pole locations</p>	<p>* Drawings of site and pole locations were submitted to CPUC 1/04/01. This mitigation measure has been completed.</p>
<p>V-2: (pre-con)</p> <p>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.</p>		<p>PG&E to provide reports to CPUC</p>	<p>CPUC to review and approve PG&E's survey reports.</p>	<p>* 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 is complete, unless additional staging areas are required.</p>

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Cultural and Historic Resources</p>				
<p>MM 6-2:</p> <p>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.</p>	<p>PG&E to provide training and document (with agenda and list of attendees) to CPUC</p>	<p>CPUC to review documentation</p>	<p>All personnel are required to attend environmental training prior to working on the project. A copy of the training materials was provided to the CPUC in the 1/11/01 submittal. A list of attendees to the training program will be maintained throughout the project. This mitigation measure is on-going.</p>	
<p>V-1: (pre-con)</p> <p>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 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&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.</p>	<p>PG&E to provide training and document (with agenda and list of attendees) to CPUC</p>	<p>CPUC to review documentation; CPUC Environmental Monitor site visit to verify compliance.</p>	<p>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 is on-going.</p>	
<p>XIII-1:</p> <p>PG&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&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.</p>	<p>PG&E to provide report to the Town of Paradise and the CPUC</p>	<p>CPUC to review and approve PG&E's report.</p>	<p>PG&E has had continued discussions with the Town regarding Trailway protection and repair measures. The Trailway protection plan summarizing protection measures was submitted to the Town and the CPUC on 12/22/00. The pre-construction component of this mitigation measure has been completed.</p>	

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

Timing of Action: Pre-construction	Mitigation Measure	Implementation Actions	Monitoring Requirements	Status
Topic: Cultural and Historic Resources				
MM 6-3: (pre-con) 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.)		PG&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.	This is included as a pre-construction measure in the Neg. Dec. (see V-1). Mitigation will be implemented during construction if necessary. A copy of the training materials was provided to the CPUC in the 1/11/01 submittal. The pre-construction component of this mitigation requirement has been completed.
Topic: Geology and Soils				
MM 8-1: 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.		PG&E to submit letter describing areas of geologic concern and actions taken	CPUC to review report	* Pole locations were based on standard design criteria, including the geologic and slope stability in the area. PG&E has addressed the requirements in a letter to the CPUC 1/11/01. Poles generally will not be located on steep slopes. This mitigation measure has been completed.
Topic: Hydrology and Water Quality				

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

Timing of Action: Pre-construction	Mitigation Measure	Implementation Actions	Monitoring Requirements	Status
Topic: Hydrology and Water Quality				
MM 9-1:	<p>PG&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 bar 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.</p> <p>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.</p>	PG&E to submit plan and conduct training (documented by submittal of agenda and attendee list)	CPUC, Butte County, Town of Paradise to review plan; CPUC Environmental Monitor site visit to verify compliance	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

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Hydrology and Water Quality</p>				
<p>MM 9-2:</p>				
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>				
<p>MM 9-4:</p>				
<p>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.</p>				

Topic: Land Use

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

Timing of Action: Pre-construction	Mitigation Measure	Implementation Actions	Monitoring Requirements	Status
Topic: Land Use				
MM 10-1: Prior to construction, PG&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&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.		PG&E to provide CPUC with a copy of the advanced notice for review and approval. PG&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.	CPUC to review notice	* 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.
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.

Updated Friday, March 30, 2001

Timing of Action: Pre-construction	Mitigation Measure	Implementation Actions	Monitoring Requirements	Status
Topic: Transportation and Traffic				
<p>MM 14-1: (pre-con)</p> <p>Construction activities shall occur on road shoulders or in non-traffic lanes, where feasible, to avoid unnecessary lane closures.</p> <p>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.</p> <p>PG&E shall notify Town of Paradise and Butte County residents of scheduled lane closures.</p> <p>PG&E shall use traffic control personnel during lane closures. Standard traffic control techniques will include flagmen, warning signs, cones, and lights.</p>		<p>PG&E to implement as defined; provide CPUC documentation of coordination with local agencies</p>	<p>Environmental Monitor site visit to verify compliance; CPUC to review coordination documentation</p>	<p>PG&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 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.</p>
<p>MM 14-5:</p> <p>PG&E will notify Town of Paradise residents of scheduled lane closures.</p> <p>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.</p>		<p>PG&E to implement as defined; provide CPUC documentation that residents were notified</p>	<p>Environmental Monitor site visit to verify compliance; provide CPUC documentation that residents were notified</p>	<p>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.</p>
<p>MM 14-4: (pre-con)</p> <p>--The Butte County Transportation Authority shall be notified of lane closures that will potentially affect bus stops in the project area.</p> <p>--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.</p>		<p>PG&E to implement as defined; provide CPUC documentation of coordination with local agencies</p>	<p>Environmental Monitor site visit to verify compliance; CPUC to review coordination documentation</p>	<p>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.</p>

Topic: Utilities and Service Systems

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Utilities and Service Systems</p>				
<p>MM 7-1: (pre-con)</p> <p>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 (US) 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.</p>	<p>PG&E to comply with stated requirements</p>	<p>CPUC to review documentation; CPUC Environmental Monitor site visit to verify compliance.</p>	<p>* Surveys complete. U.S.A notifications will be made and documented by crew foremen during construction. This mitigation measure has been completed.</p>	
<p>Topic: Visual Resources</p>				
<p>MM 15-5:</p> <p>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.</p> <p>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.</p> <p>(NOTE: Measure has been modified since PG&E submitted its PEA to the CPUC in January, 2000.)</p>	<p>PG&E to provide clearing plan to CPUC and Town of Paradise for review</p>	<p>CPUC and Town of Paradise to review plan</p>	<p>* Flagging/marketing completed in the field. A vegetation removal plan was submitted to the Town and CPUC on 12/18/00. This mitigation measure has been completed.</p>	

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001

<p><i>Timing of Action:</i> Pre-construction</p>	<p><i>Mitigation Measure</i></p>	<p><i>Implementation Actions</i></p>	<p><i>Monitoring Requirements</i></p>	<p><i>Status</i></p>
<p>Topic: Visual Resources</p>				
<p>MM 15-3: (pre-con)</p> <p>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&E will: --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.</p> <p>(NOTE: Measure has been modified since PG&E submitted its PEA to the CPUC in January, 2000.)</p>		<p>PG&E to implement as defined</p>	<p>Environmental Monitor site visit to verify compliance</p>	<p>PG&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.</p>
<p>MM 15-1: (pre-con)</p> <p>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 conductor 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.</p>		<p>PG&E to implement as defined</p>	<p>Environmental Monitor site visit to verify compliance</p>	<p>The mitigation requirements has been incorporated into project plans and designs. The pre-construction component of this requirement has been completed.</p>
<p>MM 15-2:</p> <p>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.</p>		<p>PG&E to implement as defined; provide CPUC documentation that PG&E coordinated with other utilities</p>	<p>Environmental Monitor site visit to verify compliance; provide CPUC documentation that residents were notified</p>	<p>This requirement has been incorporated into the project's design. The pre-construction component of this mitigation measure has been completed.</p>

* Mitigation Measure has been completed.

Updated Friday, March 30, 2001