

# PACIFIC GAS AND ELECTRIC COMPANY'S HOLLISTER 115 KV POWER LINE RECONDUCTORING PROJECT

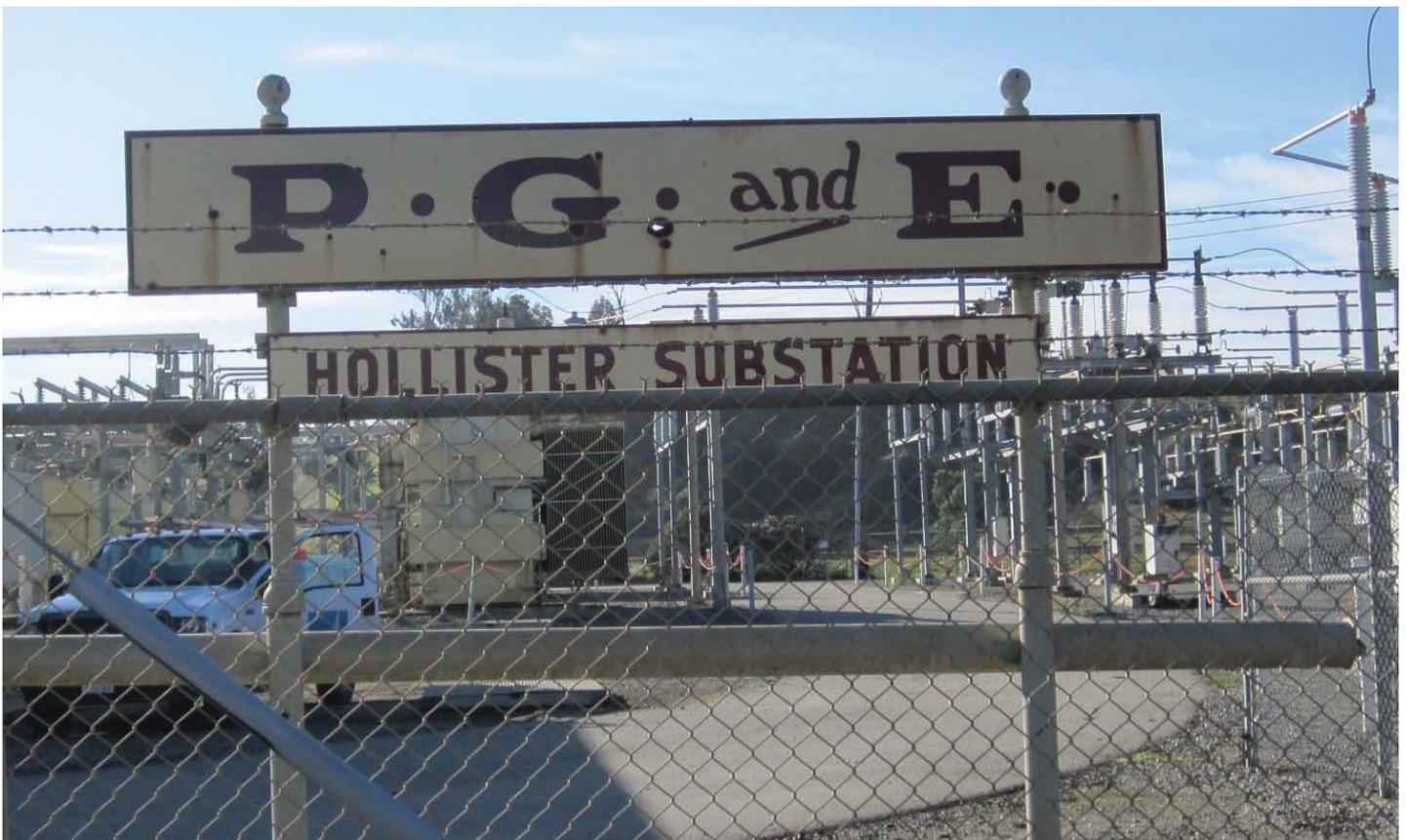
Mitigation Monitoring, Reporting, and Compliance Program  
CPUC A.09-11-016

Lead Agency

September 2011



California Public Utilities  
Commission





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# CHAPTER 1

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## Introduction

### 1.1 Overview and Purpose

The Initial Study/Mitigated Negative Declaration (IS/MND) for the PG&E Hollister 115 kV Power Line Reconductoring Project, as adopted by the California Public Utilities Commission (CPUC) January 27, 2011, includes procedures for preparing and implementing a Mitigation Monitoring, Reporting, and Compliance Program (MMRCP) to ensure compliance with mitigation measures approved in the adopted IS/MND. The adopted IS/MND includes the Draft IS/MND and the Final IS/MND, which includes responses to public comments and minor changes to the Draft IS/MND. Section 5, *Mitigation Monitoring, Reporting, and Compliance Program*, of the Draft IS/MND provides the recommended framework for the implementation of the MMRCP by the California Environmental Quality Act (CEQA) Lead Agency, the CPUC, and describes the roles and responsibilities of responsible agencies in implementing and enforcing adopted mitigation measures. This updated MMRCP is meant to be a standalone guide that includes the information provided in Section 5 of the Draft IS/MND and Section 3 of the Final IS/MND, as well as specific protocols, guidelines, and standardized procedures for environmental compliance to be followed prior to and during construction by CPUC third-party Environmental Monitors (CPUC third party EMs) and PG&E project staff. The goal of the MMRCP is to provide a clear understanding of the project's organization, establish lines of communication related to mitigation monitoring, and establish a method to effectively document and report compliance with all of the mitigation measures.

The project's MMRCP includes direct participation and commitment from PG&E and CPUC third party EMs. The success of the program depends on the project management staff, monitors, and construction contractor personnel. The procedures have been developed in coordination with PG&E, CPUC, and CPUC third party EMs to help define the reporting relationships, provide detailed information about the roles and responsibilities of the project's environmental compliance team members, define compliance reporting procedures, and to establish a communication protocol.

### 1.2 Authority of the Program

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported.

In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a reporting or monitoring program when it approves a project that is subject to preparation of a Mitigated Negative Declaration (MND) and where the MND for the project identifies significant adverse environmental effects. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting. The CPUC views the MMRCPP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, reporting, and compliance activities of the CPUC and any monitors it may designate.

## **1.3 Project Overview**

### **1.3.1 Construction Components**

The project has been divided into three components as shown in Table 1.

In general, the mitigation measures are applicable to all project components; however, certain biological protection measures are specific to habitat types. PG&E will work closely with contractor staff to ensure that site-specific mitigation measures are clearly identified.

### **1.3.2 Notice-to-Proceed**

Project related construction activities will not begin until applicable pre-construction mitigation measures and submittals have been satisfied. Once pre-construction mitigation measures have been completed for a specific set of identified construction activities, PG&E shall submit a request for a Notice-to-Proceed (NTP) for each of the identified construction activities. The construction activities to be completed as part of each NTP have been determined by PG&E based on the construction schedule, the anticipated schedule for permit approvals, and other considerations. The CPUC will issue a NTP for the applicable project components upon evaluation of PG&E's request and confirmation that all applicable pre-construction mitigation measure requirements have been completed. The NTP may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. Section 4.3, *Applicant Proposed Measures (APMs) and Mitigation Measures*, lists the mitigation measures, the timing for completion, and whether CPUC review or approval is required before construction can commence. Table 2 shows PG&E's estimated construction schedule by activity and applicable NTPs that will be required for construction to commence.

### **1.3.3 Project Compliance Requirements**

This program is intended to provide pertinent information necessary to successfully implement the MMRCPP during construction. The Applicant Proposed Measures (APMs) and mitigation measures listed in Section 4.3, *Applicant Proposed Measures (APMs) and Mitigation Measures*, can be found in Section 3, *Environmental Checklist and Discussion*, of the Final IS/MND. Detailed discussions on the intent of each mitigation measure and potential impacts that could result if the mitigation measures are not implemented properly are provided in Sections 3.1 through 3.17 of the Draft IS/MND. In addition to compliance with these APMs and mitigation

**TABLE 1  
SUMMARY OF PROJECT COMPONENTS**

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**Hollister Tower Segment**

- Line length: Approximately seven miles.
  - Conductor: Reconstruct both circuits of the existing double-circuit 115 kV power line with installation of two circuits of 477 thousand circular mils (kcmil) SSAC conductor, 0.846 inch in diameter. Each circuit would have three conductors. The minimum ground to conductor clearance would be 30 feet.
  - Replace 36 of the 38 existing towers with new LSTs and install one new LST along the existing alignment; retain two existing towers resulting in 39 towers within the existing alignment. The towers to be removed would be replaced with new towers similar in size and design.
  - Structures to be installed: 37 LSTs.
  - Structure heights: Similar to existing; averaging 82 feet above ground surface (ags).
  - Span lengths: Between 51 feet to 1,847 feet, averaging approximately 850 feet long.
  - Footings: Each LST would be built on four drilled pier concrete footings. A typical footing would be approximately three feet aboveground; subsurface dimensions of each footing would depend on variables such as topography, tower height, span length, and soil properties.
- 

**Hollister Pole Segment**

- Line length: Approximately nine miles.
  - Conductor: Reconstruct existing single-circuit 115 kV subtransmission line as a double-circuit 115 kV subtransmission line, utilizing a 477 kcmil SSAC conductor (0.846 inch in diameter) for each circuit; each circuit would have three conductors; minimum ground to conductor clearance would be 30 feet.
  - Replace 154 existing poles with a combination of 30 TSPs and 135 LDS poles (total number of poles: 165) in the same alignment, except for the Proposed River Crossing (discussed below).
  - Structures: Combination of TSPs and LDS poles with a rusted brown finish.
  - Pole size: Approximately 70 to 95 feet in height (approximately five to 10 feet taller than existing poles) and approximately two to seven feet in diameter at the base (existing wood poles are approximately 18 inches to 24 inches at the base).
  - Span lengths: Between 94 feet to 935 feet, averaging approximately 295 feet long.
  - **River Crossing:**
    - Existing River Alignment: Top 17 wood poles, 12 of which are located in the floodplain of the San Benito River and five of which are located in the agricultural field west of the river; topping refers to shortening of poles by removing the existing power line and cutting down the excess length to the level of the lower distribution line. Remove approximately eight poles within the floodplain.
    - Proposed River Crossing: Install approximately 21 new steel poles, four TSPs and 17 LDS poles, approximately 3,000 feet north of the existing river alignment.
- 

**Hollister Substation Modifications**

- Relocate two existing poles on the substation property
  - Update relay setting
  - Change the 115 kV bus conductors
- 

**TABLE 2  
ESTIMATED CONSTRUCTION SCHEDULE**

Notice to Proceed #	Construction Activities	Duration (months)	Anticipated Start Date
1	Shoo-fly connections to upgrade the Watsonville-Salinas line during construction, replacement of the first mile of the Hollister Pole Segment, and Llagas Substation work and Natividad Switch work.	15	October 2011
2 - ?	Dependant on conditions such as weather and permit restrictions.	15	?

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measures, construction activities also must be conducted in accordance with the requirements stipulated in the following documents:

- Stormwater Pollution Prevention Plan (SWPPP)
- Road encroachment permits
- Clean Water Act (CWA) Section 404 nationwide permit from the U.S. Army Corps of Engineers (ACOE)
- CWA Section 401 water quality certification from the Regional Water Quality Control Board (RWQCB)
- CWA Section 402/National Pollutant Discharge Elimination System (NPDES) permit from the State Water Board (requiring preparation of an SWPPP)
- Section 1602 Streambed Alteration Agreement and Incidental Take Permit from the California Department of Fish and Game (CDFG)
- Biological Opinion from the U.S. Fish and Wildlife Service (USFWS).

## 1.4 Agency Jurisdiction

In addition to the CPUC, several local, State, and federal agencies have jurisdiction over lands within the project area. The CPUC, as the lead agency, is responsible for ensuring that mitigation measures reviewed and approved by jurisdictional agencies and incorporated in the Final IS/MND process are implemented throughout construction. However, jurisdictional agencies may visit the project site from time to time and request information regarding the status of a mitigation measure. PG&E is responsible for satisfying requests from jurisdictional agencies and will notify and copy the CPUC on all correspondences related to final approvals and verifications for the project if not otherwise copied on the correspondence. Additional information on communication protocols can be found in Section 2.3, *Communication*. Table 3 lists the contact information for the staff of the jurisdictional agencies associated with the project.

**TABLE 3  
ASSOCIATED JURISDICTIONAL AGENCIES**

Agency	Address	Contact Person	Phone Number	Email
USFWS	2493 Portola Road, Suite B Ventura, California 93033	Lena Chang	(805) 644-1766 ext. 302	lena_chang@fws.gov
CDFG Region 4	1234 E. Shaw Avenue, Fresno, California 93710	Brandon Sanderson	(805) 594-6141	bsanderson@dfg.ca.gov
Regional Water Quality Control Board, District 3	895 Aerovista Place, Suite 101 San Luis Obispo, California 93401	David Innis	(805) 549-3150	DBInnis@waterboards.ca.gov
San Benito County, Planning Division	3224 Southside Road Hollister, California 95023	Byron Turner	(813) 637-5313	bturner@cosb.us
Monterey County, Planning Division	168 W. Alisal Street, 2nd Floor Salinas, California 93901	Mike Novo		

# CHAPTER 2

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## Roles and Responsibilities

This section describes the roles and responsibilities of key project personnel with respect to the MMRCPP. Figure 1 provides an organizational chart of project members responsible for implementing the MMRCPP and their relationship to other staff working on the project. The organization chart also establishes preliminary lines of communication between the project team.

### 2.1 Organization Overview

#### 2.1.1 PG&E Project Manager

PG&E Project Manager provides the overall direction, management, leadership, and corporate coordination for the construction project. The Project Manager's responsibilities related to the environmental program include, but are not limited to:

- Coordinate between engineering, construction management, and environmental staff
- Provide leadership by integrating environmental responsibilities into all levels of the project organization
- Ensure compliance with project policies, guidelines, and procedures
- Communicate project activities, schedules, and public relation issues to the project team.

#### 2.1.2 PG&E Construction Lead

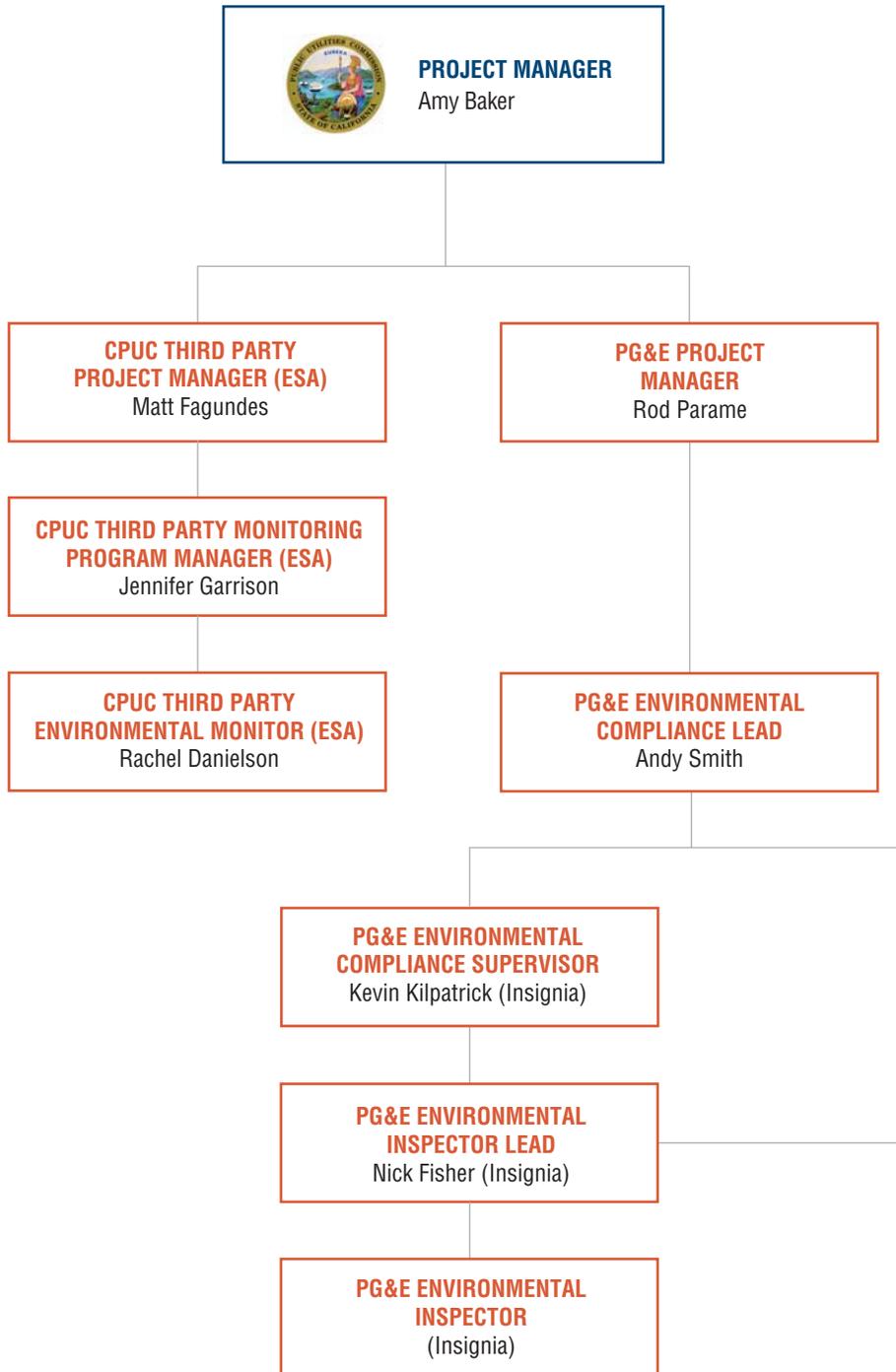
The PG&E Construction Lead is the primary point of communication with the construction contractor and/or PG&E crews, and provides direction, management, leadership, and coordination for the construction team. The PG&E Construction Lead ensures that construction activities, schedules, and changes are coordinated with PG&E's environmental staff.

#### 2.1.3 PG&E Field Representatives

Construction activities will be performed by a combination of PG&E crews and a construction contractor. PG&E crews will install the towers and the foundations for the tubular steel poles. The construction contractor will install the light duty steel poles and the tubular steel poles on PG&E's foundations. The PG&E Field Representative may be a Chief Construction Inspector and/or a PG&E Foreman. A Chief Construction Inspector will manage day-to-day construction activities and will be available in the field on a daily basis when the construction contractor is working; a PG&E Foreman will perform this role when PG&E crews are working. The PG&E



**Figure 1 ORGANIZATIONAL CHART**  
PG&E Hollister 115 kV Power Line Reconductoring Project



Field Representatives will coordinate with the contractor and the Environmental Inspectors to ensure environmental compliance and timely resolution of issues.

### **2.1.4 PG&E Environmental Compliance Lead**

The PG&E Environmental Compliance Lead coordinates input from multiple disciplines and is responsible for overseeing compliance with all environmental mitigation measures, permit conditions, and regulatory requirements for the project. The PG&E Environmental Compliance Lead functions as the single point of contact for the PG&E Project Manager regarding environmental compliance issues during construction.

### **2.1.5 PG&E Project Environmental Discipline Leads (PG&E Biologist and PG&E Cultural Resources Specialist)**

The PG&E Environmental Compliance Lead will typically coordinate project input from the Project Environmental Discipline Leads. Each PG&E Project Environmental Discipline Lead oversees implementation of specific technical mitigation measures and permit conditions and ensures projects follow appropriate technical protocols.

While the responsibilities of these internal experts are somewhat discipline-specific, they typically include:

- ensuring that the project follows appropriate technical protocols for their technical discipline;
- reviewing the qualifications and training of proposed Consultant Specialty Monitors and the proposed scope of work for specialty monitoring related to their technical discipline;
- collaborating with the PG&E Environmental Compliance Lead to provide direction, management, and support to the PG&E Environmental Inspectors within their technical discipline;
- preventing and resolving compliance issues associated with their technical discipline;
- providing technical input to facilitate resolution of unanticipated occurrences related to their technical discipline; and
- collaborating with the PG&E Environmental Compliance Lead to ensure compliance with any long-term environmental mitigation commitments in project permits (e.g., submitting annual reports to document revegetation success).

### **2.1.6 CPUC Project Manager**

The CPUC Project Manager will determine the effectiveness of the MMRCP based on the success criteria included in the mitigation monitoring table. The CPUC will delegate monitoring and reporting responsibilities to third-party monitors during construction and will oversee their work through review of daily and weekly status reports. The CPUC Project Manager will be notified of noncompliance situations and may suggest measures to help resolve the issue(s). All variance requests will be submitted to the CPUC Project Manager for review and approval.

## 2.1.7 CPUC Third Party Environmental Monitors

The CPUC will delegate monitoring and reporting responsibilities to a third-party monitoring consultant. The number of CPUC Third Party Environmental Monitors (EMs) and frequency of site inspections will depend on the number of concurrent construction activities and their locations. The CPUC Third Party EMs will report directly to the Third Party Monitoring Program Manager that will oversee the day to day monitoring activities of the EMs, as well as determine the appropriate level of inspection frequency. The overall monitoring program will be administered under the direction and oversight of the CPUC Project Manager and the Third Party Project Manager. CPUC Third Party EMs will be an integral part of the project team and will stay apprised of construction activities, schedule changes, and construction progress. The CPUC Third Party EMs will document compliance through weekly reports and use of a mitigation measure tracking table.

## 2.1.8 PG&E Environmental Compliance Supervisor and Environmental Inspectors

PG&E has contracted with Insignia Environmental to represent the PG&E Environmental Compliance Supervisor and Environmental Inspectors for the Project. The Environmental Compliance Supervisor will directly manage the environmental inspectors and support PG&E's Environmental Compliance Lead with overall management of the environmental inspection and specialty monitoring program during construction. All inspectors, and the Environmental Compliance Supervisor, will be qualified biologists. PG&E Environmental Inspectors are PG&E's primary field staff responsible for evaluating, documenting, and verifying that construction activities comply with all applicable mitigation requirements and State, Federal, and local permit requirements. The PG&E Environmental Inspectors directly represent PG&E and have the authority and responsibility to enforce the environmental requirements of Project permits and mitigation measures.

The PG&E Lead Environmental Inspector will coordinate and oversee the activities of the PG&E Environmental Inspectors and Consultant Specialty Monitors in coordination with the Environmental Compliance Supervisor and with the PG&E Compliance Lead and appropriate Discipline Leads. The PG&E Lead Environmental Inspector will coordinate daily with the PG&E Field Representatives and onsite CPUC Third Party EMs to facilitate compliance.

## 2.1.9 Construction Personnel

The construction Contractor has significant responsibilities for compliance with the environmental requirements of the project. The Contractor will be responsible for incorporating all project environmental requirements into their day-to-day construction activities.

Key environmental responsibilities for Contractor staff include, but are not limited to:

- Verify that all construction workers attend the project's environmental training program prior to beginning work on the right-of-way.

- Review and understand the environmental requirements
- Implement environmental protection requirements and conditions during construction and maintain compliance with project requirements
- Respond to PG&E's Environmental Inspectors requests during construction.

### **2.1.10 Mitigation Monitoring Program Contact List**

A project contact list has been included as Attachment A. The contact list includes the names of PG&E Environmental Inspectors and CPUC Third Party EMs, project managers, supervisory staff, and other members of the project team. The list also includes phone numbers, fax numbers, and email addresses where project members can be reached during construction. The contact list will be updated periodically and redistributed to the project team.

## **2.2 Responsibilities**

### **2.2.1 Monitoring**

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and APMs are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this monitoring program and has primary responsibility for implementation of the monitoring program. As previously mentioned, the CPUC has delegated monitoring responsibilities to a third-party monitoring consultant. The CPUC Third Party EMs will be in field on a regular basis, particularly when construction activities have the potential to impact a sensitive resource. Responsible agencies, such as the USFWS, CDFG, and RWQCB may elect to monitor construction or conduct a site visit during construction.

PG&E may elect to have one or more full-time environmental inspectors on site on a daily basis to coordinate specialty inspectors and assist construction crews with interpreting mitigation measures and correcting compliance problems in a timely manner. Environmental inspectors would also provide environmental training, as required under APM BIO-1, as new workers arrive on the project.

### **2.2.2 Enforcement**

The CPUC is responsible for enforcing the procedures adopted for monitoring through the CPUC Third Party EMs assigned to each segment. The CPUC Third Party EMs shall note problems with monitoring, notify designated project members, and report the problems to the CPUC Project Manager.

The CPUC has the authority to halt any construction activity associated with the Hollister 115 kV Power Line Reconductoring Project if the activity is determined to be a deviation from the approved project or adopted mitigation measures. The CPUC may assign this authority to the CPUC Third Party EM in the field on a case-by-case basis.

Every effort should be made to contact the PG&E Lead Environmental Inspector and/or the PG&E Construction Lead before temporarily halting or redirecting a construction activity. Work will only be halted when worker safety is assured.

If a PG&E Environmental Inspector and/or the PG&E Construction Lead are not available, the CPUC Third Party EM may need to take immediate action to halt or redirect a construction activity to prevent irreparable harm to sensitive resources. Any halting or redirecting of a construction activity must be followed up by a phone call (and voicemail message if there is no answer) to the PG&E Lead Environmental Inspector who will subsequently coordinate with the PG&E Construction Lead, the PG&E Environmental Compliance Lead, and the appropriate PG&E Discipline Lead. The PG&E Lead Environmental Inspector should also document the event in the Environmental Inspection Report.

### **2.2.3 Mitigation Compliance**

PG&E is responsible for successfully implementing all the APMs and adopted mitigation measures identified in this MMRCP. The MMRCP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the permit process.

PG&E shall inform the CPUC and its monitors in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC in coordination with its monitors will assess whether alternative mitigation is appropriate and specify to PG&E the subsequent actions required.

The CPUC Third Party EM's primary point of contact with PG&E in the field is the PG&E Lead Environmental Inspector. The CPUC Third Party EM will contact the PG&E Lead Environmental Inspector if an activity is observed that conflicts with one or more of the mitigation measures and/or permit conditions, so that the situation can be corrected. If the CPUC Third Party EM cannot immediately reach the PG&E Lead Environmental Inspector, then the PG&E Environmental Compliance Lead will be contacted to address the problem. Similarly, the CPUC Third Party EM will contact the PG&E Lead Environmental Inspector for information on where construction crews are working, the status of mitigation measures and/or permit conditions, and schedule forecasts. The CPUC Third Party EM will not direct the contractor, however, the EM has the authority to stop work, when worker safety is assured, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area). Any questions regarding the status of mitigation measures and/or permit condition will be directed to the PG&E Lead Environmental Inspector in the field, the PG&E Environmental Compliance Lead, or the appropriate PG&E Discipline Lead.

## 2.3 Communication

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible shut-downs, environmental and construction representatives will need to interact regularly and maintain professional, responsive communications at all times. Similarly, PG&E representatives will need to coordinate closely with CPUC Third Party EMs to address and resolve issues in a timely manner. Therefore, Section 2.3, *Communication*, of this MMRCP provides a communication protocol to accurately disseminate information on on-going surveys and mitigation measures, construction activities, contractors, and planned or upcoming work to all levels of the project. Attachment B includes a communication protocol summary to be used as quick reference and to supplement the information provided in Section 2.3.

A pre-construction meeting will be held with the CPUC, PG&E, and CPUC Third Party EMs to review the MMRCP and mutually agree on the project's communication protocol. Based on discussion at that meeting and input from each party, Attachment B of this document may be revised and redistributed.

### 2.3.1 Construction Progress Meetings

It is expected that PG&E will conduct construction progress field meetings with construction managers, contract administrators, and environmental representatives as needed to ensure compliance with the MMRCP. Regular meeting participants will at minimum include the PG&E Lead Environmental Inspector, the PG&E Compliance Lead, the PG&E Discipline Leads, and the PG&E Field Representatives.

### 2.3.2 Daily Communication

Many of the problems that come up during construction can be resolved in the field through regular communication between the CPUC Third Party EM, PG&E, and construction contractors. Field staff will be equipped with cell phones and available to receive phone calls at all times during construction. A project contact list has been included in Attachment A. The organization chart depicted in Chapter 2 generally shows the lines of communication to be used during construction. The following provides additional guidelines to ensure effective communication in the field.

#### CPUC Third Party EM

The CPUC Third Party EM's primary point of contact with PG&E in the field is PG&E's Lead Environmental Inspector. The CPUC Third Party EM will contact PG&E's Lead Environmental Inspector if an activity is observed that conflicts with one or more of the mitigation measures, so that the situation can be corrected. If the CPUC Third Party EM cannot immediately reach PG&E's Lead Environmental Inspector, then the PG&E Environmental Compliance Lead or the PG&E Discipline Leads will be contacted to address the problem. Similarly, the CPUC Third Party EM will contact PG&E's Lead Environmental Inspector for information on where construction crews are working, the status of mitigation measures, and schedule forecasts. The CPUC Third Party EM will not direct the contractor, however, the EM has the authority to stop work,

assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area).

## **PG&E**

PG&E will provide the CPUC Third Party EM with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title, responsibility, and whether their position is segment-specific. The contact list will be updated as new project personnel are assigned to the project and redistributed as necessary.

PG&E will prepare and distribute a monthly environmental compliance status report for distribution to key project members, including the CPUC. The CPUC Third Party EM will review the monthly report to ensure that the status of mitigation measures is consistent with observations in the field. Any questions regarding the status of mitigation measures will be directed to the PG&E Lead Environmental Inspector, and as necessary, the PG&E Compliance Lead and appropriate Discipline Leads. The monthly environmental compliance status report will also be a tool to keep all parties informed of construction progress and schedule changes.

### **2.3.3 Communicating Compliance Issues**

Section 3.1.2, *Compliance Reporting*, describes procedures to communicate incidences and non-compliances identified by the CPUC Third Party EMs during site inspections.

### **2.3.4 Coordination with Other Agencies**

As discussed in Section 1.4, *Agency Jurisdiction*, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. PG&E will be responsible for contacting resource agencies and immediately notifying them of issues regarding their jurisdiction. The CPUC Third Party EM may request copies of email correspondences, phone logs, or other documentation between PG&E and resource agencies to avoid direct involvement from CPUC Third Party EMs. However, if there is an unresolved issue regarding compliance with a mitigation measure or permit requirement under the jurisdiction of a resource agency, the CPUC Third Party EM may elect to contact the agency to discuss resolution. The CPUC Third Party EM will coordinate this call with PG&E and provide opportunity to participate in the call.

### **2.3.5 Dispute Resolution**

It is expected that the MMRCPP will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur. In such event, the following procedure will be used:

- Step 1.** Disputes and complaints (including those of the public) should be directed to the CPUC Project Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute.
- Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the Proposed Project or adopted MMRCP.
- Step 3.** If a dispute or complaint regarding the implementation or evaluation of the Program or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written “notice of dispute” with the CPUC’s Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Involved parties may also seek review by the Commission through existing procedures specified in the Commission’s Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.



## CHAPTER 3

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# Environmental Compliance and Field Procedures

## 3.1 Mitigation Measure Compliance and Reporting

### 3.1.1 Compliance Verification

The CPUC Third Party EMs will conduct routine site visits to determine compliance with the mitigation measures. Site visits may be coordinated with PG&E or conducted unannounced. Supplemental information provided by PG&E, including pre-construction submittals, survey reports, monthly reports, meeting notes, and agency correspondences, will also be used to verify compliance.

### 3.1.2 Compliance Reporting

The CPUC Third Party EMs will document observations through the use of field notes and digital photography. In addition, field inspection forms will be utilized in the field to document compliance of specific crews, construction activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate weekly status reports and update the status of mitigation measures listed in Section 4.3, *Applicant Proposed Measures (APM) and Mitigation Measures*. A sample site inspection form has been included in Attachment C.

### 3.1.3 Compliance Levels

#### Acceptable

Site-specific conditions or activities that achieve compliance with the Project's environmental requirements are documented by PG&E's Lead Environmental Inspector in the Environmental Inspection Report as "acceptable." Following are some examples of what would be considered acceptable:

- available topsoil is being stripped to the appropriate depth;
- exclusion zone fencing is intact around the sensitive resource adjacent to the contractor yard. All activity is out of the exclusion zone; and
- silt fence is installed correctly on the west side of the site as specified in the SWPPP.

## Occurrence

An “occurrence” is an activity or occurrence that needs to be highlighted and addressed, but does not necessarily affect the Project’s compliance record. Examples of occurrences include:

- an unanticipated cultural resource is discovered and associated required measures are followed;
- a hydraulic hose breaks and the contractor immediately contains and cleans up the spill according to project requirements.

The PG&E Lead Environmental Inspector would immediately notify the PG&E Environmental Compliance Lead of an occurrence, who would be responsible for ensuring that any required agency notifications are made. The occurrence would be documented in PG&E’s monthly environmental compliance status report.

## Minor Problem

A “minor problem” is a slight deviation from the environmental requirements with little or no impact to sensitive resources. Some examples of minor problems include:

- failing to remove trash from the work area;
- improperly installing erosion control devices; and
- neglecting to maintain erosion control devices.

PG&E should address minor problems as soon as possible to prevent further problems. The PG&E Lead Environmental Inspector would report minor problems and associated corrections to the CPUC Third Party EM within twenty-four hours and would document minor problems in PG&E’s monthly environmental compliance status report. If the minor problem is observed by the CPUC Third Party EM, the EM may elect to issue a minor problem report to the PG&E Lead Environmental Inspector to get the issue corrected. If the PG&E crew or contractor fails to address a minor problem in a timely manner, or conditions worsen due to a lack of response, the PG&E Lead Environmental Inspector and/or the CPUC Third Party EM may elevate the compliance level to a compliance issue or non-compliance.

## Compliance Issue

A compliance issue is a situation in the field that needs to be addressed immediately to prevent resource damage or environmental non-compliance. In addition, a compliance issue may be identified by the PG&E Lead Environmental Inspector or the CPUC Third Party EM if there are repeated minor problems that, as a group, show a trend toward placing resources at unnecessary risk. Compliance issues are typically addressed immediately or before the end of the workday. Some examples of a compliance issue include:

- placing soil or construction material outside of the approved work area in a non-sensitive area and removing it by the end of the day;

- storing fuels closer than 100 feet from a water body or wetland without providing secondary containment; and
- using an unapproved access road in a way that does not damage the road or resources.

Compliance issues that are resolved by the end of the day will be documented by the Lead Environmental Inspector and reported to the CPUC Third Party EM within twenty-four hours. If the compliance issue is observed by the CPUC Third Party EM, the EM may elect to provide a compliance issue report to the PG&E Lead Environmental Inspector to get the issue corrected. The Lead Environmental Inspector will immediately report compliance issues to the PG&E Compliance Lead and appropriate PG&E Discipline Lead. If the PG&E crew or contractor fails to address an issue in a timely manner, or conditions worsen due to a lack of response, the Lead Environmental Inspector and/or the CPUC Third Party EM may elevate the compliance level to a non-compliance.

## Non-Compliance

“Non-compliance” is assigned to an activity that violates the environmental requirements and results in an impact to resources or places environmental resources at risk. Some examples of non-compliance include:

- placing soil or construction material outside of the approved work area in an environmentally sensitive area;
- dewatering the trench near a sensitive resource without installing appropriate erosion and sediment control devices;
- cutting down a tree with a raptor nest;
- driving “cross-country” through a delineated sensitive resource area; and
- continuing to operate equipment after being requested to halt temporarily by the PG&E Lead Environmental Inspector or PG&E Field Representatives.

The PG&E Lead Environmental Inspector and/or CPUC Third Party EM would immediately issue a Non-Compliance Notice to the PG&E Environmental Compliance Lead and the CPUC Project Manager. Appropriate corrective actions to resolve non-compliance events must be taken immediately; if the issue is not resolved immediately, the CPUC Project Manager would set a date for resolution. A construction activity that deviates from permit conditions or mitigation measures, particularly when the activity puts a resource at risk, would be considered a non-compliance. A Non-Compliance Notice may also be issued if a mitigation measure is not implemented according to the timing restrictions listed in the mitigation table. A Non-Compliance Resolution Report would be submitted to the CPUC Project Manager once corrective action is complete.

In the event of a repeated violation a mandatory tailgate training session would be scheduled by PG&E the following morning, which would be attended by the crew involved in the non-compliance situation, the PG&E Field Representatives, the PG&E Environmental Inspectors, and the CPUC Third Party EM, at minimum. If the non-compliance issue is not remedied, immediate

corrective actions would be implemented, including cessation of construction activities in the area, as appropriate. Immediate notification to the CPUC Project Manager is required for each repeated violation. In addition, the contractor and/or individuals may be held responsible for consequences due to environmental violations, including potential fines.

## All Levels

In determining the appropriate compliance level, PG&E Environmental Inspectors and the CPUC Third Party EM will consider the resource damage caused by the event (if any), the compliance history (e.g., a first offense versus a chronic compliance problem), and intent (e.g., an honest mistake versus a blatant disregard for environmental requirements).

## 3.2 Project Changes

At various times throughout the project, the need for extra workspace or additional access roads may be identified. Similarly, changes to the project requirements (e.g., mitigation measures, specifications, etc.) may be needed to facilitate construction or provide more effective protection of resources. Both CPUC and PG&E should work together to find solutions when variations or adjustments are necessary for specific field situations to avoid conflicts with adopted mitigation measures or specifications.

The CPUC Project Manager along with the CPUC Third Party EMs will ensure that any variance process or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements. No project variance will be approved by the CPUC if it creates new significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements, that does not increase the severity of an impact or create a new significant impact, and that clearly and strictly complies with the intent of the adopted mitigation measures.

A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, APMs, and correction of such deviation, will be reported immediately to the CPUC Third Party EM for their review. The CPUC Third Party EM will review the variance request to ensure that all of the information required to process the variance is included and then forward the request to the CPUC Project Manager for review and approval. The CPUC Project Manager may request a site visit from the CPUC Third Party EM or need additional information to process the variance. In some cases, a variance may also require approval by jurisdictional agencies. In general a variance request must include the following information:

- Detailed description of the location, including maps, photos, and/or other supporting documents;
- How the variance request deviates from a project requirement;

- Biological resource surveys or verification that no biological resources would be significantly impacted;
- Cultural resource surveys or verification that no cultural resources would be significantly impacted;
- Landowner approval if the location is not within PG&E's ROW or property; and
- Agency approval (if necessary).

A sample variance request form is included as Attachment D.

### **3.3 Records Management**

Inspection forms will be completed for each site visit and weekly status reports will be filed and used by the CPUC environmental monitor to prepare a final environmental compliance report following the completion of construction. The final report will provide a discussion on how each mitigation measure was implemented and include copies of submittals required for compliance. In addition, the success criteria will be evaluated and used for future projects.

### **3.4 Public Access to Records**

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available by the CPUC for public inspection upon request.



## CHAPTER 4

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# Mitigation Monitoring Program Tables

### 4.1 Using the Tables

Section 4.3, *Applicant Proposed Measures (APM) and Mitigation Measures*, lists the APMs and mitigation measures included in the Final IS/MND and the CPUC Decision dated January 27, 2011. The Mitigation Monitoring Program tables (Tables 4 and 5) are the core documentation for the environmental requirements of the project and will be the primary guideline for determining compliance with the MMRCP. A copy of the tables should be kept with each crew working on the project and all supervisory staff working on the project should be familiar with their contents.

### 4.2 Effectiveness Review

The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 2.3.5, *Dispute Resolution*. If in review, the Commission determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, then the Commission may impose additional reasonable conditions to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the Commission's rules and practices.

### 4.3 Applicant Proposed Measures (APMs) and Mitigation Measures

**TABLE 4  
APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<p>APM AES-1: Limit construction hours to daylight hours as feasible.</p>	<p>Construction activities that are visible to the public and scheduled to occur after 6:00 p.m. or on weekends should not continue past daylight hours (which vary according to season) unless required because of project safety concerns or clearance requirements. This will reduce the amount of construction activities visible to viewer groups because most construction activities will occur during business hours (when most viewer groups are likely at work), and daylight construction will eliminate the need to introduce high-wattage lighting sources to be able to operate in the dark.</p>
<p>APM AG-1: Compensate for reduced agricultural production and loss of use.</p>	<p>PG&amp;E will offer appropriate compensation for land held in private ownership as part of the acquisition of temporary construction easements or permanent utility easements. PG&amp;E will compensate property owners for removal of any structures, crops, or agriculture-related improvements required to construct the project. PG&amp;E will negotiate easements with private landowners for the temporary or permanent use of agricultural areas. Upon completion of the project, the areas will be left as specified in the individual agreements. In addition, PG&amp;E will prepare a SWPPP (see APM HYDRO 1 [Prepare and implement a Storm Water Pollution Prevention Plan] in Section 2.8, <i>Hydrology and Water Quality</i>) to ensure that areas affected by construction are restored to pre-construction conditions.</p>
<p>APM AIR-1: Implement Monterey Bay Unified Air Pollution Control District (MBUAPCD) mitigation measures for construction fugitive dust.</p>	<p>PG&amp;E will implement all applicable and feasible fugitive dust control measures required by MBUAPCD. This requirement will be incorporated into the construction contract. These measures include:</p> <ul style="list-style-type: none"> <li>• Water all active construction sites at least twice daily. Frequency of watering should be based on the type of operation, soil, and wind exposure.</li> <li>• Prohibit all grading activities during periods of high wind (over 15 mph).</li> <li>• Haul trucks will maintain at least 2'0" of freeboard.</li> <li>• On-site vehicles will be limited to a speed on unpaved roads that minimizes dust emissions.</li> <li>• Cover all trucks hauling dirt, sand, or loose materials.</li> <li>• Cover inactive storage piles.</li> <li>• Install wheel washers at the entrance to construction sites for all exiting trucks.</li> <li>• Sweep streets if visible soil material is carried out from the construction site.</li> <li>• Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person will respond and take corrective action within 48 hours. The phone number of the MBUAPCD also will be visible to ensure compliance with Rule 402 (Nuisance).</li> <li>• Limit the area under construction at any one time as feasible.</li> </ul>
<p>APM AIR-2: Implement BMPs to reduce construction tailpipe emissions.</p>	<p>PG&amp;E will implement all applicable and feasible measures to reduce tailpipe emissions from diesel-powered construction equipment. This requirement will be incorporated into the construction contract. These measures include:</p> <ul style="list-style-type: none"> <li>• Maximize use of diesel construction equipment meeting CARB's 1996 or newer certification standard for off-road heavy-duty diesel engines.</li> <li>• Use emission control devices at least as effective as the original factory-installed equipment.</li> <li>• Maintain all diesel-powered equipment in a manner to minimize visible soot emissions.</li> <li>• Locate stationary diesel-powered equipment and haul truck staging areas as far as practicable from sensitive receptors.</li> <li>• Minimize unnecessary idling time through application of a "common sense" approach to vehicle use, so that idling is reduced as far as possible below the maximum of 5 consecutive minutes required by California law—if a vehicle is not required immediately or continuously for construction activities, its engines will be shut off. Construction foremen will include briefings to crews on vehicle use as part of pre-construction conferences. Those briefings will include discussion of a "common sense" approach to vehicle use.</li> <li>• Use ground equipment in place of helicopters where practicable.</li> </ul>

**TABLE 4 (Continued)**  
**APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<p>APM AIR-3: Minimize greenhouse gas emissions during construction.</p>	<p>PG&amp;E or its contractors will implement the following measures during construction to reduce greenhouse gas emissions:</p> <ul style="list-style-type: none"> <li>• Encourage construction workers carpooling to the job site to the extent feasible.</li> <li>• Encourage recycling of construction waste where feasible.</li> <li>• Minimize welding and cutting by using compression of mechanical applications where practical and within standards.</li> <li>• Encourage use of natural gas-powered vehicles for passenger cars and light-duty trucks where feasible and available.</li> <li>• Minimize construction equipment exhaust by using low-emission or electric construction equipment where feasible.</li> </ul>
<p>APM BIO-1: Conduct an environmental training and monitoring program for construction crews before beginning construction.</p>	<p>An Environmental Training and Monitoring Program for construction crews will be conducted before beginning construction and will be ongoing during construction activities for new crew members. The education program will include information about the federal and state Endangered Species Acts, the consequences for noncompliance with environmental laws, identification of special-status plant and wildlife species and wetland habitats, and review of mitigation measures. (Also see APM HYDRO-2 [Develop and implement a Spill Prevention Control and Countermeasure Plan], which requires communicating environmental concerns and appropriate work practices, including spill prevention, emergency response measures, and applicable BMPs, to all construction personnel in an Environmental Training and Monitoring Program.)</p>
<p>APM BIO-2: Restrict vehicles to established roadways and approved access routes and staging areas.</p>	<p>PG&amp;E will restrict vehicles to established roadways and approved access routes and staging areas.</p>
<p>APM BIO-3: Retain an environmental monitor onsite during construction activities near sensitive habitat.</p>	<p>An environmental monitor will be onsite during any construction activity near sensitive habitat to ensure implementation of, and compliance with, APMs. The monitor will have authority to stop construction activities and develop alternative work practices, in consultation with construction personnel and resources agencies, if construction activities are likely to impact special-status species or other sensitive biological resources.</p>
<p>APM BIO-4: Set back staging areas from waterbodies to avoid impacts on riparian habitat.</p>	<p>Staging areas will be set back at least 50 feet from streams, creeks, or other water bodies to avoid impacts on riparian habitat.</p>
<p>APM BIO-5: Contact the environmental monitor if special-status species are located.</p>	<p>If construction personnel observe special-status species within the work area prior to, or during construction activities, construction personnel will contact the environmental monitor. The monitor will notify PG&amp;E contacts via an established communication protocol that will be developed prior to the start of construction. The USFWS Biological Opinion will state agency notification protocols should a federally-listed species be observed within the work area.</p>
<p>APM BIO-6: Complete photodocumentation of sensitive habitat conditions before beginning and immediately after completing construction activities.</p>	<p>Photodocumentation of preconstruction habitat conditions will occur at all construction locations within sensitive habitats prior to the start of construction and immediately after completing construction activities.</p>
<p>APM BIO-7: Prohibit trash, firearms, and pets in the project area during construction.</p>	<p>Additional APMs (identified below) to avoid and minimize specific potential impacts to biological resources will be implemented as necessary to reduce potentially significant impacts. In some cases, conducting preconstruction surveys to determine the presence or absence of special-status plant and wildlife species within the project area and subsequent avoidance of identified resources will avoid significant impacts. Due to the extent of the project, however, specific project components—such as grading new access roads and digging new tower footings—will affect areas where the presence of special-status species is presumed based on occurrence of suitable habitat, CNDDDB occurrences in relation to the project area, or results of prior biological resource assessment surveys.</p>

**TABLE 4 (Continued)  
APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<b>APM BIO-8: Restore upland and riparian habitat types temporarily disturbed during construction.</b>	Following construction, PG&E will restore upland and riparian habitat types temporarily disturbed during construction. As part of a Habitat Mitigation Plan (HMP) developed for the project, a list of specific actions necessary to restore habitats disturbed onsite will be prepared by a qualified biologist prior to construction. While some habitats in the project area may require minimal restoration actions, such as restoration of the topography and topsoil following construction, the HMP will detail the specific measures necessary for each habitat and area disturbed to ensure that the functions and values of the disturbed habitat are restored.
<b>APM BIO-9: Implement sudden oak death preventative measures when trimming or removing oak trees.</b>	PG&E will implement BMPs to control the potential introduction or spread of sudden oak death when trimming or removing trees as part of the project. At a minimum, the BMPs will include the following measures: <ul style="list-style-type: none"> <li>• All debris from host species (wood, branches, and chips) shall be left onsite following trimming.</li> <li>• All tools used to perform the work shall be disinfected before leaving infested areas.</li> </ul>
<b>APM BIO-10: Avoid impacts to protected trees, track protected trees removed during construction, and mitigate for impacts to protected trees.</b>	PG&E will avoid impacts to protected trees to the extent feasible. If avoidance is not feasible, PG&E will track the trees removed, including their species and size, and will replace protected trees as stipulated in applicable local regulations. To avoid removal of active nests, tree trimming, vegetation removal, and removal of towers should be conducted during the non-breeding season (August 16–March 1).
<b>APM BIO-11: Implement general protection measures for waters of the United States.</b>	During construction, PG&E will implement the following measures to minimize or avoid impacts on waters of the United States: <ul style="list-style-type: none"> <li>• Establish exclusion zones and minimize the amount of area disturbed to the minimum amount necessary to complete the work. Align work areas to avoid wetland areas and margins as much as feasible.</li> <li>• Delineate wetland areas, and restrict construction personnel and equipment from entering fenced protected areas.</li> <li>• Conduct all fueling of vehicles, equipment, and helicopters at least 100 feet from wetlands and other waterbodies.</li> <li>• To the extent feasible, complete road construction adjacent or within waters of the United States during the dry season. If it is not feasible to complete road construction work during the dry season, PG&amp;E will use appropriate erosion control measures for the site that will be identified in the SWPPP (see APM HYDRO-1 in Section 4.8).</li> </ul>
<b>APM BIO-12: Develop a wetlands mitigation plan.</b>	PG&E will develop a wetlands mitigation plan to offset effects to waters of the United States, including wetlands. The plan will be developed in consultation with the Corps and will include, at a minimum, plans for restoration of any temporarily disturbed wetlands and other waters of the United States and methods to achieve mitigation for permanent impacts at a minimum ratio of 1:1. Mitigation may include onsite restoration and improvement of existing wetlands or other offsite compensation.
<b>APM BIO-13: Complete spring surveys for special-status plants in all unsurveyed disturbance areas.</b>	Prior to construction, a qualified botanist will complete spring surveys for special-status plants at all unsurveyed staging areas, helicopter landing areas, and new access roads to determine the presence or absence of special-status plants. The surveys should be completed by qualified botanists and should be conducted during the appropriate period(s) necessary to observe special-status plants known to occur in the region.
<b>APM BIO-14: Avoid impacts on special-status plants.</b>	PG&E will, under the direction of a qualified botanist and to the extent possible, adjust the location of staging areas, pull sites, helicopter landing areas, access roads, and other project components to completely avoid impacts on Pajaro manzanita and other special-status plants that are discovered prior to or during construction. If this avoidance measure is not feasible, PG&E will implement APM BIO-15 (Minimize impacts on special-status plants) and APM BIO-16 (Restore habitat for special status plants disturbed during construction).

**TABLE 4 (Continued)**  
**APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<b>APM BIO-15: Minimize impacts on special-status plants.</b>	<p>Avoidance areas will be clearly staked and flagged in the field by a qualified botanist prior to construction. If Pajaro manzanita and other special-status plants cannot be avoided during construction, PG&amp;E will minimize impacts by reducing the work area to the smallest area necessary to complete the work. Where temporary disturbance is necessary, PG&amp;E will conduct project activities and necessary ground disturbance in a manner that is consistent with the successful reestablishment of the species to the extent feasible. The specific actions necessary will depend on the biology of the species in question; however, the actions will be designed to ensure successful reestablishment of the species following temporary disturbance. As part of an HMP, a list of specific actions will be prepared by a qualified botanist prior to construction that will include onsite restoration actions, or reseeding plans specific to any impacted construction areas (described below in APM BIO-16).</p> <p>To minimize impacts to Pajaro manzanita, which is already known to occur in the project area, PG&amp;E will implement the following measures:</p> <ul style="list-style-type: none"> <li>• Vegetation clearing in occupied Pajaro manzanita habitat should be conducted after Pajaro manzanita has set seed and before flowering begins (typically between May and November).</li> <li>• If mechanical brushing is conducted in occupied Pajaro manzanita habitat, mastication implements should not come within 6 inches of the ground surface to avoid disturbing the seed bank.</li> <li>• Where feasible, removal of entire Pajaro manzanita plants from the ground should be avoided.</li> </ul> <p>The Environmental Training and Monitoring Program (see APM BIO-1) will also include information on the location of special-status plants in the project area and the measures that will be implemented to avoid or minimize impacts on the plants.</p>
<b>APM BIO-16: Restore habitat for special-status plants disturbed during construction.</b>	<p>If impacts on special status plants are unavoidable, PG&amp;E will develop a special-status plant restoration plan as part of the HMP and in consultation with CDFG. The specific actions necessary will depend on the biology of the species in question and the type of impact (i.e., temporary or permanent); however, the actions will be designed to ensure successful reestablishment of the species following disturbance. The plan will be prepared by a qualified botanist prior to construction and will indicate when and where the actions will be implemented during construction.</p>
<b>APM BIO-17: Implement management practices to control the introduction and spread of invasive plants.</b>	<p>Prior to construction, PG&amp;E will identify the location of noxious weed species of concern within areas that will be disturbed as part of the project. Appropriate management practices will be designed by a botanist and implemented during construction to reduce the likelihood of spreading already established weeds into new areas or increasing their abundance, and of introducing new weed species to the project area. Actions to prevent noxious weed establishment will be described within the HMP and will be consistent with PG&amp;E's draft Invasive Plant Management Strategy. The project SWPPP will include BMPs such as using construction equipment that has been cleaned of soil and plant parts, including seeds, before entering the project area and using weed-free straw for erosion control. Disturbed areas will be revegetated with appropriate locally based native seed mixes. Implementing the management practices described above will reduce potentially significant impacts related to non-native invasive plants to a less-than-significant level.</p>
<b>APM BIO-18: Implement avoidance and mitigation measures outlined in the USFWS biological opinion for California red-legged frog and California tiger salamander.</b>	<p>USFWS will specify avoidance and mitigation measures to minimize impacts to California red-legged frogs and California tiger salamanders in the biological opinion they will draft for the project. PG&amp;E will follow and implement the measures that are outlined in the biological opinion.</p>
<b>APM BIO-19: Compensate for permanent impacts on California red-legged frog and California tiger salamander upland habitat.</b>	<p>It was determined that the project would result in permanent impacts to suitable upland habitat for California red-legged frogs and California tiger salamanders. To compensate for anticipated permanent impacts to suitable upland habitat for California red-legged frogs and California tiger salamanders, PG&amp;E may preserve additional upland habitat within a USFWS-approved conservation area; specific actions will be determined in coordination with USFWS. The ratio of compensation, specific mitigation acreages, and location of the conservation area will be determined through formal consultation with USFWS.</p>

**TABLE 4 (Continued)  
APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<b>APM BIO-20: Conduct tree trimming, vegetation removal, and, if possible, tower removal during the non-breeding season.</b>	To avoid removal of active nests, tree trimming, vegetation removal, and removal of towers should be conducted during the non-breeding season (August 16–March 1). If this is not possible, APM BIO-21 will be implemented.
<b>APM BIO-21: Conduct preconstruction surveys for nesting migratory birds and raptors, and develop an Avian Protection Plan.</b>	Construction activities are anticipated to occur mainly during the nesting season for migratory birds and raptors (generally early February through early August) (Avian Power Line Interaction Committee and USFWS, 2005). PG&E will retain a qualified wildlife biologist to conduct preconstruction surveys for nesting birds, for all construction activities that occur within or near suitable breeding habitat. The surveys will be staggered so that they are conducted no more than 1 week prior to the start of construction activities in any one area. Surveys will include the power line route, staging areas, pull sites, and areas of access road improvements where ground disturbance or vegetation clearing is required, at a frequency and timing appropriate for nest detection. If no active nests are detected, no additional mitigation measures are required. PG&E will develop a project-specific Avian Protection Plan that will outline protection measures for nesting migratory birds and raptors, in the event that nesting migratory birds or raptors are identified in areas where construction activities will occur during preconstruction surveys.
<b>APM BIO-22: Avoid disturbance of active nests by helicopter use.</b>	Use of helicopters will be restricted to necessary trips to install and remove towers and poles, install power lines, and deliver and remove equipment to areas lacking vehicle access. Helicopter flight paths will be designed to minimize impacts to nests, and buffers of active nests may be greater than those stated above to avoid helicopter disturbance of active nests identified in preconstruction surveys of the project sites. If active nests occur under planned helicopter flight paths, especially those near landing areas, coordination with CDFG will be required to determine whether modification of the flight path is necessary to avoid disturbance of active nests.
<b>APM BIO-23: Conduct preconstruction surveys for active burrowing owl burrows.</b>	CDFG (1995) recommends that preconstruction surveys be conducted in suitable habitat in the project study area (Exhibit 1) and in a 250 foot-wide buffer zone around the construction site to locate active burrowing owl burrows. PG&E will retain a qualified biologist to conduct preconstruction surveys for active burrows according to the CDFG guidelines. The surveys will include a nesting season survey and a wintering season survey, which is the season immediately preceding construction. The surveys will cover all affected areas, including the power line route, staging areas, pull sites, and areas of access road improvements where ground disturbance is required. If no burrowing owls are detected, no further mitigation is required. If active burrowing owl burrows are detected, PG&E will implement APM BIO-24 (Implement CDFG guidelines for burrowing owl mitigation, if necessary).
<b>APM BIO-24: Implement CDFG (1995) guidelines for burrowing owl mitigation, if necessary.</b>	Disturbance of occupied burrows will be avoided to the maximum extent feasible. Disturbance is generally defined as activities occurring within 250 feet of active burrowing owl nesting pairs during the breeding season (February 1 through August 31), or within 160 feet of occupied burrows in the non-breeding season (September 1–January 31).  During the non-breeding season, if direct impacts to an occupied burrow are unavoidable, passive relocation techniques may be considered after all other alternatives have been exhausted. Relocation may involve installing one-way doors at occupied burrow entrances and ensuring that alternative suitable burrows are available. Any relocation effort will be implemented in coordination with CDFG and in accordance with standard burrowing owl guidelines. Any burrowing owl exclusion process will be coordinated by a biologist with prior burrowing owl relocation experience.  PG&E will support site-specific mitigation measures for any burrowing owls with potential to be impacted by construction activities. Measures may include onsite burrow enhancement or artificial burrow installation, in coordination with CDFG. In the event that a site-specific burrowing owl relocation is implemented, PG&E will consult with CDFG regarding suitable replacement of foraging and burrow habitat.

**TABLE 4 (Continued)**  
**APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<b>APM BIO-25: Implement avoidance and mitigation measures outlined in the USFWS biological opinion for San Joaquin kit fox.</b>	USFWS will specify avoidance and mitigation measures to minimize impacts on San Joaquin kit foxes in the biological opinion they will draft for the project. PG&E will follow and implement the measures outlined in the biological opinion.
<b>APM CR-1: Implement construction monitoring.</b>	An archaeologist that meets the Secretary of the Interior's Standards and Guidelines for professional archaeologists will monitor ground-disturbing activities in areas that were documented as having high archaeological sensitivity on Figures 2a through 2d of the Historic Properties Inventory Report (ICF 2010). The monitor will be empowered to temporarily halt construction in the immediate vicinity of a discovery while it is evaluated for significance. With the archaeologist's approval, work may continue on other portions of the site. If the discovery proves to be significant, additional measures will be implemented; these may include avoidance, capping beneath a layer of sterile soil, or data recovery through archaeological excavation (PRC 21083).
<b>APM CR-2: Stop work if previously unknown cultural resources are discovered.</b>	If buried cultural resources such as chipped or ground stone, historic debris, or building foundations are inadvertently discovered during site preparation or construction activities, work will stop in that area and within 100 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with PG&E and other appropriate agencies. With the archaeologist's approval, work may continue on other portions of the site. PG&E will be responsible for ensuring that the archaeologist's recommendations for treatment are implemented.
<b>APM CR-3: Stop work if human remains are discovered.</b>	If human remains are encountered during any phase of construction, work within a 100-foot radius of the remains will be suspended immediately and PG&E and/or their representative will immediately notify the respective county coroner, as required by state law (California Health and Safety Code 7050.5) and County Ordinance No. B6-18. If the remains are determined by the coroner to be Native American, the Native American Heritage Commission (NAHC) will be notified within 24 hours, and the NAHC will in turn immediately notify the Most Likely Descendent, pursuant to Section 5097.98 of the State Resources Code. Upon notification, the MLD has 48 hours to make recommendations as to the treatment or disposition of the remains. PG&E or its appointed representative will implement any mitigation before the resumption of activities at the site where the remains were discovered.
<b>APM GEO-1: Perform Site-Specific Geologic Studies at Active Fault Crossings and Modify Siting/Design as Feasible to Reduce Damage.</b>	For all pole or tower replacements proposed within a State-designated Earthquake Fault Zone or within 500 feet on either side of a fault considered likely to be active but not zoned by the State, PG&E will perform site-specific geologic investigations with the purpose of locating any active fault trace(s) and ensuring that project facilities are sited and designed to avoid and reduce damage due to surface fault rupture. Studies may include any appropriate combination of literature research, air photo evaluation, reconnaissance field survey, and/or subsurface investigation (fault trenching), based on the professional judgment of licensed supervising personnel (California Professional Geologist or Certified Engineering Geologist). Where significant potential for damage due to surface fault rupture is identified, facilities siting and design will be modified to the extent feasible to avoid or reduce damage.
<b>APM HAZ-1: Stop work if hazardous substances are encountered during construction.</b>	If hazardous substances are unexpectedly encountered during trenching, grading, or excavating work, work will be stopped until the material is properly characterized and appropriate measures are taken to protect human health and the environment. If excavation of hazardous materials is required, the materials will be handled, transported, and disposed of in accordance with federal, state, and local regulations.
<b>APM HAZ-2: Conduct groundwater sampling and testing if suspected contaminated groundwater is encountered during construction.</b>	If suspected contaminated groundwater is encountered in the proposed project construction areas, samples will be collected and submitted for analysis of petroleum hydrocarbons, metals, volatile organic compounds, and semi-volatile organic compounds. If necessary, groundwater will be collected during construction, contained, and disposed of in accordance with all applicable regulations.

**TABLE 4 (Continued)  
APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<b>APM HAZ-3: Develop and implement a Helicopter Lift Plan.</b>	PG&E will require the helicopter vendor to prepare a Helicopter Lift Plan for approval by the FAA prior to any construction helicopter operations. Any specific transportation needs (e.g., temporary road closures) will be identified in the plan and will be coordinated with the appropriate jurisdictions.
<b>APM HAZ-4: Develop and implement a Fire Risk Management Plan.</b>	PG&E follows a standard practice of developing and implementing a Fire Risk Management Plan that addresses fire-suppression equipment and procedures to be used during construction and training of construction and maintenance crews. Additionally, fire suppression equipment and materials will be kept adjacent to all areas of work and in staging areas, and will be clearly marked. Detailed information for responding to fires will be provided in the project's Fire Risk Management Plan. Information contained in the plan and the locations of fire-suppression materials and equipment will be included in the employee environmental training discussed in APM BIO-1.
<b>APM HYDRO-1: Prepare and Implement a Storm Water Pollution Prevention Plan.</b>	<p>PG&amp;E or its contractor will prepare and implement a SWPPP to prevent construction-related erosion and sediments from entering nearby waterways. The SWPPP will include a list of BMPs to be implemented in areas with potential to drain to tributaries of the Salinas River in Monterey County or to the San Benito River in San Benito County. These BMPs will be selected to achieve maximum sediment removal and represent the best available technology that is economically achievable. BMPs to be implemented as part of the project-specific SWPPP may include, but are not limited to, the following control measures:</p> <ul style="list-style-type: none"> <li>• Temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, grass buffer strips, high infiltration substrates, grassy swales, and temporary revegetation or other ground cover) will be employed to control erosion from disturbed areas.</li> <li>• Drainage facilities in downstream offsite areas will be protected from sediment using BMPs consistent with CCRWQCB requirements.</li> <li>• Vegetative cover will be established on the disturbed areas as soon as possible after disturbance.</li> </ul>
<b>APM HYDRO-2: Develop and implement a Spill Prevention Control and Countermeasure Plan.</b>	<p>PG&amp;E or its contractor will develop and implement an SPCCP to minimize the potential for, and effects of, spills of hazardous, toxic, or petroleum substances during all construction activities. The SPCCP will be completed and included in the SWPPP before any construction activities begin. PG&amp;E will routinely inspect the construction areas to verify that the control measures specified in the SPCCP are properly implemented and maintained. PG&amp;E will notify its contractors immediately if there is a noncompliance issue and will require compliance.</p> <p>If an appreciable spill has occurred, a detailed analysis will be performed by a Registered Environmental Assessor to identify the likely cause of contamination. This analysis will conform to American Society for Testing and Materials (ASTM) standards and will include recommendations for reducing or eliminating the source or mechanisms of contamination. Based on this analysis, PG&amp;E and its contractors will select and implement additional measures to control contamination, with a performance standard that groundwater quality and surface water quality must be returned to baseline conditions.</p>
<b>APM HYDRO-3: Perform a drainage study and implement a drainage plan.</b>	A drainage study will be performed for any area that crosses a waterway and requires a conveyance structure (culvert) for grading of new construction maintenance roads. The study will include calculations for the potential increases in stormwater runoff from related construction activities. The study also will identify critical drainage paths, and PG&E will implement drainage improvements to minimize the risk of flooding to downstream areas. The drainage plan will require that PG&E or its contractor will be responsible for proper maintenance of the drainages and any BMP associated with each drainage. Implementation of these measures will ensure that altered drainage patterns from project-related construction activities do not significantly affect erosion or sedimentation.

**TABLE 4 (Continued)**  
**APPLICANT PROPOSED MEASURES (APMs)**

APM Number and Title	Description
<b>APM NOI-1: Implement noise control measures.</b>	<p>PG&amp;E will implement the following noise abatement measures during project construction to minimize the impact of temporary construction-related noise on nearby residences:</p> <p>Notify residents near future construction zones regarding the forecast schedule for nearby construction and provide project contact information.</p> <ul style="list-style-type: none"> <li>• Comply with manufacturers' muffler requirements on all construction equipment engines.</li> <li>• Turn off construction equipment when not in use, where applicable.</li> <li>• Minimize equipment use.</li> <li>• Use equipment fitted with factory-installed muffling devices during construction when readily available.</li> <li>• Route truck traffic away from residential areas where feasible.</li> </ul>
<b>APM NOI-2: Implement noise control measures for helicopter noise.</b>	<p>PG&amp;E will implement the following BMPs during project construction to minimize the impact of temporary construction-related noise generated by helicopters:</p> <ul style="list-style-type: none"> <li>• Notify residents near future construction zones and along helicopter flight paths regarding the schedule and reasons for upcoming construction and flight operations.</li> <li>• Provide project contact information to facilitate response to noise complaints during the construction activity.</li> <li>• To the extent feasible, plan helicopter flight paths between construction zones and the helicopter staging areas to avoid noise-sensitive receivers. Note: All flight operations including takeoff, landing, and flight paths must comply with FAA regulations and all applicable safety concerns.</li> </ul>
<b>APM PUB-1: Maintain Secured Facilities during construction activities.</b>	<p>PG&amp;E will implement the following measures during construction activities:</p> <ul style="list-style-type: none"> <li>• All equipment will be locked and secured when left unattended at the most secure locations available;</li> <li>• Contract security will be used at active pull/tension sites, laydown, and storage areas outside work hours;</li> <li>• All open holes will be covered and secured once activity at that location stops (after hours);</li> <li>• Anchor bolts on foundations without structures will be capped; and</li> <li>• Safety structures will be placed at road crossings during overhead wire installation activity to protect traffic and pedestrians.</li> </ul>
<b>APM REC-1: Avoid Disruption of Recreational Facilities along the Juan Bautista de Anza National Historic Trail during Peak Use.</b>	<p>PG&amp;E will limit construction activities that occur in the immediate vicinity of the Juan Bautista de Anza National Historic Trail to weekdays or as otherwise permitted by the National Park Service. PG&amp;E will ensure that the trail is fully accessible on the weekends, as well as any holidays observed by the National Park Service.</p>
<b>APM PU-1: Conduct a pre-construction records search/field survey to identify specific locations of water wells and well fields.</b>	<p>To ensure minimal disturbance or alteration of water wells or well fields within the project alignment, PG&amp;E will conduct a pre-construction records search and field survey to identify specific locations of water wells and well fields.</p>
<b>APM PU-2: Notify Underground Service Alert at least two days prior to initiation of construction activities in the underground portion of the power line.</b>	<p>PG&amp;E will ensure that Underground Service Alert is notified at least two days prior to initiation of construction activities of the underground portion of the power line. Underground Service Alert verifies and physically marks the location of all existing underground utilities in the area of anticipated construction activities to prevent accidental disturbance.</p>

**TABLE 5  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Aesthetics</b>				
<b>Light and Glare</b>	<p><b>Mitigation Measure 3.1-1:</b> Reduce construction night lighting impacts. PG&amp;E shall design and install all lighting at construction and storage yards and staging areas such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the project facilities, vicinity, and nighttime sky is minimized. PG&amp;E shall submit a <i>Construction Lighting Mitigation Plan</i> to the CPUC for review and approval at least 90 days prior to the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. PG&amp;E shall not install or operate any exterior lighting fixtures or lighting components for the Proposed Project until the <i>Construction Lighting Mitigation Plan</i> is approved by the CPUC. The Plan shall include but is not limited to the following measures:</p> <ul style="list-style-type: none"> <li>Lighting shall be designed so exterior lighting is hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary.</li> <li>All lighting shall be of minimum necessary brightness consistent with worker safety.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit Construction Lighting Mitigation Plan to CPUC for review.</p> <p>CPUC Third Party Environmental Monitor to inspect compliance.</p>	<p>Submit plan to CPUC at least 90 days prior to commencement of construction activities or the ordering of any exterior lighting fixtures or components, whichever comes first.</p> <p>During all phases of construction activities.</p>
<b>Agriculture and Forestry Resources</b>				
No mitigation required.				
<b>Air Quality and Greenhouse Gas Emissions</b>				
No mitigation required.				
<b>Biological Resources</b>				
<p><b>Special-Status Species: California tiger salamander and California red-legged frog</b></p>	<p><b>Mitigation Measure 3.4-1:</b> PG&amp;E and/or its contractors shall implement the following measures for construction areas and maintenance areas located in suitable habitat:</p> <ul style="list-style-type: none"> <li>The project will avoid direct impacts to sensitive wetlands areas and minimize disturbances to wetland and riparian corridors, wherever possible. Ground disturbance and construction footprints shall be minimized to the greatest degree feasible.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit to the CPUC for review survey results and, if applicable, documentation showing CDFG consultation.</p> <p>CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>Submit documentation to CPUC prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Biological Resources (cont.)</b></p> <p><b>Special-Status Species: California tiger salamander and California red-legged frog (cont.)</b></p>	<ul style="list-style-type: none"> <li>Work activities within or adjacent to suitable habitat will be completed between April 15 and October 31, when possible.</li> <li>If construction activities must occur during the wet season in sensitive habitat(s) or adjacent to sensitive plant or wildlife resources, the perimeter of pull sites, staging areas, landing zones, shoo-fly lines, and other active construction areas shall be fenced by October 15 with amphibian exclusion fencing. All amphibian environmental monitor or designated construction personnel daily to ensure that it is (1) functional; and (2) that wildlife, particularly amphibians or reptiles, are not congregating along the fence perimeter.</li> <li>All erosion control and landscaping specifications shall be restricted to natural-fiber, biodegradable meshes and coir rolls.</li> <li>A qualified biological resource monitor will conduct worker awareness training for construction personnel, addressing the species' basic biology and identifying characteristics, legal status, job-specific protection measures, and penalties for non compliance.</li> <li>A preconstruction survey will be conducted each day by an onsite monitor immediately preceding construction activity that occurs within or adjacent to suitable habitat.</li> <li>Suitable habitat that is temporarily impacted by project-related activities will be restored to pre-project conditions.</li> <li>Temporary impacts to upland habitat will be compensated at a 0.5:1 ratio (i.e., restoration of temporarily disturbed areas, plus permanent conservation of an additional area at a 0.5:1 ratio) and permanent impacts to upland and aquatic habitat will be compensated at a 3:1 ratio or at ratios as prescribed by the U.S. Fish and Wildlife Service and California Department of Fish and Game. Mitigation shall be provided on-site through habitat enhancement and preservation, or through an alternative arrangement with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG). No agency-approved mitigation banks currently service the</li> </ul>			

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Biological Resources (cont.)</b>				
<p><b>Special-Status Species:</b> <b>California tiger salamander and California red-legged frog (cont.)</b></p>	<p>Proposed Project area; therefore, if an approved bank is not established prior to Proposed Project construction that can service mitigation needs for the Proposed Project, then at the discretion of the USFWS and CDFG funds may be (a) set aside in escrow toward the establishment of a regional California tiger salamander mitigation bank, or (b) paid to establish a California tiger salamander conservation program locally or in another region, for the purpose of acquiring suitable habitat.</p>			
<p><b>Special-Status Species:</b> <b>Western pond turtle</b></p>	<p><b>Mitigation Measure 3.4-2:</b> PG&amp;E and/or its contractors shall implement the following measures for construction areas located in suitable habitat within 0.3 mile of aquatic features:</p> <ul style="list-style-type: none"> <li>• Include western pond turtle in the Environmental Training and Monitoring Program.</li> <li>• Before daily activities begin near areas of suitable habitat, the onsite monitor shall perform pond turtle surveys within suitable aquatic and upland habitat. Any pond turtles located within the construction area would be relocated to the nearest safe location.</li> <li>• To minimize the likelihood of encountering turtles in upland areas near stream crossings, construction footprints shall be restricted to the smallest area possible.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to survey daily and conduct relocation of turtle, if necessary. CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>During all phases of construction activities.</p>
<p><b>Special-Status Species:</b> <b>American badger</b></p>	<p><b>Mitigation Measure 3.4-3:</b> PG&amp;E and/or its contractors shall implement the following measures for construction areas located in grasslands that provide potential habitat for American badger:</p> <ul style="list-style-type: none"> <li>• Include American badger in the Environmental Training and Monitoring Program.</li> <li>• Preconstruction surveys shall be conducted within 200 feet of work areas to identify potential maternal badger dens or other refugia in and surrounding work areas. A qualified biologist shall conduct the survey 14 to 30 days before construction begins. PG&amp;E shall use the same methods for determining vacated badger burrows as implemented for San Joaquin kit fox (see Mitigation Measure 3.4-4). If no evidence of badger presence is detected, no further mitigation is required.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit to the CPUC for review survey results and, if applicable, documentation showing CDFG consultation. CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>Submit documentation to CPUC prior to commencement of construction activities.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Biological Resources (cont.)</b></p> <p><b>Special-Status Species: American badger (cont.)</b></p>	<ul style="list-style-type: none"> <li>Suitable, as determined by the Environmental Monitor, vacated burrows that are located within the work area and that will not be destroyed by construction activities will be temporarily covered using plywood sheets or other similar material to prevent badgers from occupying the burrows within the work areas.</li> <li>If active, non-maternal dens are located, badgers will be passively relocated via installation of one-way doors.</li> <li>If active maternal dens are located, the den will be avoided during construction by establishment of a 100-foot buffer. Smaller buffers, if required for construction, would be established in coordination with CDFG.</li> </ul>			
<p><b>Special-Status Species: San Joaquin kit fox</b></p>	<p><b>Mitigation Measure 3.4-4:</b> PG&amp;E and/or its contractors shall implement the following San Joaquin kit fox protection measures for construction areas located in grasslands and agricultural lands that provide potential habitat for San Joaquin kit fox.</p> <ul style="list-style-type: none"> <li>Preconstruction surveys shall be conducted within 200 feet of work areas to identify potential San Joaquin kit fox dens or other refugia in and surrounding work areas. A qualified biologist shall conduct the survey 14 to 30 days before construction begins. All potential dens shall be monitored for evidence of kit fox use by placing an inert tracking medium at den entrances and monitoring for at least three consecutive nights. If no activity is detected at these sites, they may be closed following guidance established in the 1999 USFWS Standardized Recommendations for Protection of the San Joaquin Kit Fox.</li> <li>If kit fox occupancy is determined at a given site, den closure activities shall immediately be halted and the USFWS contacted. Depending on the den type, reasonable and prudent measures to avoid effects to kit fox could include seasonal limitations on project construction at the site (i.e., restricting the construction period to avoid spring-summer pupping season), and/or establishing a construction exclusion zone around the identified site, or resurveying the den a week later to determine species presence or absence.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit to CPUC for review survey results and, if applicable, documentation showing USFWS consultation.</p> <p>CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>Submit documentation to CPUC prior to commencement of construction activities.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Biological Resources (cont.)</b></p> <p><b>Special-Status Species:</b> <b>San Joaquin kit fox</b> (cont.)</p>	<ul style="list-style-type: none"> <li>To minimize the possibility of inadvertent kit fox mortality, project-related vehicles shall observe a maximum 20 miles per hour speed limit on private roads in kit fox habitat. Nighttime vehicle traffic shall be kept to a minimum on nonmaintained roads. Off-road traffic outside the designated project area shall be prohibited in areas of kit fox habitat.</li> <li>To prevent accidental entrapment of kit fox or other animals during construction, all excavated holes or trenches greater than two feet deep shall be covered at the end of each work day by suitable materials, or escape routes constructed of earthen materials or wooden planks shall be provided. Before filling, such holes shall be thoroughly inspected for trapped animals. All pipes, culverts, or similar structures with a diameter of 4 inches or greater must be capped at both ends while not in use, and otherwise inspected for kit fox presence prior to relocation or use.</li> <li>All food-related trash items (such as wrappers, cans, bottles, and food scraps) shall be disposed of in closed containers and removed daily from the project area.</li> <li>To prevent harassment and mortality of kit foxes or destruction of their dens, no pets shall be allowed in the project area.</li> <li>Suitable habitat that is temporarily impacted by project-related activities will be restored to pre-project conditions.</li> <li>Temporary impacts will be compensated at a minimum of 0.5:1 ratio (i.e., restoration of temporarily disturbed areas, plus permanent conservation of an additional area at a 0.5:1 ratio) and permanent impacts will be compensated at a minimum 3:1 ratio or at ratios as prescribed by the U.S. Fish and Wildlife Service and California Department of Fish and Game. Compensation will be implemented by participating in the San Joaquin Kit Fox Conservation Fund, which is administered via trust by the Center for Natural Lands Management.</li> </ul>			

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Biological Resources (cont.)</b></p> <p><b>Special-Status Species: Raptors and Nesting Birds</b></p>	<p><b>Mitigation Measure 3.4-5:</b> PG&amp;E and/or its contractors shall implement the following measures for the protection of nesting birds and raptors:</p> <ul style="list-style-type: none"> <li>• Project design, construction, and maintenance will conform with PG&amp;E's corporate Avian Protection Plan and Avian Power Line Interaction Committee (APLIC) Guidelines.</li> <li>• A project-specific Avian Protection Plan would be developed and would include routine ground surveys by a qualified avian biologist, ground surveys staggered over time in concert with project implementation, additional ground surveys by a qualified environmental monitor, species-specific buffers, and a minimum 1,000-foot helicopter buffer for active eagle nests.</li> <li>• During the permitting process, the USFWS may identify the need for protocol surveys for least Bell's vireo.</li> <li>• If active nests are not identified during the preconstruction survey, no further action is required for breeding birds.</li> <li>• If active nests are identified during the preconstruction survey, the following measures, which shall be included in the project-specific Avian Protection Plan, will be implemented to avoid and minimize impacts.                             <ul style="list-style-type: none"> <li>– For golden eagle, construction contractors shall observe CDFG and USFWS avoidance guidelines, which stipulate a minimum 500-foot buffer zone around active golden eagle nests. Buffer zones of 50 feet for passerine birds and 250 feet for raptors other than golden eagles will be established or closer as needed with resources agency permission. Buffer zones shall remain until young have fledged.</li> <li>– Monitoring of the nest by a qualified biologist may be required if the project-related activity has potential to adversely impact the nest.</li> <li>– CDFG may, on a case-by-case basis, allow construction activities to continue even if raptors and passerine birds nest within the buffers of the work activities during the nesting season.</li> </ul> </li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit to the CPUC for review documentation demonstrating conformance with APLIC Guidelines and, if applicable, documentation showing USFWS and CDFG consultation.</p> <p>CPUC Third Party Environmental Monitor to inspect compliance.</p>	<p>Submit documentation to CPUC prior to commencement of construction activities.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Biological Resources (cont.)</b></p>	<ul style="list-style-type: none"> <li>For activities conducted with agency approval within a raptor-nesting buffer zone, a qualified biologist shall monitor construction activities and the nest(s) to monitor reactions to activities. If activities are deemed to have a negative effect on nesting raptors, the biologist shall immediately inform the construction manager that work should be halted, and CDFG and USFWS's Division of Migratory Birds shall be consulted. While the USFWS issues limited take permits for golden eagle, this species and certain other raptors are protected under the Bald and Golden Eagle Protection Act and fully-protected under California law.</li> <li>Following construction, PG&amp;E will comply with the PG&amp;E company-wide Avian Protection Plan.</li> </ul>			
<p><b>Riparian and Upland Habitat</b></p>	<p><b>Mitigation Measure 3.4-6:</b> PG&amp;E and/or its contractors shall implement the following measures for the protection and restoration of riparian and upland habitat:</p> <ul style="list-style-type: none"> <li>PG&amp;E shall complete a Habitat Management Plan to be approved by the resource agencies at least 4 weeks prior to construction in potential restoration areas.</li> <li>The Habitat Management Plan will include, at a minimum, quantifiable success criteria, contingency provisions, and follow-up monitoring responsibilities and schedules.</li> <li>Affected riparian and upland habitat shall be restored to pre-project conditions.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit Habitat Management Plan to CPUC and resource agencies for review.  CPUC Third Party Environmental Monitor to inspect compliance.</p>	<p>Submit plan to CPUC at least 4 weeks prior to construction in potential restoration areas.</p>
<p><b>Native Trees</b></p>	<p><b>Mitigation Measure 3.4-7:</b> PG&amp;E and/or its contractors shall implement the following additional measures for the protection and restoration of impacted native trees:</p> <ul style="list-style-type: none"> <li>The record of protected trees removed during construction and the associated plans for native tree replacement will be included in the Habitat Management Plan required under Mitigation Measure 3.4-6, above.</li> <li>For replacement trees, the Habitat Management Plan shall include, at a minimum, quantifiable success criteria, contingency provisions, and follow-up monitoring responsibilities and schedules.</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit Habitat Management Plan to CPUC and resource agencies for review.  CPUC Third Party Environmental Monitor to inspect compliance.</p>	<p>Submit plan to CPUC at least 4 weeks prior to construction in potential restoration areas.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Cultural Resources</b>				
<b>Paleontological Resources</b>	<p><b>Mitigation Measure 3.5-1:</b> Stop work if previously unknown paleontological resources are discovered. Prior to the start of any subsurface excavations (excluding pole and tower holes) that would extend into Pleistocene to Oligocene sedimentary rock units, all construction forepersons and field supervisors shall receive training by a qualified professional paleontologist, as defined by the SVP (1995), who is experienced in teaching non-specialists, to ensure they can recognize fossil materials and will follow proper notification procedures in the event any are uncovered during construction. Procedures to be conveyed to workers include halting construction within 50 feet of any potential fossil find and notifying a qualified paleontologist, who will evaluate its significance. Training on paleontological resources will also be provided to all other construction workers, but may involve using a videotape of the initial training and/or written materials rather than in-person training by a paleontologist. If a fossil is determined to be significant and avoidance is not feasible, the paleontologist will develop and implement an excavation and salvage plan in accordance with SVP standards (SVP, 1995; SVP, 1996).</p>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to suspend all work and contact CPUC if paleontological resources are discovered.</p> <p>If resource is significant, submit excavation and salvage plan to CPUC.</p> <p>CPUC Third Party Environmental monitor to monitor compliance.</p>	<p>During all phases of construction activities.</p>
<b>Geology, Soils, and Seismicity</b>				
No mitigation required.				
<b>Hazards and Hazardous Materials</b>				
<b>Hazardous Materials</b>	<p><b>Mitigation Measure 3.7-1:</b> PG&amp;E and/or its contractors shall implement construction best management practices, including but not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction;</li> <li>• Avoid overtopping construction equipment fuel gas tanks;</li> <li>• Use tarps and adsorbent pads under vehicles when refueling to contain and capture any spilled fuel;</li> <li>• During routine maintenance of construction equipment, properly contain and remove grease and oils;</li> <li>• Properly dispose of discarded containers of fuels and other chemicals; and</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>CPUC Third Party Environmental monitor to monitor compliance.</p>	<p>During all phases of construction activities.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Hazards and Hazardous Materials (cont.)</b>				
<b>Hazardous Materials (cont.)</b>	<ul style="list-style-type: none"> <li>If wood poles removed from the Hollister Pole Segment are not recycled or reused, they shall be disposed of at a landfill facility that is authorized to accept treated wood pole waste in accordance with HSC 25143.1 .4(b).</li> </ul>	PG&E and its contractors to implement measure as defined.	PG&E to submit Hazardous Substance Control and Emergency Response Plan to CPUC for review and approval.  CPUC Third Party Environmental Monitor to monitor compliance.	Submit plan to CPUC at prior to commencement of construction activities.  During all phases of construction activities.
	<p><b>Mitigation Measure 3.7-2:</b> PG&amp;E shall prepare a Hazardous Substance Control and Emergency Response Plan (Plan) and implement it during construction to ensure compliance with all applicable federal, State, and local laws and guidelines regarding the handling of hazardous materials. The Plan shall prescribe hazardous material handling procedures to reduce the potential for a spill during construction, or exposure of the workers or public to hazardous materials. The Plan shall also include a discussion of appropriate response actions in the event that hazardous materials are released or encountered during excavation activities. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.</p>	PG&E and its contractors to implement measure as defined.	PG&E to submit Health and Safety Plan to CPUC for review and approval.  CPUC Third Party Environmental Monitor to monitor compliance.	Submit plan to CPUC prior to commencement of construction activities.  During all phases of construction activities.
	<p><b>Mitigation Measure 3.7-3:</b> PG&amp;E shall prepare and implement a Health and Safety Plan to ensure the health and safety of construction workers and the public during construction. The plan shall include information on the appropriate personal protective equipment to be used during construction.</p>	PG&E and its contractors to implement measure as defined.	PG&E to submit Health and Safety Plan to CPUC for review and approval.  CPUC Third Party Environmental Monitor to monitor compliance.	Submit plan to CPUC prior to commencement of construction activities.  During all phases of construction activities.
	<p><b>Mitigation Measure 3.7-4:</b> PG&amp;E shall ensure that a Workers Environmental Awareness Program is established and implemented to communicate environmental concerns and appropriate work practices to all construction field personnel. The training program shall emphasize site-specific physical conditions to improve hazard prevention, and shall include a review of the Health and Safety Plan and the Hazardous Substance Control and Emergency Response Plan. The CPUC mitigation monitor shall attend the first training session. PG&amp;E shall submit documentation to the CPUC prior to the commencement of construction activities that each worker on the project has undergone this training program.</p>	PG&E and its contractors to implement measure as defined.	CPUC Third Party Environmental Monitor to attend the first program.  PG&E to submit copies of sign in sheets from training sessions.	Training to be completed prior to commencement of construction activities.  Submit sign-in sheets to CPUC prior to commencement of construction activities.

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Hazards and Hazardous Materials (cont.)</b>				
<b>Hazardous Materials (cont.)</b>	<b>Mitigation Measure 3.7-5:</b> PG&E shall ensure that oil-absorbent material, tarps, and storage drums shall be used to contain and control any minor releases. Emergency spill supplies and equipment shall be kept at the project staging area and adjacent to all areas of work, and shall be clearly marked. Detailed information for responding to accidental spills and for handling any resulting hazardous materials shall be provided in the project's Hazardous Substance Control and Emergency Response Plan (see Mitigation Measure 3.7-2), which shall be implemented during construction.	PG&E and its contractors to implement measure as defined.	CPUC Third Party Environmental Monitor to monitor compliance.	During all phases of construction activities.
<b>Protected Air Space</b>	<b>Mitigation Measure 3.7-6:</b> PG&E shall incorporate the Federal Aviation Administration (FAA) conditions outlined in FAA Aeronautical Studies 2009-AWP-1446-OE (FAA, 2009a) and 2009-AWP-1447-OE (FAA, 2009b), including: <ul style="list-style-type: none"> <li>• Poles 22/00 and 22/01 shall be marked or lighted in accordance with FAA Advisory circular 70/7460-1 K Change 2, Obstruction Marking and Lighting, red lights.</li> <li>• Notices of Actual Construction or Alternative, shall be completed and returned to the FAA within five days after the construction reaches its greatest height.</li> <li>• Poles 22/00 and 22/01 shall not exceed 82 feet above ground level (i.e., 381 feet above mean sea level).</li> </ul>	PG&E and its contractors to implement measure as defined.	PG&E to submit evidence of compliance with FAA regulations to CPUC.  CPUC Third Party Environmental Monitor to monitor compliance.	Submit compliance documentation to FAA within five days after construction of the Hollister Pole Segment reaches its greatest height.  During all phases of construction activities.
<b>Hydrology and Water Quality</b>				
<b>Water Quality</b>	<b>Mitigation Measure 3.8-1:</b> For all segments of new access roads that would be within 300 feet of an existing surface water channel and traverse a ground slope greater than two percent, the following protective measures shall be installed: <ul style="list-style-type: none"> <li>• Permanent access roads shall be in-sloped with a rock-lined ditch on the inboard side;</li> <li>• Water bars, or a similar drainage feature, shall be installed at 150 foot intervals (so as to reduce the effective, connected length of the access road to 150 feet).</li> </ul>	PG&E and its contractors to implement measure as defined.	CPUC Third Party Environmental Monitor to monitor compliance.	During all construction of all new access roads within 300 feet of an existing surface water channel and that traverse a ground slope greater than two percent.

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Hydrology and Water Quality(cont.)</b>				
<b>Drainage</b>	<p><b>Mitigation Measure 3.8-2:</b> The drainage study, as proposed by PG&amp;E in APM-HYDRO-3, shall provide sizing recommendations to ensure each culvert can pass a 10-year storm event without being submerged, and design recommendations to ensure that culvert installation would result in no net increase in erosion and sedimentation during peak flows. Sizing and design recommendations for each culvert shall consider the individual drainage characteristics of the stream (e.g., slope, watershed area, and substrate) and may include any combination of features necessary to achieve no net increase in erosion and sediment transport. Such features may include the following:</p> <ul style="list-style-type: none"> <li>• Downstream armoring with gravel or gabions, coupled with appropriate roughness features or characteristics, so as to dissipate and slow flows exiting the culvert and leaving the modified stream segment;</li> <li>• A wide culvert that retains the natural stream bed and roughness elements without notably increasing flow depth;</li> <li>• Design length and slope of culvert to maintain existing topography</li> </ul>	PG&E and its contractors to implement measure as defined.	<p>PG&amp;E to submit the drainage study to CPUC for review and approval.</p> <p>CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>Submit study to CPUC prior to commencement of construction activities associated with culvert installation.</p> <p>During all culvert-related construction activities.</p>
<b>Land Use and Planning</b>				
No mitigation required.				
<b>Mineral Resources</b>				
No mitigation required.				
<b>Noise</b>				
<b>Construction Noise</b>	<p><b>Mitigation Measure 3.11-1:</b> Construction activity shall be limited to between the hours of seven a.m. and seven p.m., Monday through Saturday, except with CPUC approval or where necessary to ensure worker safety.</p>	PG&E and its contractors to implement measure as defined.	CPUC Third Party Environmental Monitor to monitor compliance.	During all phases of construction activities.
	<p><b>Mitigation Measure 3.11-2:</b> PG&amp;E and/or its contractors shall shield compressors and other small stationary construction equipment with portable barriers when operating within 100 feet of residences.</p>	PG&E and its contractors to implement measure as defined.	CPUC Third Party Environmental Monitor to monitor compliance.	During all phases of construction activities.

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise (cont.)	<p><b>Construction Noise (cont.)</b></p> <p><b>Mitigation Measure 3.11-3:</b> In the event that nighttime (i.e., between seven p.m. and seven a.m.) construction activity is determined to be necessary within 500 feet of an occupied residential dwelling unit, a nighttime noise reduction plan shall be developed by PG&amp;E and submitted to the CPUC for review and approval. The noise reduction plan shall include a set of site-specific noise attenuation measures that apply state of the art noise reduction technology to ensure that nighttime construction noise and levels and associated nuisance are reduced to the most extent feasible. The attenuation measures may include, but not be limited to, the control strategies and methods for implementation that are listed below. If any of the following strategies are found by PG&amp;E to not be feasible, an explanation as to why the specific strategy is not feasible shall be included in the nighttime noise reduction plan.</p> <ul style="list-style-type: none"> <li>Plan construction activities to minimize the amount of nighttime construction.</li> <li>Offer temporary relocation of residents within 200 feet of nighttime construction areas.</li> </ul> <p>Temporary noise barriers, such as shields and/or blankets, shall be installed immediately adjacent to all nighttime stationary noise sources (e.g., drilling rigs, generators, pumps, etc.) that block the line of sight between nighttime activities and the closest residences.</p>	PG&E and its contractors to implement measure as defined.	<p>If applicable, PG&amp;E to submit nighttime noise reduction plan to CPUC for review and approval.</p> <p>CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>Submit plan to CPUC prior to commencing any nighttime construction activities.</p> <p>During all phases of construction that include nighttime construction activities.</p>
Population and Housing				
No mitigation required.				
Public Services				
No mitigation required.				
Recreation				
No mitigation required.				

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p>Transportation and Traffic</p> <p><b>Construction Traffic</b></p>	<p><b>Mitigation Measure 3.15-1:</b> Traffic Management and Control Plan. PG&amp;E shall prepare a Traffic Management and Control Plan that shall include, at a minimum, the measures listed below. The Plan shall be submitted to the CPUC for approval and shall be distributed to all construction crew members prior to commencement of construction activities. The Plan shall:</p> <ul style="list-style-type: none"> <li>• Include descriptions of work hours, haul routes, work area delineation, any traffic detour routes, bicyclists and pedestrian detour routes, traffic control, and flagging;</li> <li>• Identify all access and parking restriction and signage requirements;</li> <li>• Require workers to park personal vehicles at the approved staging areas and take only necessary project vehicles to the work sites;</li> <li>• Lay out plans for notifications of all lane and road closures and a process for communication with affected road users, including truckers, residents, and landowners prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which road/lanes and access point/driveways/parking areas would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints;</li> <li>• Include plans to coordinate all construction activities with emergency service providers in the area. Emergency service providers would be notified of the timing, location, and duration of construction activities. All roads would remain passable to emergency service vehicles at all times; and</li> <li>• Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow</li> </ul>	<p>PG&amp;E and its contractors to implement measure as defined.</p>	<p>PG&amp;E to submit Traffic Management to CPUC for review and approval.</p> <p>CPUC Third Party Environmental Monitor to monitor compliance.</p>	<p>Prior to commencement of construction activities.</p> <p>During all phases of construction.</p>

**TABLE 5 (Continued)  
MITIGATION MEASURES**

Environmental Impact	Mitigation Measures Proposed in this IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation and Traffic (cont.)  <b>Construction Traffic</b> (cont.)	<b>Mitigation Measure 3.15-2:</b> Coordination with Union Pacific Railroad. PG&E shall coordinate all construction activities with Union Pacific Railroad to avoid delays in freight train service along the Hollister Branch Line. PG&E shall implement, at a minimum, the Union Pacific Railroad safety and engineering guidelines when installing power lines over the railroad right-of-way (ROW). The Workers Environmental Awareness Program required under Mitigation Measure 3.7-4 shall require construction crews and project personnel to be trained on Union Pacific Railroad safety guidelines prior to commencing work within or over the railroad ROW.	PG&E and its contractors to implement measure as defined.	PG&E to submit documentation to CPUC showing proof of coordination with Union Pacific Railroad.  CPUC Third Party Environmental Monitor to monitor compliance.	During all phases of construction involving wire installation within or over the railroad ROW.
<b>Utilities and Service Systems</b>				
No mitigation required.				



# Attachment A

## Project Contact List





# Attachment B

## Communication Protocol Summary





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## Communication Protocol Summary

Section 2.3, *Roles and Responsibilities*, of the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP) includes a communication protocol to ensure that CPUC third party Environmental Monitors (CPUC third party EMs) have access to project information, including schedules, mitigation measure status, and survey results, on a daily basis. The communication protocol was also developed to establish a chain of command that will be used to report environmental issues observed during CPUC third party EM site inspections. The following table provides an outline of the communication protocol. For additional information, refer to Chapter 2, *Roles and Responsibilities*, and Chapter 3, *Environmental Compliance and Field Procedures*, of the MMRCP.

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
<b>Meetings</b>				
Construction Progress Meetings	PG&E Field Representative	PG&E Field Representative	PG&E PM	Construction progress meetings to be held in the field to discuss construction progress and construction and environmental issues. Refer to Section 2.3.1 of the MMRCP.
Teleconference Calls	CPUC third party Project Manager	CPUC PM	CPUC PM CPUC third party EMs PG&E PM PG&E ECM PG&E FR PG&E EMs	Teleconference call to discuss status of mitigation measures, construction schedule, issues noted during site visits, and project changes conducted on an as needed basis.
Field Meetings	PG&E PM or ECM, CPUC third party EMs or CPUC PM	PG&E Field Representative	CPUC PM CPUC third party EMs PG&E PM PG&E ECM PG&E FR PG&E EMs	Field meetings may be requested by any party to discuss variance requests, non-compliances, or other site-specific issues.
<b>Project Changes</b>				
Scheduling	PG&E PM or EM	CPUC PM or third party PM	CPUC third party EMs	Changes in project schedule that could affect the status of mitigation measures will be communicated to CPUC third party EMs by e-mail. If the project change would have an immediate impact, the CPUC third party PM will be contacted by phone.
Variance Requests	PG&E PM or EM	CPUC Monitoring Program PM	CPUC PM	All variance requests will be submitted to the CPUC third party PM through a variance request form and supporting documentation. The CPUC third party PM will forward the variance request to the CPUC PM after verifying the information is complete. The CPUC PM

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
				will distribute a variance request approval or denial after review is complete. Refer to Chapter 3 of the MMRCP.
<b>Compliance Issues</b>				
Minor Incidences and Non-compliances	CPUC third party EMs	PG&E EMs	PG&E PM	Minor incidences and non-compliances noted during site inspections will be documented by the CPUC third party EMs and sent to PG&E for corrective action. Notification of a minor incident or non-compliance will occur no later than the following day. If PG&E corrects the issue before the report is issued, it will be noted in the report. Refer to Sections 2.3.3 and 3.1.2 of the MMRCP.
General Concerns	CPUC third party EMs	PG&E EMs	PG&E PM	The CPUC third party EMs will contact PG&E EMs to discuss general issues and questions that come up during site visits. The CPUC may talk with other crew members on the ROW, but will not direct their work or rely on them for information regarding the project.
Agency Jurisdiction Concerns	PG&E PM or EM	Applicable Agency	CPUC third party EMs	The resource agencies will be notified by PG&E of any issues regarding their jurisdiction. The CPUC PM will also receive immediate notification. Communication between PG&E and resource agencies will be documented and submitted to the CPUC PM. In addition, if the CPUC third party EMs have an unresolved concern about compliance with agency requirement, they will request to participate in a call

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
Dispute Resolution	All	CPUC Monitoring Program PM	CPUC PM	with PG&E and the resource agency. Refer to Section 2.3.4 of the MMRCP for further discussion and a list of jurisdictional agencies.
				In the event that a dispute cannot be resolved in the field, the issue will be resolved by the CPUC. Refer to Section 2.3.5 of the MMRCP.

# Attachment C

## Site Inspection Form







1425 N. McDowell Boulevard  
 Suite 200  
 Petaluma, CA 94954  
 707.795.0900 phone  
 707.795.0902 fax

www.esassoc.com

**CPUC DAILY ENVIRONMENTAL MONITORING REPORT  
 PG&E HOLLISTER 115 KV POWER LINE RECONDUCTORING PROJECT**

**Date:**

**Report File Name:**

**Compliance Level:**  Acceptable  Incident  Minor Problem

Non-Compliance  Repeated Non-Compliance

**Compliance Advisory or Non-Compliance Report form attached?**  Yes  No

**Photo Documentation?**  Yes  No *(If yes, attach a photo log)*

**Construction Activity(s) Being Monitored:**

**General Summary of Mitigation Compliance and Site Conditions:**

**Recommendations:**

<u>ESA Monitor's Name</u>	<u>Signature</u>	<u>Date</u>



# Attachment D

## Variance Request Form







**Variance Request Form**  
**PG&E Hollister 115 kV Power Line Reconductoring Project**

Variance Request No.:

**CONTRACTOR SECTION**

Request Prepared By:

Landowner:

Current Land Use:

**Detailed Description of Variance:**

Attachments?  Yes  No

Photos?  Yes  No

**Variance Justification:**

<b>PG&amp;E ENVIRONMENTAL SECTION</b>	
Variance Level: <input type="checkbox"/> Level 1 <input type="checkbox"/> Level 2	Variance From: <input type="checkbox"/> Permit <input type="checkbox"/> Specification <input type="checkbox"/> Drawing <input type="checkbox"/> Mitigation Measure
<b>RESOURCES</b>	
<b>Biological:</b> <input type="checkbox"/> No Resources Present <input type="checkbox"/> Resources Present	
<b>Cultural:</b> <input type="checkbox"/> N/A (paved/graveled area & no ground disturbance) <input type="checkbox"/> No Resources Present <input type="checkbox"/> Resources Present	
Applicable Mitigation Measure:	
<b>Haz Mat:</b> <input type="checkbox"/> N/A (paved/graveled area & no ground disturbance) <input type="checkbox"/> No Haz Mat Present <input type="checkbox"/> Haz Mat Present	
Other Variance Conditions Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>REQUIRED SIGN-OFF SIGNATURES</b>	
Construction Manager: _____	PG&E Environmental Inspector: _____
Engineering Manager: _____	PG&E Environmental Supervisor: _____
<i>Level 1 variances require signatures from the Construction Manager and Environmental Inspector only. Level 2 variances require signatures from the Construction Manager, Environmental Inspector, Engineering Manager and Environmental Supervisor.</i>	
<b>CPUC and CPUC CONSULTANT SECTION</b>	
Variance Approved: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>AFFECTED RESOURCE(s) and APPLICABLE MITIGATION MEASURES</b>	
<input type="checkbox"/> Air Quality: _____	<input type="checkbox"/> Soils: _____ <input type="checkbox"/> Noise: _____
<input type="checkbox"/> Hazards and Hazardous Materials: _____	<input type="checkbox"/> Transportation and Traffic: _____
Other Variance Conditions Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>REQUIRED APPROVAL SIGNATURES</b>	
Consultant Environmental Monitor: _____	(Note: signature signifies review only)
Consultant Project Manager: _____	<input type="checkbox"/> Level 1 Verbal Approval
CPUC Project Manager: _____	<input type="checkbox"/> Level 1 Verbal Approval
<i>Level 1 variances require only verbal approval from CPUC Project Manager and Consultant Project Manager. Level 2 variances require signatures.</i>	



**Variance Request Form**  
**PG&E Hollister 115 kV Power Line Reconductoring Project**

**VARIANCE CONDITIONS**

<b>Condition Name:</b>
<b>Conditions:</b>
<b>Condition Name:</b>
<b>Conditions:</b>
<b>Condition Name:</b>
<b>Conditions:</b>