Atascadero – San Luis Obispo 70 kV Power Line Reconductoring Project

Mitigation Monitoring, Compliance, and Reporting Program

San Luis Obispo County, California

April 2011, Revised October 2011

Prepared for:

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1.1 Summary of Environmental Process

1.1.1 CEQA REVIEW AND REQUIREMENTS

The Pacific Gas and Electric Company (PG&E) proposes to replace the conductor and associated supporting wood poles and steel towers along 15.5 miles of the 70 kV power line that connects the Atascadero Substation to the San Luis Obispo Substation in San Luis Obispo County, California. An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by the California Public Utilities Commission (CPUC), pursuant to the California Environmental Quality Act (CEQA) to address the potential impacts of the project on the environment. The Final IS/MND was adopted on April 13, 2011. Several mitigation measures are identified to reduce all of the impacts of the proposed project to less than significant levels. The Final IS/MND also includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP). Chapter 4 of the Final IS/MND provides the recommended framework for the implementation of the MMCRP by the CEQA Lead Agency, the CPUC, and describes the roles and responsibilities of government agencies in implementing and enforcing adopted mitigation measures.

1.1.2 MMCRP REQUIREMENTS

This MMCRP has been prepared in accordance with the requirements set forth in the Final IS/MND and includes the information provided in Chapter 4, as well as specific protocols to be followed prior to and during construction by PG&E Environmental Inspectors (EIs) and CPUC Environmental Monitors (CPUC EMs) and PG&E project staff. TRC will be providing the PG&E EIs and environmental monitors as needed for biological, cultural, and paleontological resources. ETIC Engineering Inc. (ETIC) will be providing PG&E's environmental monitors as needed for stormwater resources. RMT Inc. (RMT) will be providing the CPUC EMs and biological monitoring will be provided by RMT subcontractors BioResources Consulting (BRC).

Implementation of the MMCRP requires direct participation and commitment from PG&E and CPUC EMs. The success of the program depends upon the coordination and communication between the project management staff, monitors, and construction contractor personnel. This MMCRP was developed to provide guidelines for mitigation implementation and to standardize procedures for environmental compliance during project construction. The procedures have been developed by and with the approval of PG&E, CPUC, and RMT and define reporting relationships, roles and responsibilities of the project's environmental compliance team members, compliance reporting procedures, and communication protocols.

1.2 Authority and Purpose 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, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval

are implemented properly, monitored, and reported on. 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 Mitigation Monitoring, Compliance, and Reporting Program when it approves a project that is subject to preparation of an IS/MND. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting.

The CPUC views this MMCRP as a working and living guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The mitigation measures proposed in the Final IS/MND and the framework for this MMCRP, as described in Chapter 4 of the Final IS/MND, were approved by the CPUC on April 13, 2011, (A10-03-006). A draft version of the MMP was distributed to PG&E, CPUC, and RMT for review and comment.

1.3 Schedule

Construction is scheduled to start May 15, 2011, with an estimated completion date of December 31, 2013. Construction would occur only during daylight hours. Construction activities within proposed critical habitat for the California red-legged frog (CRLF) would be avoided before April 1 and after the first winter rains (typically around November 1). The U.S. Fish and Wildlife Service (USFWS) would be consulted for any work within CRLF critical habitat boundaries that is required between November 1 and April 1. Construction activities may also be restricted during the period from February 15 through August 15 to avoid nesting birds. The proposed PG&E construction schedule is presented below in Table 1.4-1.

Table 1.4-1: Construction Schedule

Activity	Schedule
Final engineering design completed	July 15, 2010
Temporary construction easements acquired	May 1, 2011
Permit To Construct decision adopted and effective	April 14, 2011
Acquisition of required permits	February 1 to July 29, 2011
Long-lead material arrival	December 2010
Construction begins	May 17, 2011
Construction within CRLF critical habitat boundaries stops (unless approved by the USFWS) Construction outside of CRLF critical habitat continues	November 1, 2011 to March 31, 2012
Construction within CRLF critical habitat boundaries continues	April 1, 2012
Pole project segment becomes operational Cleanup and restoration efforts within Pole segment begins	December 1, 2012

Table 1.4-1 *(Continued)*: Construction Schedule

Activity	Schedule
Construction within CRLF critical habitat boundaries stops (unless approved by the USFWS), Construction outside of CRLF critical habitat continues	November 1, 2012 to March 31, 2013
Construction within CRLF critical habitat boundaries continues	April 1, 2013
Tower project segment becomes operational Cleanup and restoration efforts within Tower segment begins	December 1, 2013
Restoration and cleanup is complete	February 28, 2014

1.4 Project Documentation

1.4.1 CEQA DOCUMENT AND PROJECT PLANS

Several mitigation measures and Applicant Proposed Measures (APM) have been identified in the Final IS/MND. In addition to the APMs and mitigation measures, construction activities must be conducted in accordance with the requirements stipulated in the following plans:

- Stormwater Pollution Prevention Plan (SWPPP), including an Erosion Control and Sediment Transport Plan (ECSTP)
- Worker Environmental Awareness Program (WEAP), including biological and cultural resources
- Dust Control Plan
- Avian Protection Plan
- Revegetation and Monitoring Plan
- Hazardous Substance Control and Emergency Response Plan
- Fire Prevention and Response Plan
- Traffic Management Plan
- Health and Safety Plan

1.4.2 PERMITS

Several local, state, and federal agencies have jurisdiction over lands and/or resources that are crossed by the project route. The CPUC, as the lead agency, is responsible for ensuring that mitigation measures reviewed and approved by jurisdictional agencies during the Draft IS/MND process are implemented throughout construction. However, staff from other agencies may periodically visit the project site and request information regarding the status of mitigation implementation. PG&E is also required to submit survey results to the US Fish and Wildlife Service (USFWS), and to consult with the agency when project changes affect the condition identified in the project's permit. 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 permits for the project if the CPUC is not otherwise copied on the correspondence. Additional information on communication protocols is presented in Section 2.4 of this MMCRP. Table 1.5-1 lists jurisdictional agencies, purpose of consultation, and required permits associated with the project.

Table 1.5-1: Permits and Approvals That May Be Necessary for the Proposed Project

Permit, Approval, or Exemption	Purpose	Regulation Agency
Federal		
Section 404 Nationwide Permit	Work in "Waters of the United States," including wetlands.	U.S. Army Corps of Engineers (USACE)
Section 7 consultation (through federal review process)	Potential impacts to federally listed species or critical habitat.	U.S. Fish and Wildlife Service (USFWS); National Oceanic and Atmospheric Administration (NOAA) Fisheries
Notice of Proposed Construction or Alteration under Federal Aviation Regulations Part 77	Regulations apply to poles and towers over 200 feet in height above ground level at its site or within certain proximities to local airports.	Federal Aviation Administration (FAA)
State		
Permit to Construct (General Order No. 131-D)	Construction, modification, or alteration of power line facilities.	California Public Utilities Commission (CPUC)
Section 401 Water Quality Certification	Consistency with state water quality standards.	Central Coast Regional Water Quality Control Board (RWQCB)
1600 Streambed Alteration Agreement	Work that affects the bed or bank of a stream or lake.	California Department of Fish and Game (CDFG)
Standard Encroachment Permit	For use of California state highways for other than normal transportation purposes, including construction activities completed within the ROW.	California Department of Transportation (Caltrans)
National Pollution Discharge Elimination System (NPDES) Storm Water Permit	Construction activities disturbing 1 acre or more of soil must submit a Notice of Intent to comply with the terms of the general permit.	State Water Resources Control Board
Encroachment Permit	For construction and maintenance activities within ROW	Department of Water Resources (DWR)
Local		
Air Pollution Control District Permit	For conducting activities which may result in air pollution.	San Luis Obispo County Air Pollution Control District (SLOCAPCD)
Encroachment Permit	For the use of local roads for purposes other than normal transportation.	City of Atascadero; City of San Luis Obispo; County of San Luis Obispo
Tree Removal Permit	For the removal of trees.	City of San Luis Obispo; County of San Luis Obispo

2: Roles and Responsibilities

This section describes the roles and responsibilities of key project personnel with respect to the MMCRP. Figure 2.1-1 provides an organizational chart of project members responsible for implementing the MMCRP and their relationship to other staff working on the project. The organization chart also establishes preliminary lines of communication between the project team members. A summary table of each team member's roles and responsibilities and related communication protocols is provided in Appendix C of this MMCRP.

2.1 Organization Overview

2.1.1 PG&E PROJECT MANGER

PG&E's Project Manager, Lee Ellis, provides the overall direction, management, leadership, and corporate coordination for the construction project. The Project Manager will be based in PG&E's 406 Higuera Street, San Luis Obispo office location for the duration of construction. The Project Manager's responsibilities for implementation of the environmental program include, but are not limited to:

- Coordinating between engineering, construction management, and environmental staff
- Providing leadership by integrating environmental responsibilities into all levels of the project organization
- Ensuring compliance with project policies, guidelines, and procedures
- Communicating project activities, schedules, and public relation issues to the project team

2.1.2 PG&E CONSTRUCTION MANGERS

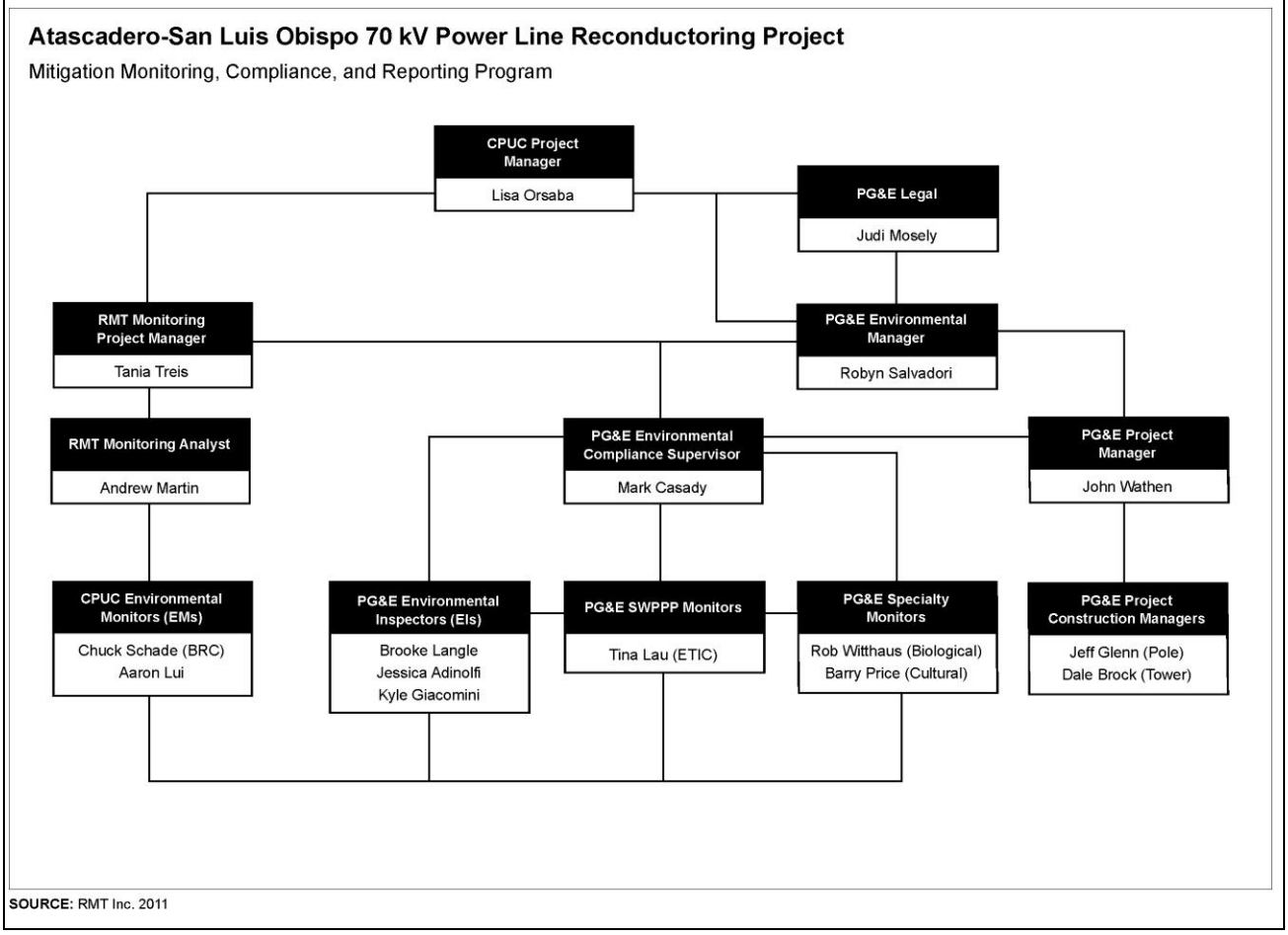
The Construction Managers, Jeff Glenn (Pole Segment) and Dale Brock (Steel Tower Segment), provide support to the Project Manager and oversee activities of construction staff. Construction Foremen will be Robert (Bobby) Rael (Pole Segment) and Aaron Henson (Tower Segment). The Construction Foremen will typically be available in the field on a daily basis. Specific responsibilities of the Construction Managers and Foremen include, but are not limited to:

- Ensuring compliance with company specifications, permit conditions, construction contracts, and applicable codes
- Notifying Environmental Inspectors of project and schedule changes
- Working with Environmental Inspectors to evaluate and improve the implementation of the MMCRP, as construction progresses
- Regularly facilitating project field meetings

2.1.3 PG&E ENVIRONMENTAL MANGER

PG&E's Environmental Manager, Robyn Salvadori, is responsible for providing the appropriate level of resources for successful implementation of the MMCRP. The Environmental Manager is responsible for directing development and implementation of pre-construction environmental

Figure 2.1-1: Project Member Organizational Chart



SOURCE: RMT Inc. 2011

planning, permitting and compliance activities, environmental inspection program, and environmental training. The Environmental Manager is also responsible for ensuring compliance with the requirements of any permits (such as the conditions identified in the project's Biological Opinion issued by the USFWS). The Environmental Manager will be based out of PG&E's 245 Market Street, San Francisco office location.

2.1.4 PG&E ENVIRONMENTAL INSPECTORS AND MONITORS

The PG&E monitoring team will include an Environmental Compliance Supervisor, Mark Cassady, who will support the PG&E Environmental Manager and coordinate the activities of PG&E EIs and the biological, paleontological, and cultural field monitors (collectively, PG&E Specialty Monitors), as needed, to comply with each mitigation measure. PG&E Environmental Inspectors (PG&E EIs) will work closely with construction personnel to ensure pre-construction surveys are completed and mitigation measures are correctly implemented. PG&E EIs are the primary field staff responsible for evaluating, documenting, and verifying that construction activities comply with all applicable mitigation requirements and federal, state and local permit requirements. PG&E EIs will also work closely with the CPUC EMs to determine the effectiveness of mitigation measures and whether adjustments are needed to provide adequate protection of

sensitive resources. PG&E Specialty Monitors will be assigned as needed and required to protect sensitive biological, cultural, and paleontological resources. In some instances, a PG&E EI may perform specialty monitoring if he or she has the appropriate qualifications and experience.

2.1.5 CPUC PROJECT MANAGER

The CPUC Project Manager, Lisa Orsaba, will determine the effectiveness of the MMCRP 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 (RMT monitoring team), 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 any issues that arise. All variance requests will be submitted to the CPUC Project Manager for review and approval.

2.1.6 CPUC ENVIRONMENTAL MONITORS

The CPUC will delegate daily monitoring and reporting responsibilities to RMT. The number of CPUC Environmental Monitors (CPUC EMs) and frequency of site inspections will depend on the number of concurrent construction activities and their locations. The CPUC EMs will report directly to the CPUC Environmental Monitor Project Manager (CPUC Monitoring PM),Tania Treis, who will oversee the day-to-day monitoring activities of the EMs, as well as determine the appropriate level of inspection frequency. CPUC EMs will be an integral part of the project team, and will stay apprised of construction activities, schedule changes, and construction progress. The CPUC EMs will document compliance through bi-weekly reports and use of a mitigation measure tracking table, which will be reviewed by the RMT Monitoring PM and submitted to the CPUC PM on a biweekly basis.

The CPUC EMs primary contact in the field is the PG&E EI.

2.1.7 CONSTRUCTION PERSONNEL

The PG&E construction staff and contractor staff have significant responsibilities for compliance with the environmental requirements of the project. The Construction Manager(s) and contractor(s) will be responsible for incorporating all project environmental requirements into their day-to-day construction activities. Key environmental responsibilities for the Construction Manager(s) and Contractor(s) staff include, but are not limited to:

- Verifying that all construction workers attend the project's environmental training program prior to beginning work on the ROW
- Reviewing and understand the environmental requirements
- Implementing environmental protection requirements and conditions during construction
- Maintaining compliance with project requirements
- Responding to PG&E EI's requests during construction

2.1.8 MITIGATION MONITORING PROGRAM CONTACT LIST

A project contact list is included as Appendix B. The contact list includes the PG&E and CPUC monitors, project managers, supervisory staff, and other members of the project team. The list also

includes phone numbers, fax numbers, and e-mail 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 is responsible for ensuring full compliance with the provisions of this monitoring program and has primary responsibility for implementation of the monitoring program. The CPUC has delegated monitoring responsibilities to a third-party, RMT. The CPUC 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 also elect to monitor construction or conduct site visits.

PG&E will elect to have one or more full-time EIs on-site on a daily basis to coordinate with the Specialty Monitors, and to assist construction crews with interpreting mitigation measures and correcting compliance issues in a timely manner. EIs would also provide environmental training, as required, as new workers arrive on the project.

Several mitigation measures require PG&E to supply a general monitor or a monitor with a resource specialization, as identified in Table 2.2-1.

Table 2.2-1: Required On-Site Monitoring

Mitigation Measure/ Applicant Proposed Measure Number	Resource	Monitor	Project Area
MM AQ-1	Air Quality: Dust Control Measure	General	All, as needed
MM BO-1	Active Avian Nests	Biological	Within nest non-disturbance buffers
MM BO-4/APM BO-17	Sensitive Amphibian Species	Biological	Within 50 feet of CRLF
APM BO-9	Sensitive Biological Areas	Biological	In or near sensitive habitats
MM BO-24	Active Burrowing Owl Nests	Biological	Within 160 feet of occupied burrows during September 1 through January 31, or within 250 feet during February 1 through August 31
MM BO-25/26/ APM BO-27	Roosting Bat Nest	Biological	At potential or confirmed roosting bat nest or a maternity colony

Table 2.2-1 *(Continued)*: Required On-Site Monitoring

Mitigation Measure/ Applicant Proposed Measure Number	Resource	Monitor	Project Area
APM CR-3	Previously Unidentified Cultural Resources	Cultural	At a previously unidentified cultural resource site
MM CR-5	Paleontological Resources	Paleontological	At deeper excavations or grading (more than 2′ deep, excluding augering or hand-digging for pole or tower fitting holes) in high-sensitivity units

2.2.1 ENFORCEMENT

The CPUC is responsible for enforcing monitoring procedures through the CPUC EMs. The CPUC EMs note problems with monitoring, notify designated project members, and report the problems to the CPUC Monitoring PM, who then reports problems to the CPUC Project Manager. The CPUC, through its EMs and/or its Monitoring PM, has the authority to direct the PG&E EIs and the PG&E Environmental Manager to stop or modify any construction activity associated with the Atascadero-San Luis Obispo 70 kV Power Line Reconductoring Project, when it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area). The PG&E EI will direct the PG&E Construction Manager or designated lead to stop the construction activity in a safe and secure manner. The CPUC has assigned this authority to the CPUC EMs in the field. The CPUC EM will follow communication protocols that are more fully described in Section 2.3.3 and Appendix C of this MMCRP. In the event that the CPUC directs that work be stopped, the CPUC will provide, in writing and within 24 hours of the stop order or by close of business on the next business day if the stop work order is issued on a Friday, the reason for the work stoppage, the limits of the stop work order, and the conditions that must be met to resume work.

2.2.2 MITIGATION COMPLIANCE

PG&E is responsible for successfully implementing all of the adopted mitigation measures in the MMCRP. The MMCRP contains criteria that define whether mitigation is successful. Standards for successful mitigation are also implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact.

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 determine with PG&E the subsequent actions required. If the measures are agency permit requirements, then PG&E will coordinate with the permitting agency to determine the appropriate action.

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 must interact regularly and maintain professional, responsive communications at all times. Similarly, PG&E representatives must coordinate closely with CPUC EMs to address and resolve issues in a timely manner. Appendix C includes a communication protocol summary for use as quick reference, and to supplement information provided in Section 2.4.

2.3.1 PRE-CONSTRUCTION KICK OFF MEETING

A pre-construction meeting was held on March 15, 2011 with the CPUC and PG&E team to review the MMCRP and to mutually agree upon the project's communication protocol. Based on discussion at the meeting and input from each party, Section 2 of this document was finalized and incorporated into the MMCRP.

2.3.2 WORKER ENVIRONMENTAL TRAINING PROGRAM

PG&E will facilitate a worker environmental training program prior to construction that will be coordinated to occur prior to the planned start of tower and pole construction. This program will target construction management staff and inspectors, supervisors, and key foremen. The program will address specific resource issues and compliance requirements. Workers will be required to attend the environmental training program prior to starting work on the project. Modified training programs may be administered for field visitors such as agency personnel, CPUC staff, contractors providing bids, etc.; however, these non-field staff must always be accompanied by field personnel who have received the full training program. Modified training may also be administered to project personnel who have very limited roles such as delivery or concrete truck drivers.

2.3.3 PROGRESS MEETING

PG&E may request CPUC's EM(s) to participate in regular field meetings to help resolve any issues that may have arisen during the previous period and anticipate any issues that may arise in the upcoming activities. Alternatively, PG&E or CPUC's EM(s) may recommend a separate meeting to discuss mitigation, variance requests, or other project related issues.

In addition to the progress meetings conducted at the field level, the PG&E Project Manager, Construction Manager(s), PG&E EIs, and the CPUC Monitoring PM and/or CPUC Project Manager may participate in a regular teleconference call to discuss project status.

2.3.4 DAILY AND WEEKLY COMMUNICATION

Many of the issues that come up during construction can be resolved in the field through regular communication between CPUC EMs, PG&E EIs, and construction supervisors and contractors. Field staff will be equipped with cell phones and available to receive phone calls at all times during construction. A project contact list is included in Appendix B. The organization chart (Figure 2.1-1) shows the lines of communication for use during construction. Additional guidelines to ensure effective communication in the field are summarized below.

CPUC EM

The CPUC EM's primary point of contact in the field is PG&E's EI. The CPUC EM will contact a PG&E EI if an activity is observed that conflicts with one or more of the mitigation measures in order to correct the situation. If the CPUC EM cannot immediately reach PG&E's EI, then the PG&E Environmental Manager will be contacted to address the problem. Similarly, the CPUC EM will contact a PG&E EI for construction locations, the status of mitigation measure implementation, and schedule forecasts. The CPUC EM may discuss construction procedures directly with the construction contractors; however, PG&E may require that their contractors defer questions to an onsite PG&E representative. In all cases, the CPUC EM will contact the designated PG&E representative if a problem is noted that requires action from the contractor.

The CPUC EM will not direct the contractor; however, the EM has the authority to direct the PG&E EI to inform the PG&E Construction Manager or designated lead that work (or an on-going activity) must be stopped or modified, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area). If an activity could have an immediate threat to a sensitive resource and doesn't allow time to contact the PG&E Construction Manager or designated lead to avoid impacts, and assuming it is safe to do so, the EM will have authority to temporarily halt activities. The CPUC EM's authority to halt an activity only applies to the direct activity that would cause the potential threat and only for a period of time long enough to contact the PG&E Construction Manager or designated lead for further direction or to avoid the threatened resource. In the event that the CPUC directs that work be stopped, the CPUC will provide, in writing and within 24 hours of the stop order or by close of business on the next business day if the stop work order is issued on a Friday, the reason for the work stoppage, the limits of the stop work order, and the conditions that must be met to resume work.

PG&E

PG&E will provide the CPUC monitoring team 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 and responsibility, and will be updated as new project personnel are assigned to the project and redistributed as necessary.

PG&E will prepare and distribute a weekly environmental compliance status report for distribution to key project members, including the CPUC.

Any questions regarding the status of mitigation measures will be directed to the PG&E Environmental Manager. The weekly environmental compliance status report will also be a tool to keep all parties informed of construction progress and schedule changes.

2.3.5 COMMUNICATION COMPLIANCE ISSUES

Section 3.1.5 describes procedures to communicate incidents, and non-compliances identified by the CPUC EMs during site inspections.

2.3.6 COORDINATION WITH OTHER AGENCIES

As discussed in Section 1.5.2, 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 is responsible for contacting resource agencies and notifying them of issues within those agencies' jurisdiction. 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 Monitoring PM may elect to contact the agency with PG&E to discuss resolution, but only after having given PG&E sufficient time to address the issue themselves. The CPUC Monitoring PM will coordinate with PG&E prior to making this call and provide PG&E with an opportunity to participate in the call.

2.3.7 DISPUTE RESOLUTION

Disputes may develop between PG&E and CPUC when conflicting opinions of project processes and procedures are made. It is expected that the MMCRP will reduce or eliminate many potential disputes; however, even with the best preparation, disputes may occur.

Issues should be first addressed informally at the field level between the CPUC EMs and PG&E's Environmental Inspectors or Environmental Monitors or at the regular progress meetings. Questions may be raised to the PG&E Environmental Manager and the PG&E Project Manager. Should the issue persist or not be resolved at these levels, the following procedures will be used.

Step 1 Disputes unresolved in the field and complaints (including those of the public) should be directed to the CPUC Project Manager for resolution. The Project Manager will attempt to resolve the dispute informally. Should this informal process fail, the CPUC Project Manager will inform PG&E prior to initiating Step 2.

Step 2 Should this informal process in the field fail, the CPUC Project Manager may issue a formal letter requiring corrective actions to address the unresolved or persistent deviations from the Proposed Project or adopted Mitigation Monitoring Program.

Step 3 If a dispute or complaint regarding implementation or evaluation of the Program or mitigation measures cannot be resolved informally or through a letter request, 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 to resolve 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.

Parties may also seek review by the Commission through existing procedures specified in the CPUC 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.

3: Environmental Compliance and Field Procedures

3.1 Mitigation Measures Compliance and Reporting

3.1.1 PRE-CONSTRUCTION COMPLIANCE VERIFICATION

In addition to performing various surveys and studies prior to construction, PG&E is required, by the terms of the mitigation measures and the permitting requirements of various other regulating agencies, to prepare and obtain approval for several construction plans. Copies of plan approval will be retained by RMT, and provided to the CPUC with all files at the completion of the project. The required plans, surveys, studies, and other documentation that must be completed by PG&E before construction are listed in the Mitigation Measure/Applicant Proposed Measure tables in Appendix G.

While the required construction plans are being reviewed by the approving agencies, they will also be reviewed by the CPUC. Compliance with all pre-construction mitigation measures and APMs will be verified prior to construction, and construction may not start on any segment before PG&E receives a written Notice to Proceed (NTP) from the CPUC Project Manager.

RMT, including Project Management staff and the technical experts, will review all mitigation plans and reports and provide comments where applicable. Resource agencies will also be involved in the review of applicable plans and reports. Where the MND calls for CPUC review and approval of a plan or document, comments on these documents will be provided to PG&E for required local and State agency permitting/consultations, RMT will track PG&E's progress as it relates to PG&E's construction plans and project mitigation and permitting requirements. Based on PG&E's construction plans, CPUC may authorize construction to begin on a phased basis, and RMT will complete pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately as pre-construction compliance is satisfactorily accomplished for that phase.

IMPORTANT: The CPUC will not authorize construction to begin until all relevant pre-construction requirements are fulfilled as appropriate for a given phase. To save time, PG&E should identify any extra work space needs required for each phase of construction prior to the start of active construction, so that these locations and their use can be included in the NTP. Refer to Section 3.2.2.

3.1.2 NOTICE TO PROCEED PROCEDURE

The CPUC Project Manager and all IS/MND team reviewers will ensure that the NTP approvals are consistent with the adopted CEQA document. The NTP approval(s) shall document that relevant pre-construction mitigation measure requirements, including applicable surveys and studies, and project permit requirements have been met. More than one NTP can be requested for the Project. Each NTP request would be applicable to a defined aspect or segment of construction. Construction is defined as any mobilization activity that would move construction-related equipment and/or materials onto a site. In some instances, compliance with every requirement

cannot be met prior to NTP issuance and the NTP may be conditioned to define actions that will be undertaken and documented prior to construction or prior to energizing the line.

An NTP may be issued for a particular segment or project component upon compliance with applicable mitigation measures and permits, and this process could occur in advance of mitigation compliance for the entire project.

An NTP request must include the following information:

- A description of the work
- Detailed description of the segment location, including maps, photos, and/or other supporting documents
- Verification that all relevant preconstruction mitigation measures and APMs are implemented, or that they do not apply to the work covered by the NTP request.
- Verification that all applicable permit conditions or requirements have been met for the work covered by the NTP request
- In the case where some outstanding preconstruction compliance items cannot be met prior to issuance of the NTP, a request shall be submitted that identifies the outstanding submittals, as well as how they will be met and approved in a timely manner prior to construction
- Up-to-date biological resource surveys or a commitment to survey and submission of results prior to construction
- All applicable jurisdictional permits or agency approvals (if necessary)
- Date of expected construction and duration of work

CPUC/RMT will review the NTP request and pre-construction requirement submittals, in accordance with the steps outlined below, to ensure that all of the information required to process the approval is included.

1. PG&E submits NTP request
2. CPUC/RMT will distribute the NTP request to the appropriate resource specialists and reviewers to determine the completeness of the request, as applicable.
3. CPUC/RMT will also review and, if needed, will prepare a list of outstanding requirements, identifying where additional information or clarification is needed
4. All questions and comments, as well as required additional information or clarifications, will be sent to PG&E by CPUC/RMT in an e-mail
5. PG&E will supply clarifications and/or additional information to be added to the NTP request in a memo, email, or letter format, along with responses addressing all comments and questions forwarded by CPUC/RMT
6. CPUC/RMT will complete a Compliance Status Table documenting compliance and any outstanding requirements that can be made conditions of the NTP. If comments or conditions are provided by, permitting agencies, they will be considered for incorporation into the NTP approval letter and compliance table
7. RMT will prepare the draft NTP approval letter, which will document the scope of work, compliance with IS/MND mitigation requirements, and list outstanding conditions

8. CPUC will review the draft NTP approval letter, and send the approval and an updated compliance table to PG&E

Please note that variance requests can be submitted with the NTP request for incorporation into the NTP (please see Section 3.2.1 for variance submittal requirements).

3.1.3 COMPLIANCE VERIFICATION

The CPUC EMs will conduct routine site visits to determine compliance with the mitigation measures. Site visits will be coordinated with PG&E EIs; at a minimum, the CPUC EMs will verify with PG&E that access can be safely granted. Supplemental information provided by PG&E EIs, including pre-construction submittals, survey reports, weekly reports, meeting notes, and agency correspondences, will also be used to verify compliance.

3.1.4 COMPLIANCE REPORTING

The CPUC EMs will document observations along the ROW through the use of field notes and digital photography. Field inspection forms will be utilized 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 Appendix G.

3.1.5 COMPLIANCE LEVELS

Both PG&E and CPUC will perform compliance reporting.

CPUC

Occurrences

Occurrences are issues or concerns that do not rise to the level of a non-compliance event, but that if left uncorrected or repeated could result in an incident or non-compliance event should be noted and provided to the PG&E Compliance Supervisor and Environmental PM by the CPUC Monitoring PM. These observations or concerns could also include minor deviations from a permit condition or mitigation measure that do not change the effectiveness of the mitigation measures. These issues or concerns are typically addressed and resolved at the field level.

- A trash bin that needs emptying
- A clarification to the interpretation of a measure
- A worker who was stopped before entering an exclusion zone for which he did not know the footprint

Incidents (Documentation Required)

If a construction activity or observed resource protection measure only slightly deviates from project requirements and does not put a resource at risk, the CPUC EM would instead issue an incident report to correct the issue. Construction activities that could result in an incident report include, but are not limited to, the actions listed below.

- Failure to properly maintain an erosion or sediment control structure, but the structure remains functional
- Use of an existing unapproved access road
- Project personnel begin work on the ROW without proof of training
- Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot

Any such incident must be reported to the CPUC Monitoring PM by the close of business the day of the incident event. Details of the incident event, any results or impacts from the incident, and any corrective measures taken will be included in the report. The Incident Report Form (Appendix D) will be completed and submitted with the bi-weekly report. Alternatively, an email providing the information specified in Appendix D may be used. The notification should provide the same information as the original notification of the event, but should also include any additional detail regarding delayed impacts or follow-up actions taken within the following days. Incident reports will generally not be issued twice for the same compliance issue. In other words, repeated incidences will result in a non-compliance.

Non-compliance (Documentation Required)

A construction activity that deviates from permit conditions or mitigation measures and puts a resource at un-permitted risk would be considered a non-compliance. A non-compliance may also be issued if a mitigation measure is not implemented according to the timing restrictions listed in the mitigation table. Examples of non-compliances include, but are not limited to the actions listed below.

- Use of staging areas or extra workspace not identified in the MND or approved for use during construction
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance
- Construction-related brush clearing outside the approved work limits
- Construction-related grading, pole replacement, or line work without required biological pre-construction surveys or a biological monitor onsite where and when required
- Improper installation of erosion or sediment control structures that cause unauthorized release of sediments
- Discharge of sediment laden pole hole water into a water body or storm drain

The CPUC Monitoring EM will immediately inform the PG&E EI who will notify the designated construction lead to halt the construction activities and implement any emergency action to stop the non-compliance once it is safe to do so. The CPUC Monitoring PM and PG&E Environmental Manager and/or Project Manager will be immediately notified of a non-compliance that requires immediate corrective action. A non-compliance memorandum will be sent to PG&E by the CPUC Project Manager by the close of business the day that outlines the incident, lists actions required to bring the activity back into compliance, and provides a timeline for follow-up.

3.2 Project Changes

At various times throughout the project, the need for extra workspace or additional access roads may be identified outside of the permitted project area. 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. The project team should work together to find solutions when variations or adjustments are necessary for specific field situations.

3.2.1 VARIANCE PROCEDURE

The CPUC Project Manager along with the CPUC Monitoring team will ensure that any variance process or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements. A variance will not be approved by the CPUC if it will create new significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements unless the appropriate agency has approved the change, that does not increase the severity of an impact or create a new impact without appropriate agency approval, and that complies with the intent of the mitigation measure.

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 Monitoring PM for their review. The CPUC Monitoring PM 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 or additional information from the CPUC EM in order to process the variance. In some cases, a variance may also require approval by jurisdictional agencies. A variance request must include the information listed below.

- 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.
- Agency approval (if necessary)

A sample variance request form is included in Appendix E.

3.2.2 TEMPORARY EXTRA WORK SPACE PROCEDURES

For the purposes of this MMCRP, Temporary Extra Work Space (TEWS) is defined as a work space that will be utilized by PG&E during construction for a period of up to 60 days, and that was not identified and evaluated during the CEQA process. Any areas that would be utilized for longer than 60 days will require a variance (see Section 3.2.1). PG&E must demonstrate the following requirements:

- The TEWS is located in a disturbed area with no sensitive resources, or on-site or adjacent land uses that could be disrupted
- PG&E has permission of the applicable landowner (e.g., municipality or private) to use the work space
- Use of the TEWS would not result in any significant environmental impacts

In the event that PG&E determines a need for a construction TEWS, a request must be submitted to the CPUC Monitoring PM. The CPUC Monitoring PM will have the authority to approve or deny use of a TEWS, assuming it meets the criteria defined in the previous paragraph. PG&E will not be permitted to use a TEWS prior to receiving written authorization from the CPUC Monitoring PM.

The TEWS request should include the following information:

- Date of request
- Location of the TEWS (detailed description, including maps if required)
- Property owner of TEWS
- An explanation of the necessity for the TEWS
- An analysis that demonstrates no new significant impacts would result from use of the TEWS including: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as old oil spills or other potentially hazardous or polluting substances; abandoned vehicles, equipment or other materials; or other sensitive resources
- Biological and botanical survey, especially for invasive plants, and mitigation for invasive plants if present
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

A sample TEWS form is included in Appendix F.

3.3 Records Management

Any daily inspection and weekly status reports will be filed and used by RMT to prepare a brief, final environmental compliance report following the completion of construction. The final report will provide a discussion on how each mitigation measure was implemented and will 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.

4: Mitigation Monitoring Program Table

4.1 Using the Table

The table in Appendix G lists the mitigation measures included in the Final IS/MND and. The table is the core document for determining compliance with the MMCRP. A copy of the table should be kept with each crew working on the ROW, and all supervisory staff working on the project should be familiar with its contents.

The CPUC will use a modified version of the mitigation measure tables during the pre-construction planning and construction monitoring phases of the project to accurately track the status of mitigation measures. Tables will be sorted and divided into pre-construction measures and measures to be implemented during construction. A separate table listing mitigation measures that require CPUC approval may be generated. The modified tables will also include a status column that will be updated on a regular basis.

4.2 Effectiveness Review

The CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts, at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 2.4.6. If the Commission determines that any conditions are not adequately mitigating environmental impacts caused by the project, then the Commission may, in coordination with PG&E, develop alternative measures to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the Commission's rules and practices.

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Appendix A:
Project Segment Maps

Figure A-0: Power Line Segment Index and Legend

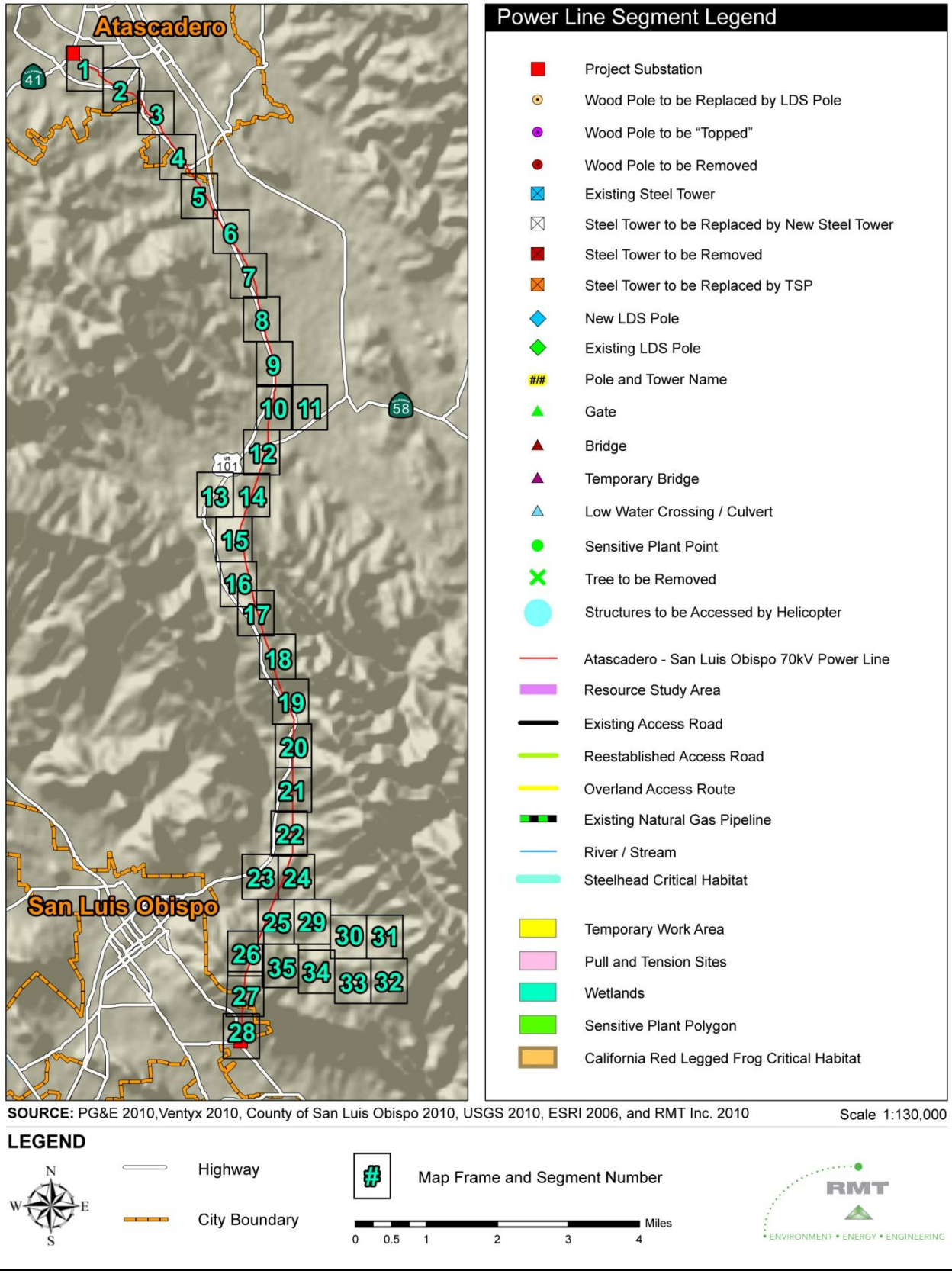
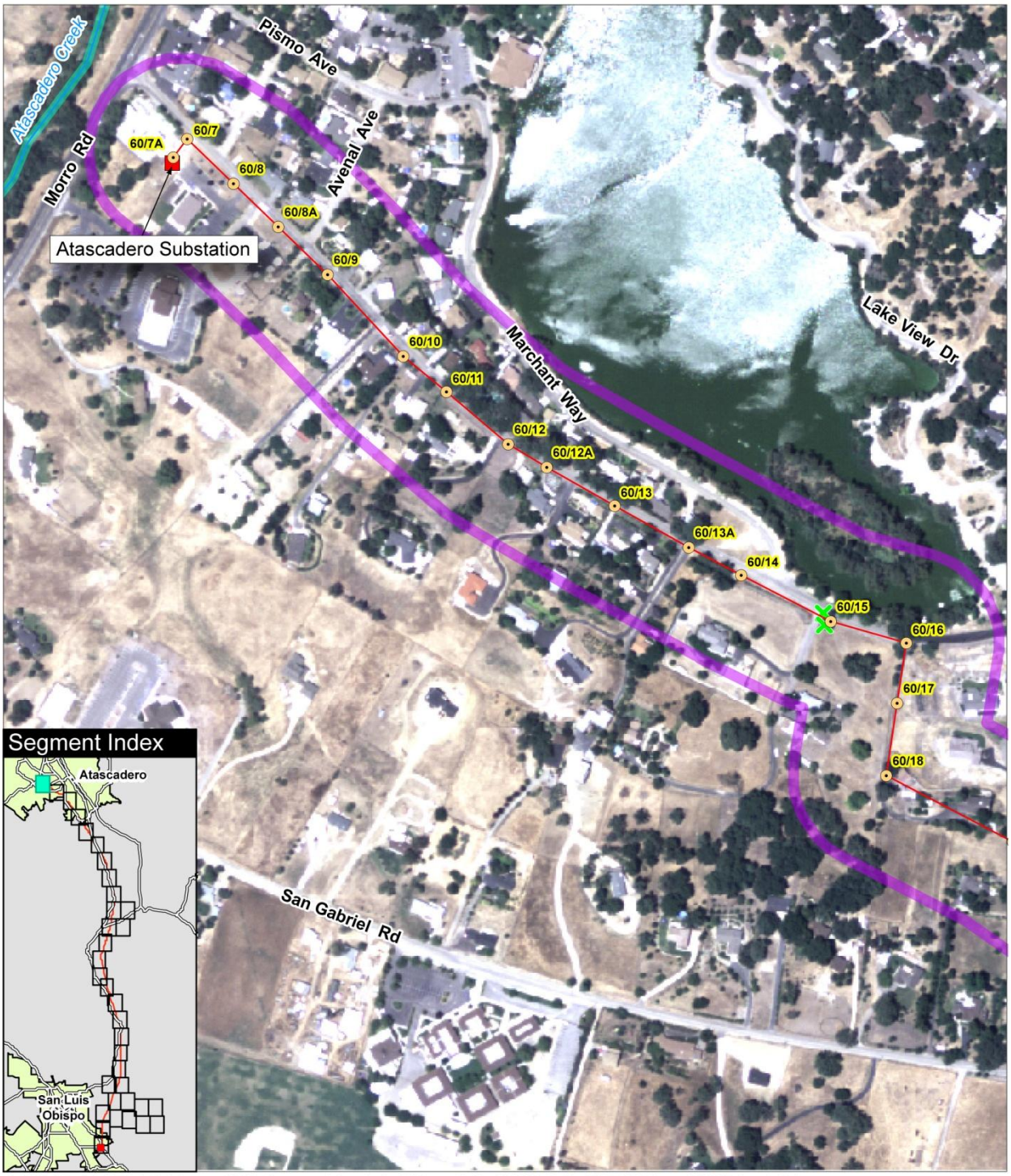


Figure A-1: Power Line Segment (1 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

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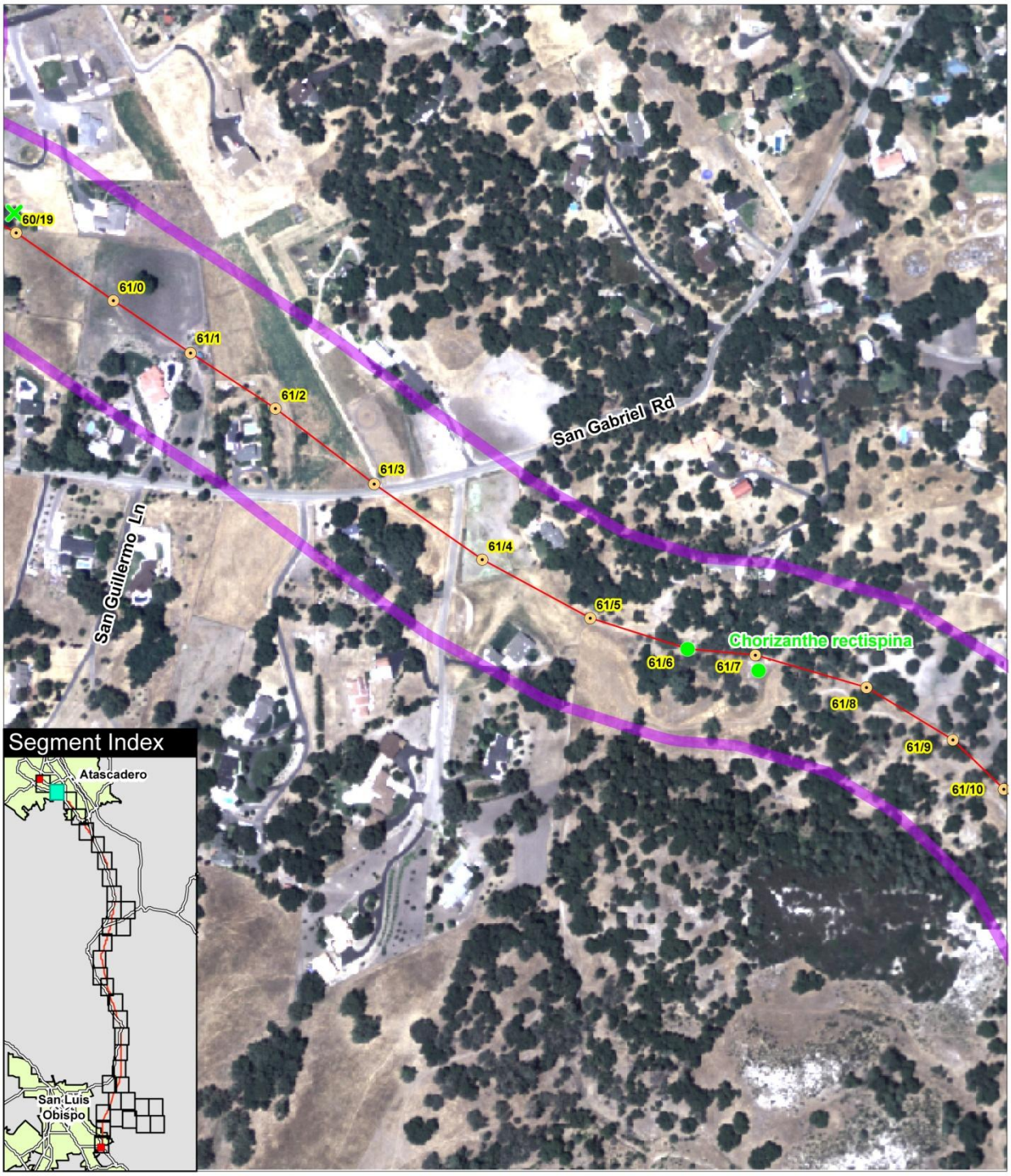
Figure A-2: Power Line Segment (2 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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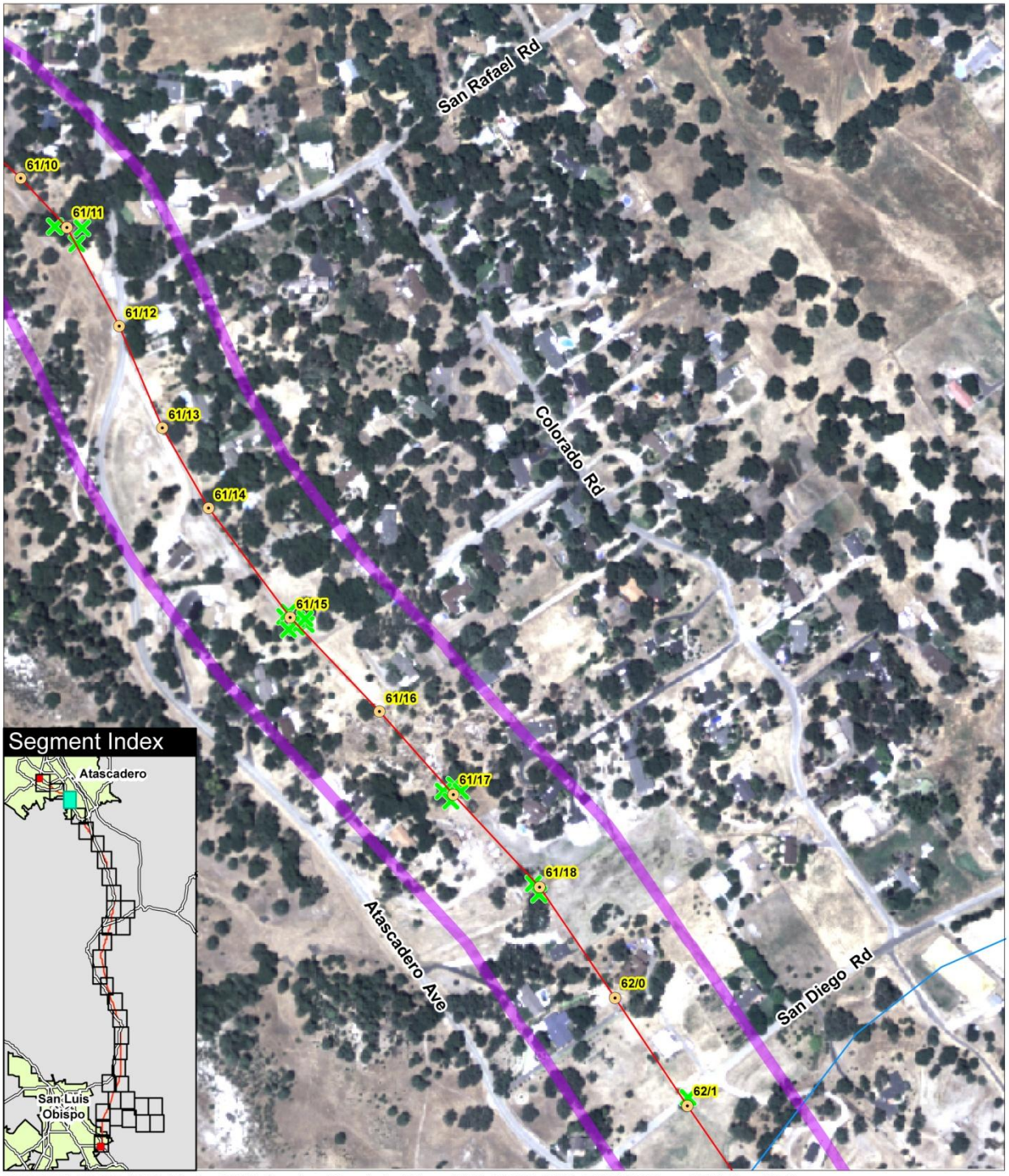
Figure A-3: Power Line Segment (3 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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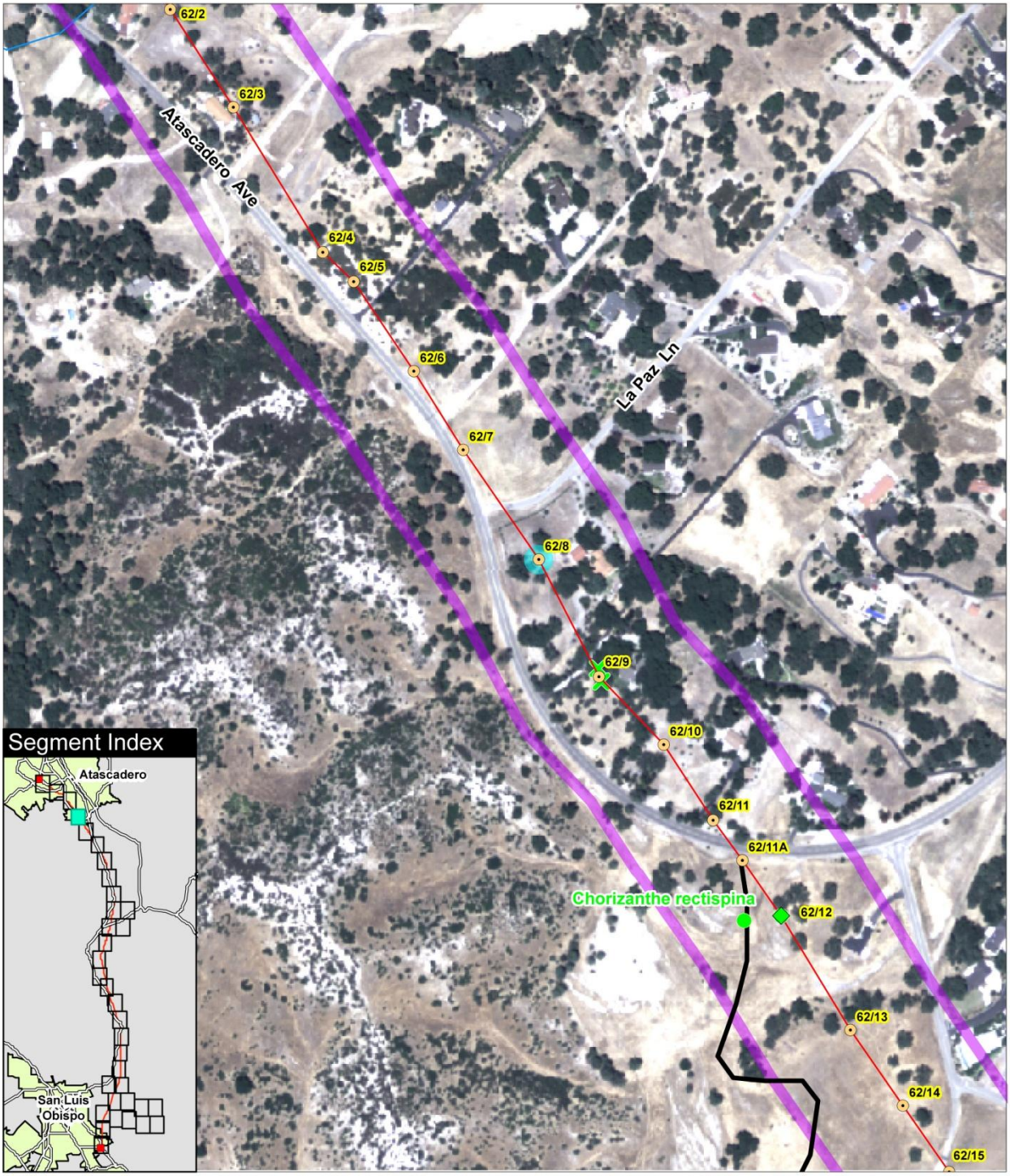
Figure A-4: Power Line Segment (4 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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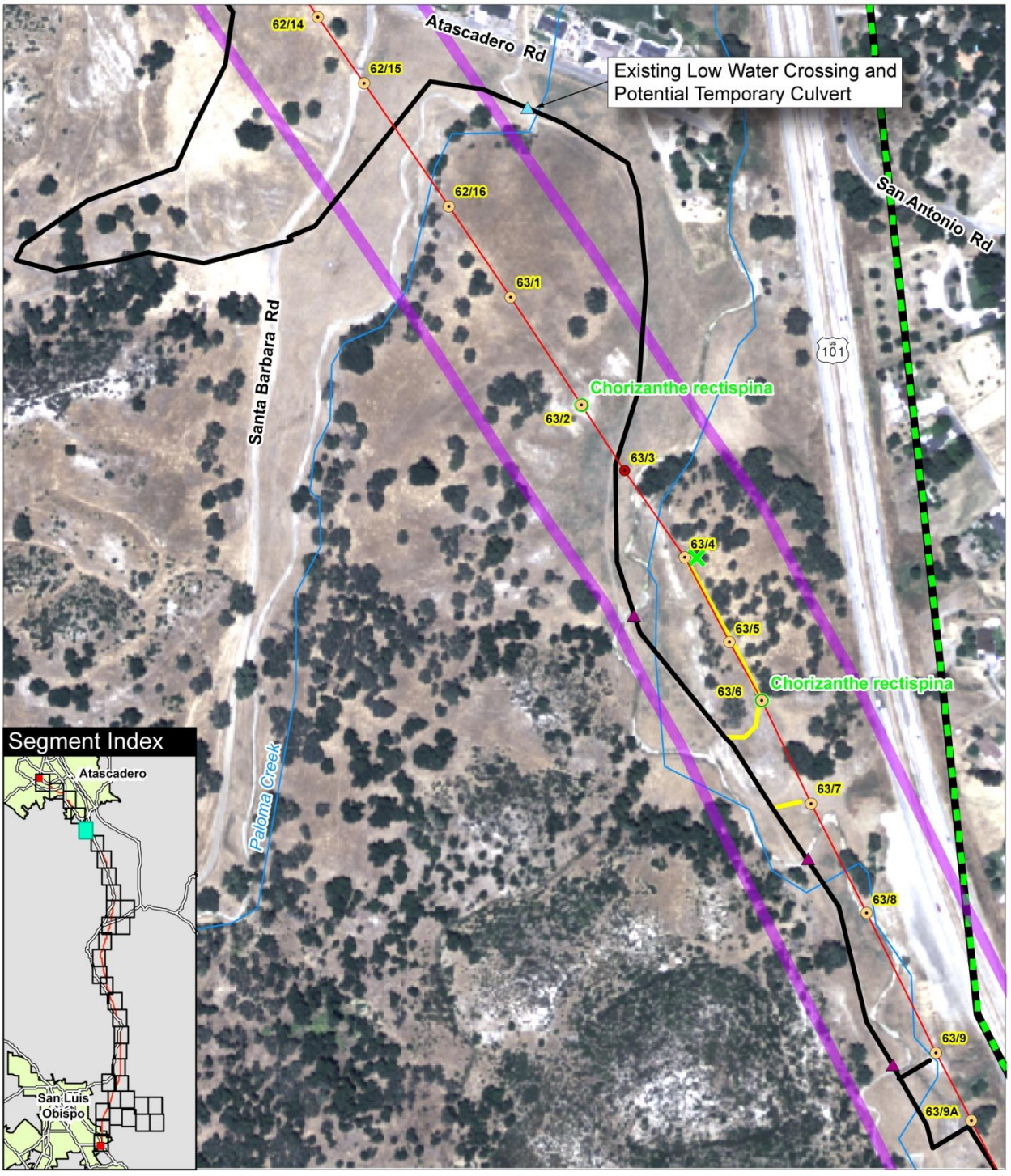
Figure A-5: Power Line Segment (5 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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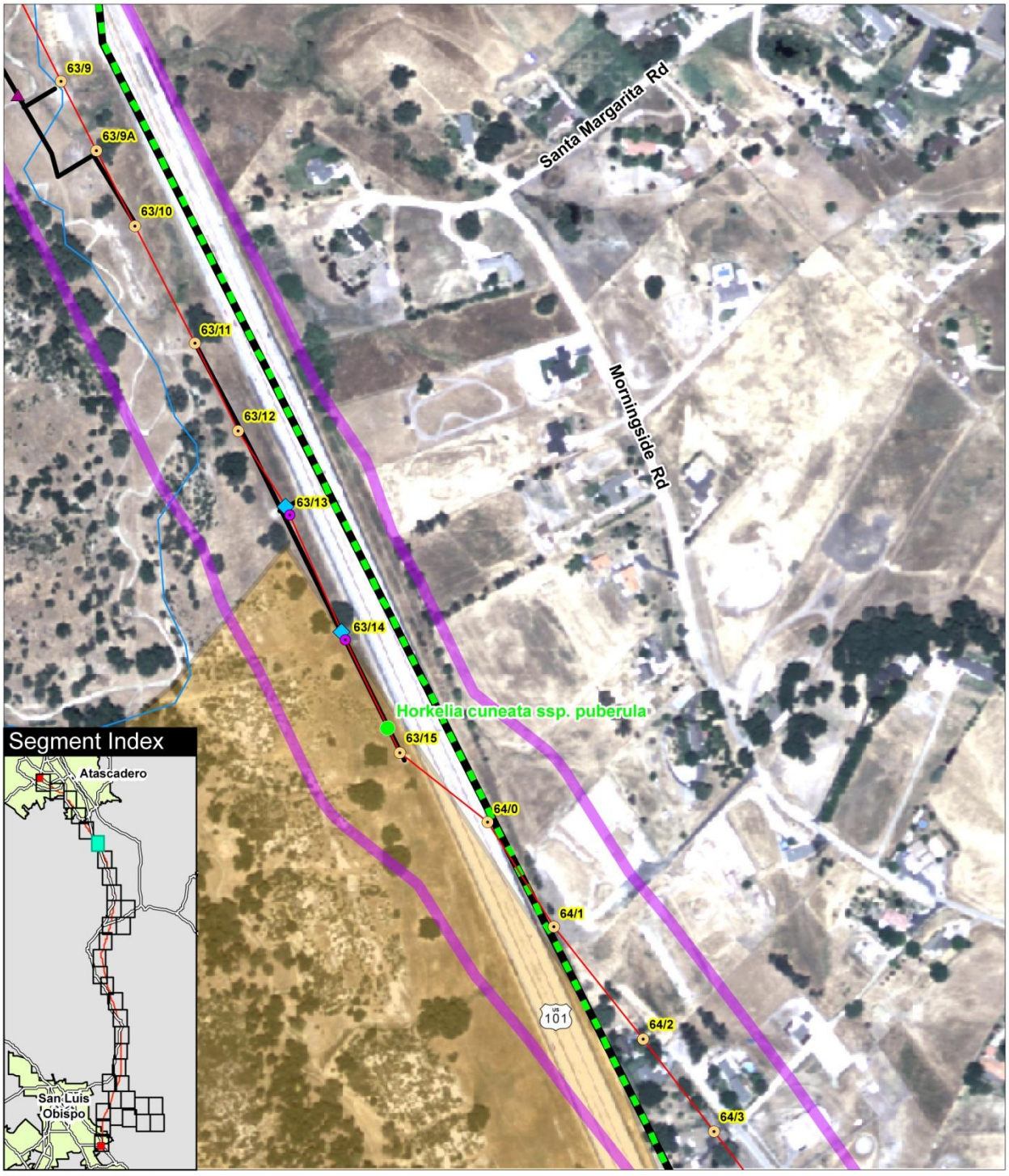
Figure A-6: Power Line Segment (6 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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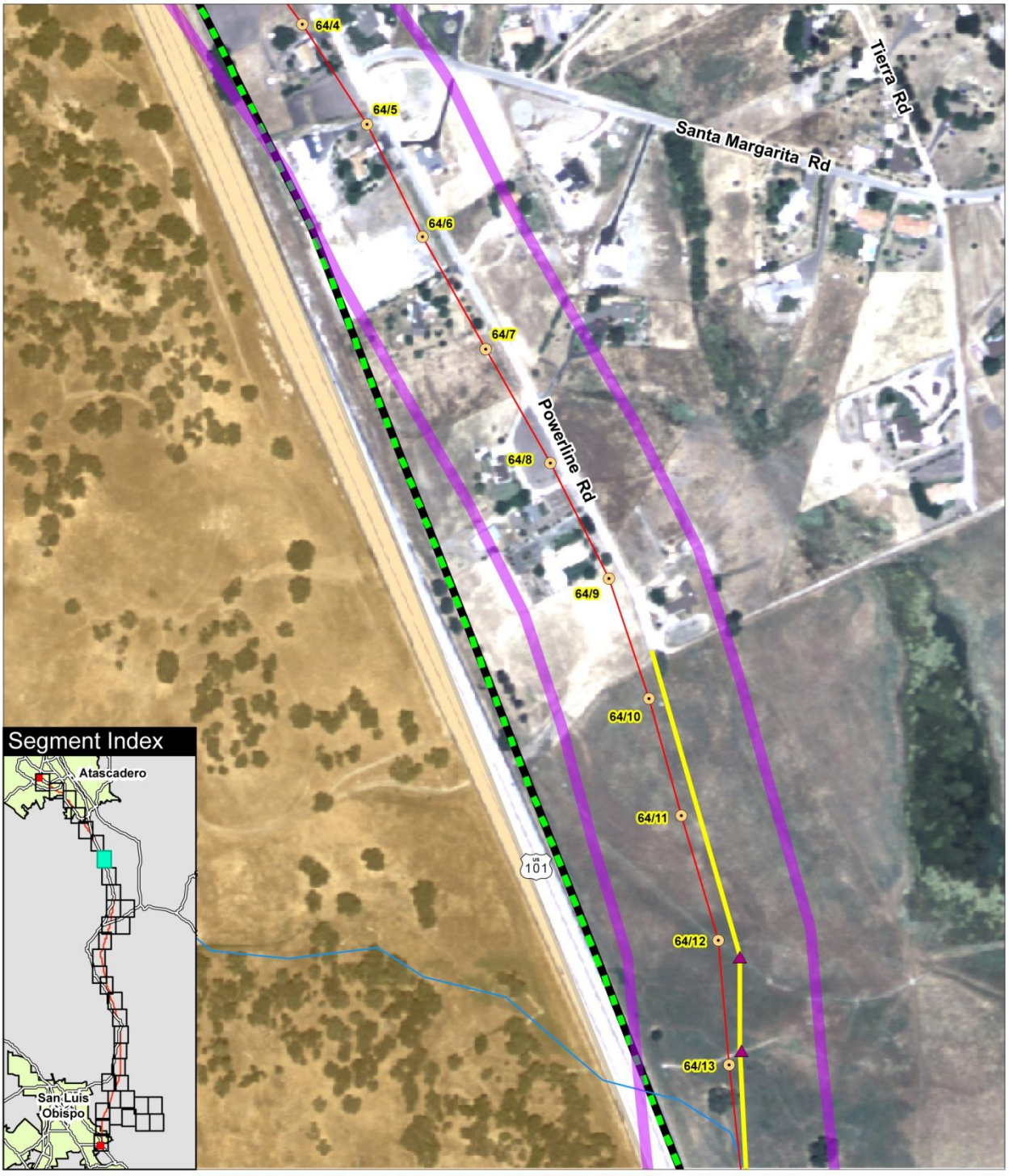
Figure A-7: Power Line Segment (7 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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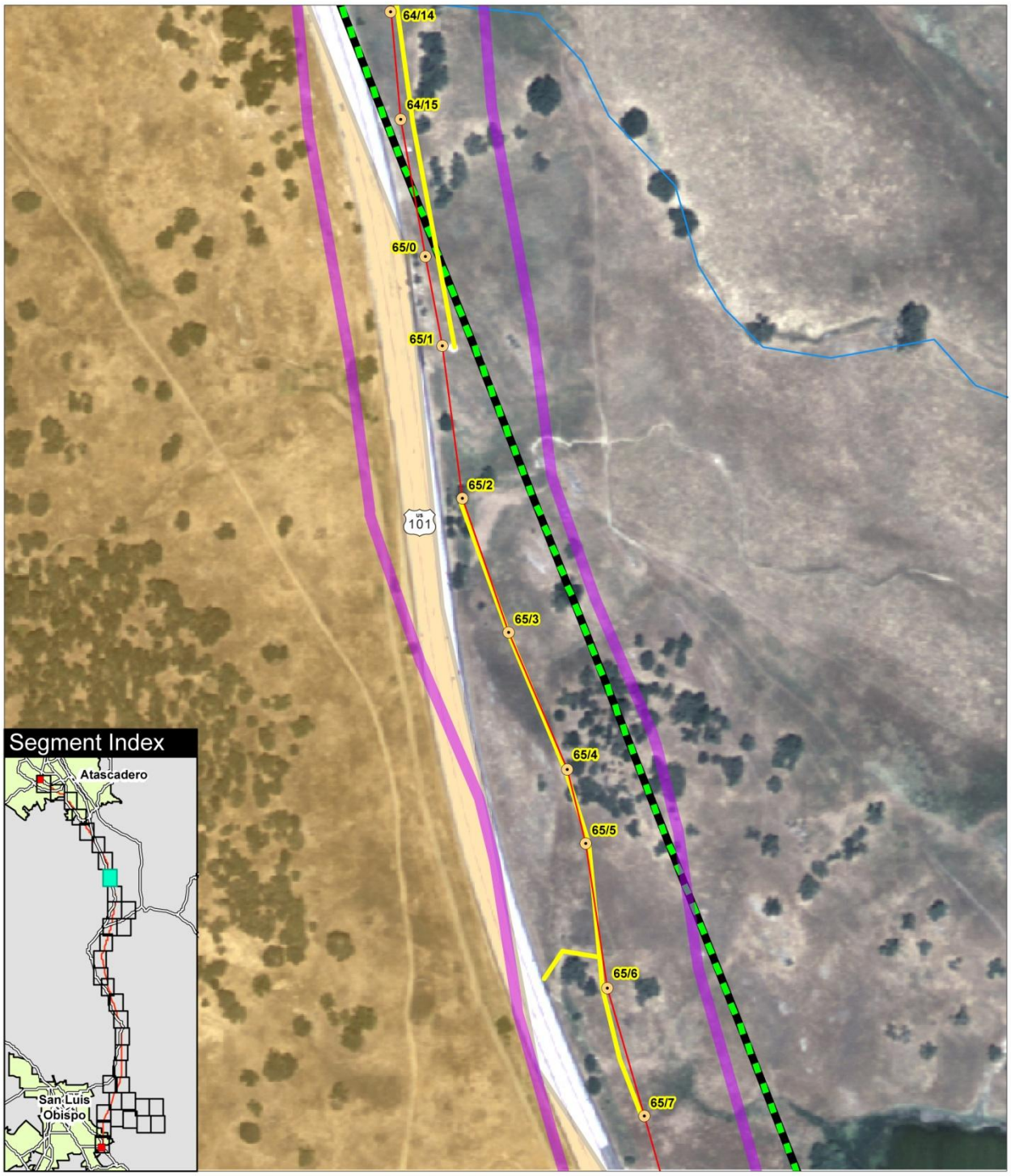
Figure A-8: Power Line Segment (8 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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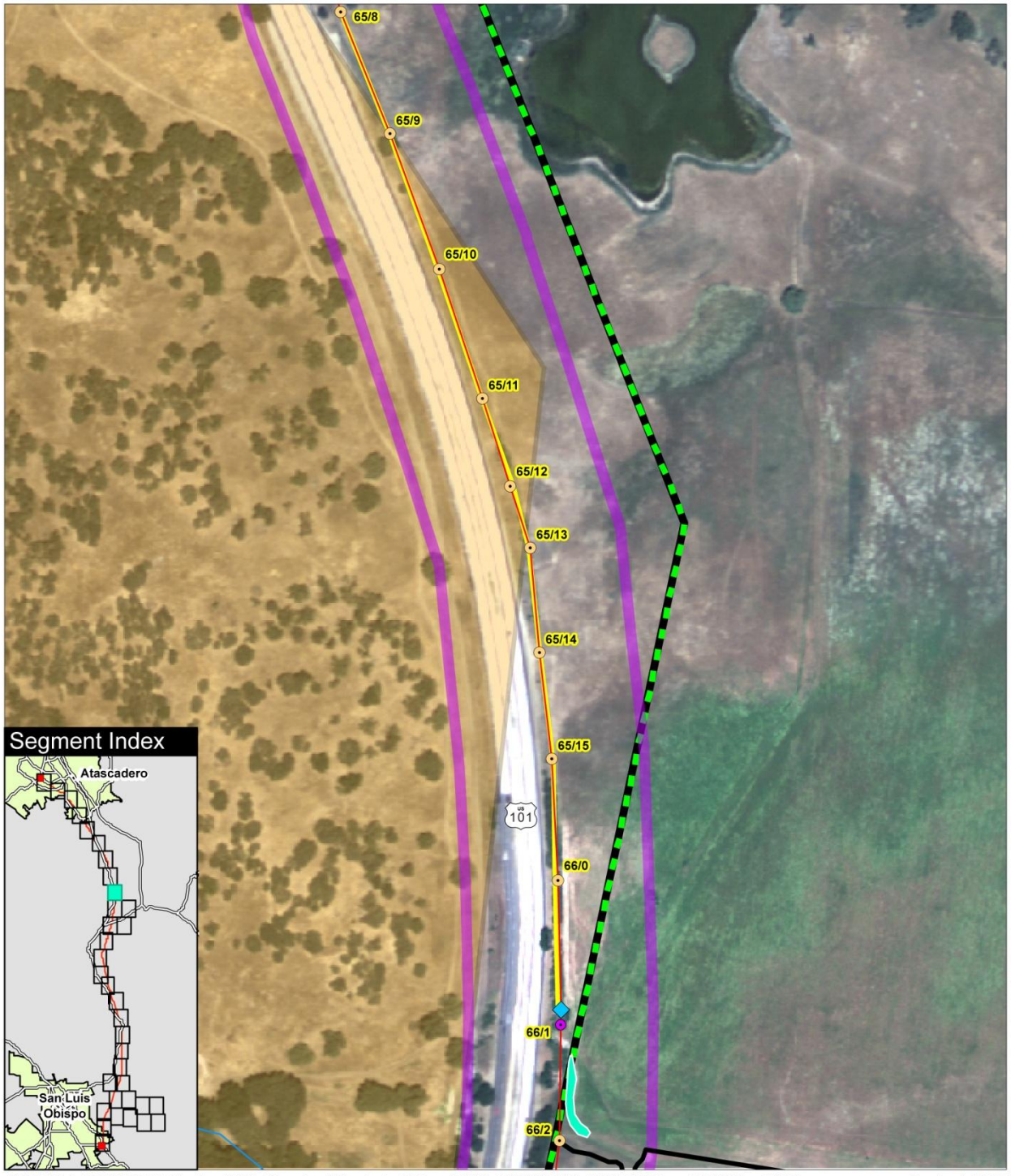
Figure A-9: Power Line Segment (9 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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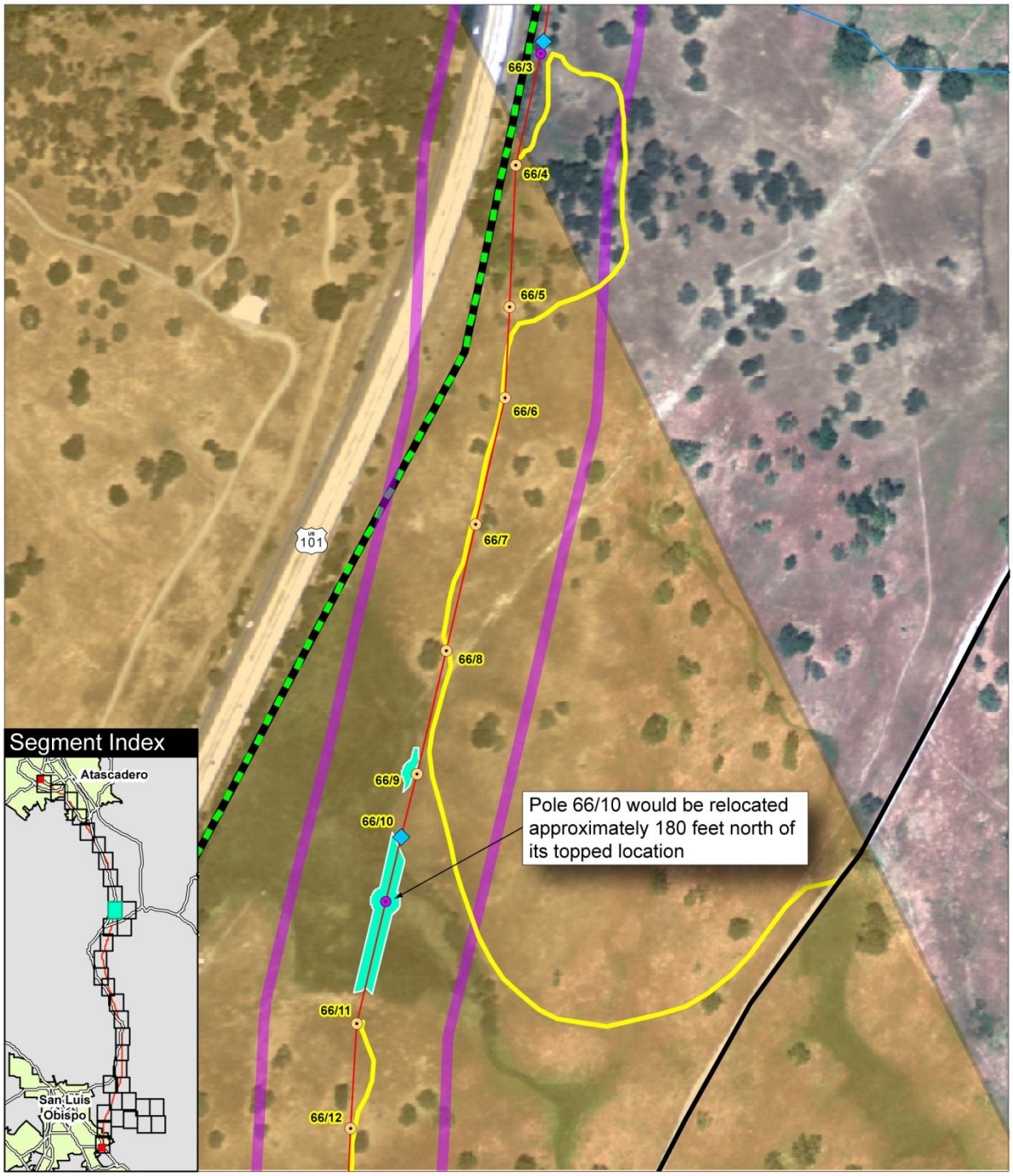
Figure A-10: Power Line Segment (10 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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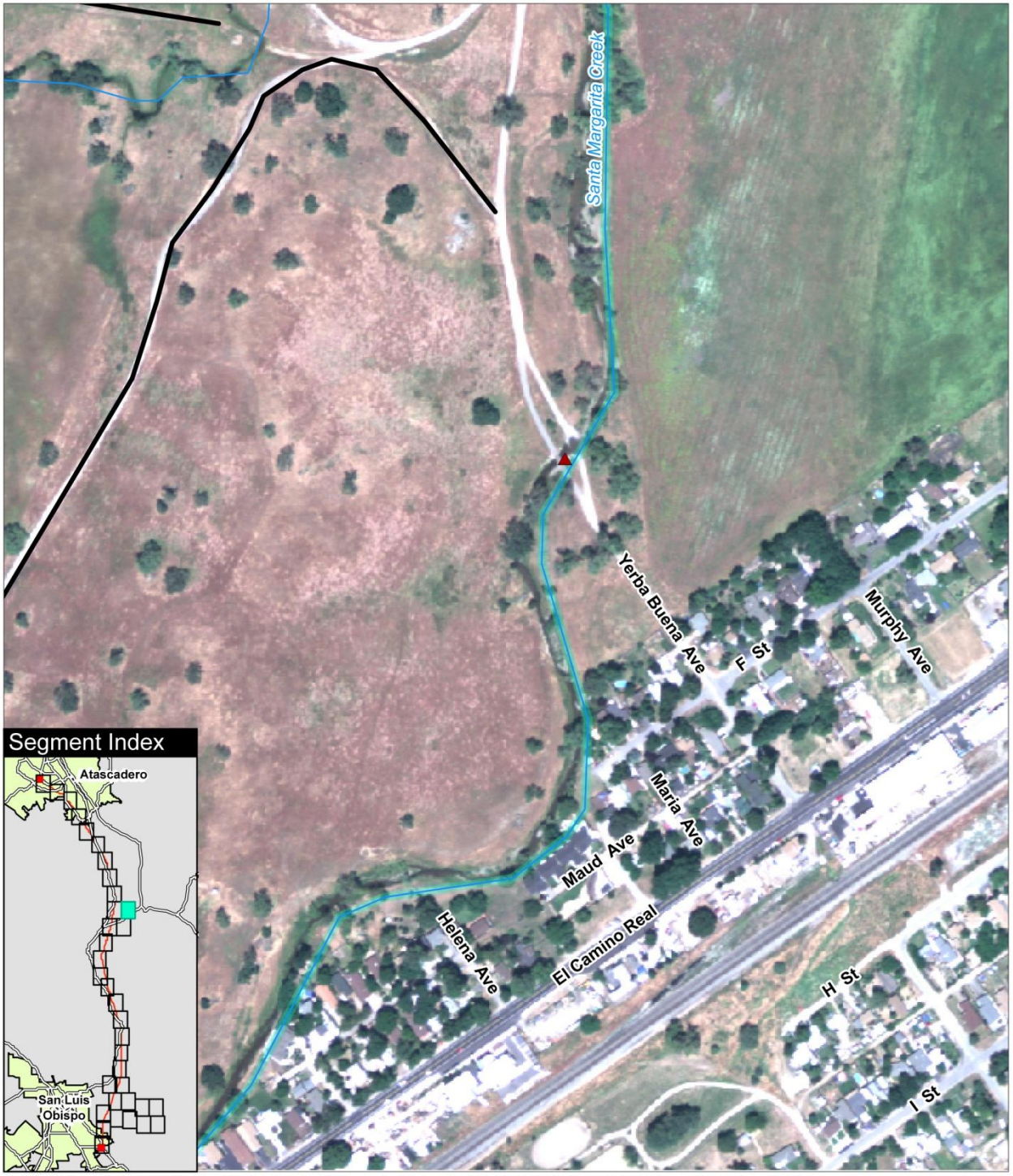
Figure A-11: Power Line Segment (11 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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Figure A-12: Power Line Segment (12 of 35)

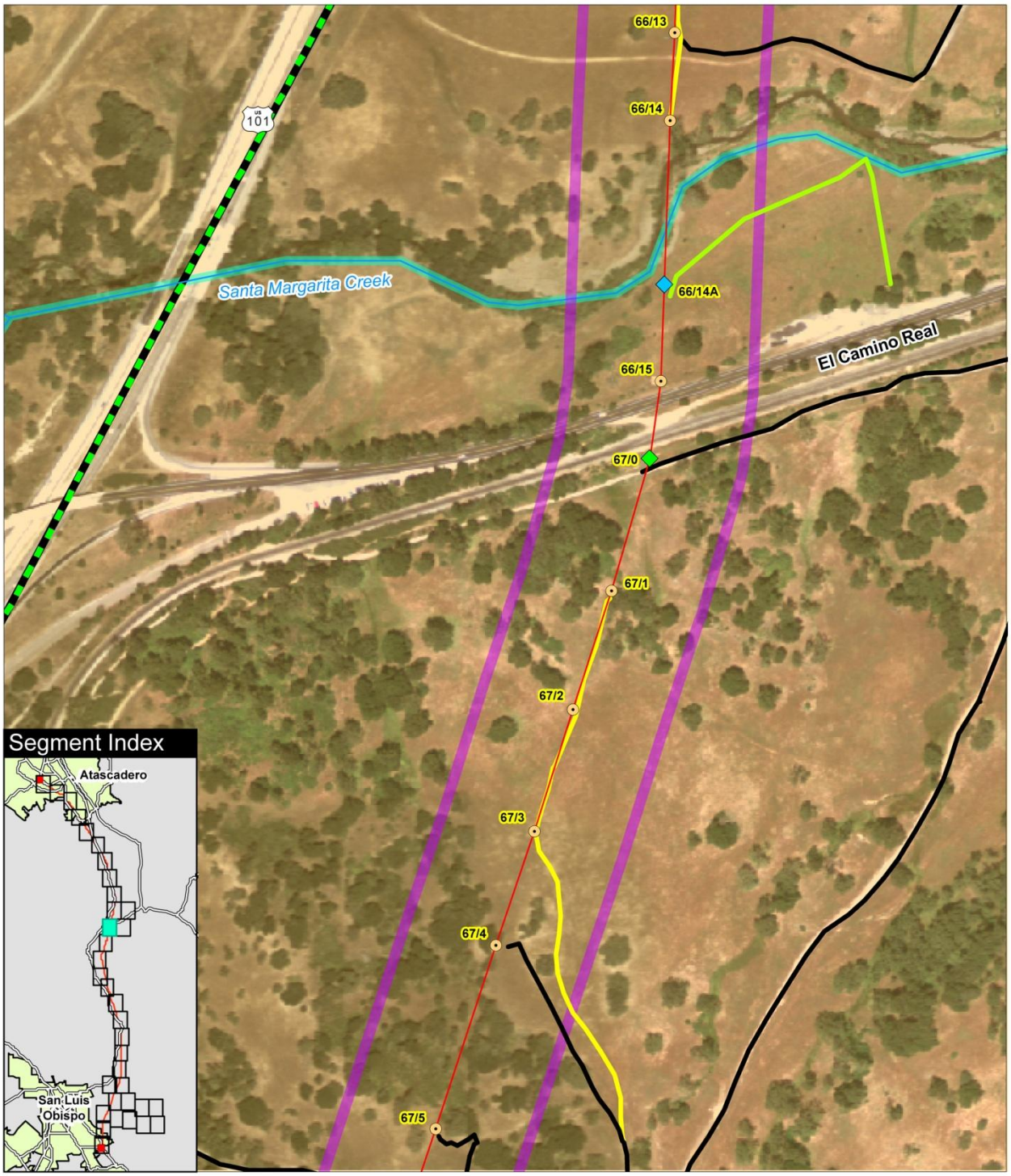
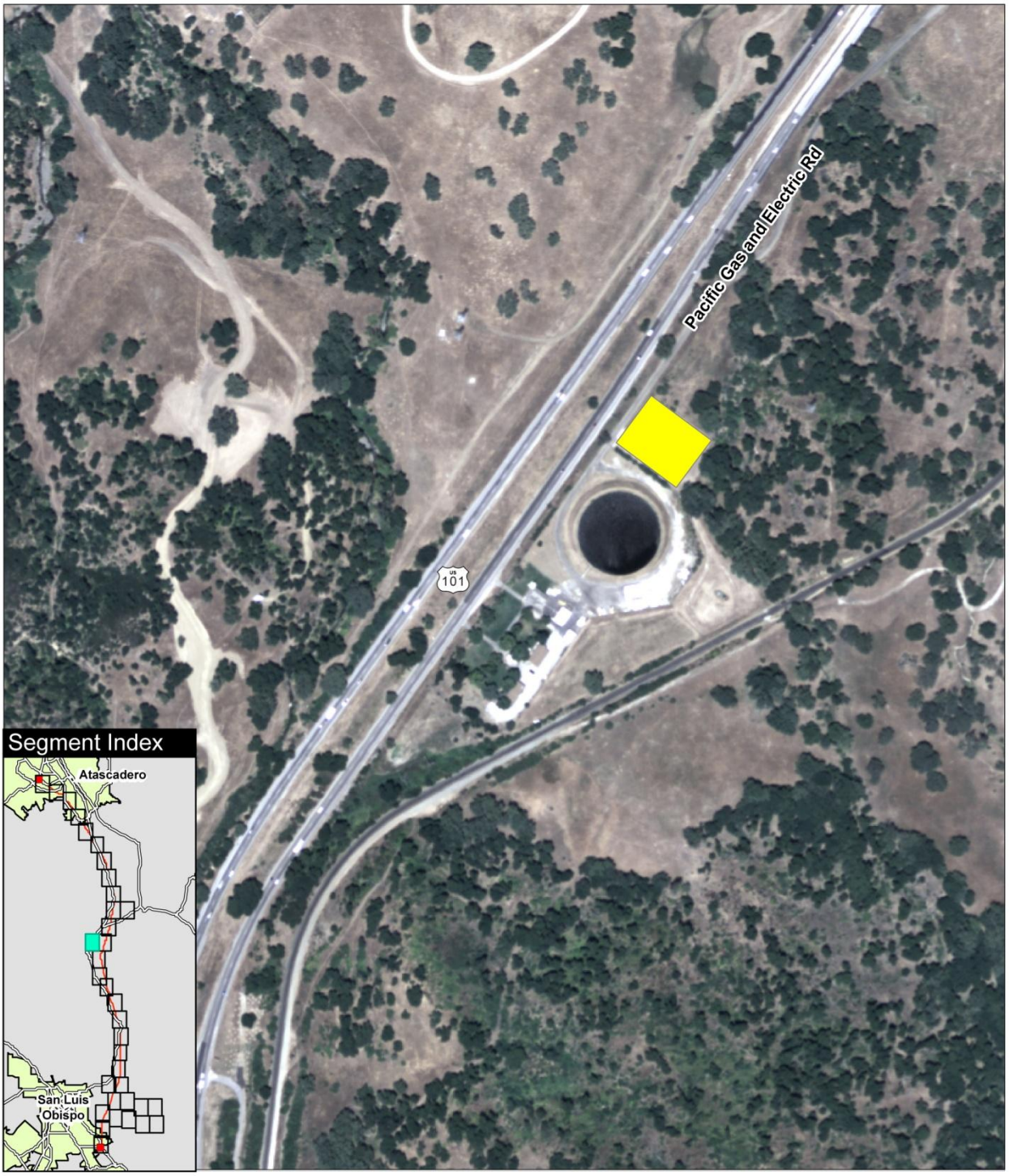


Figure A-13: Power Line Segment (13 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

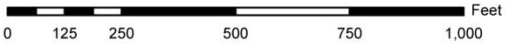

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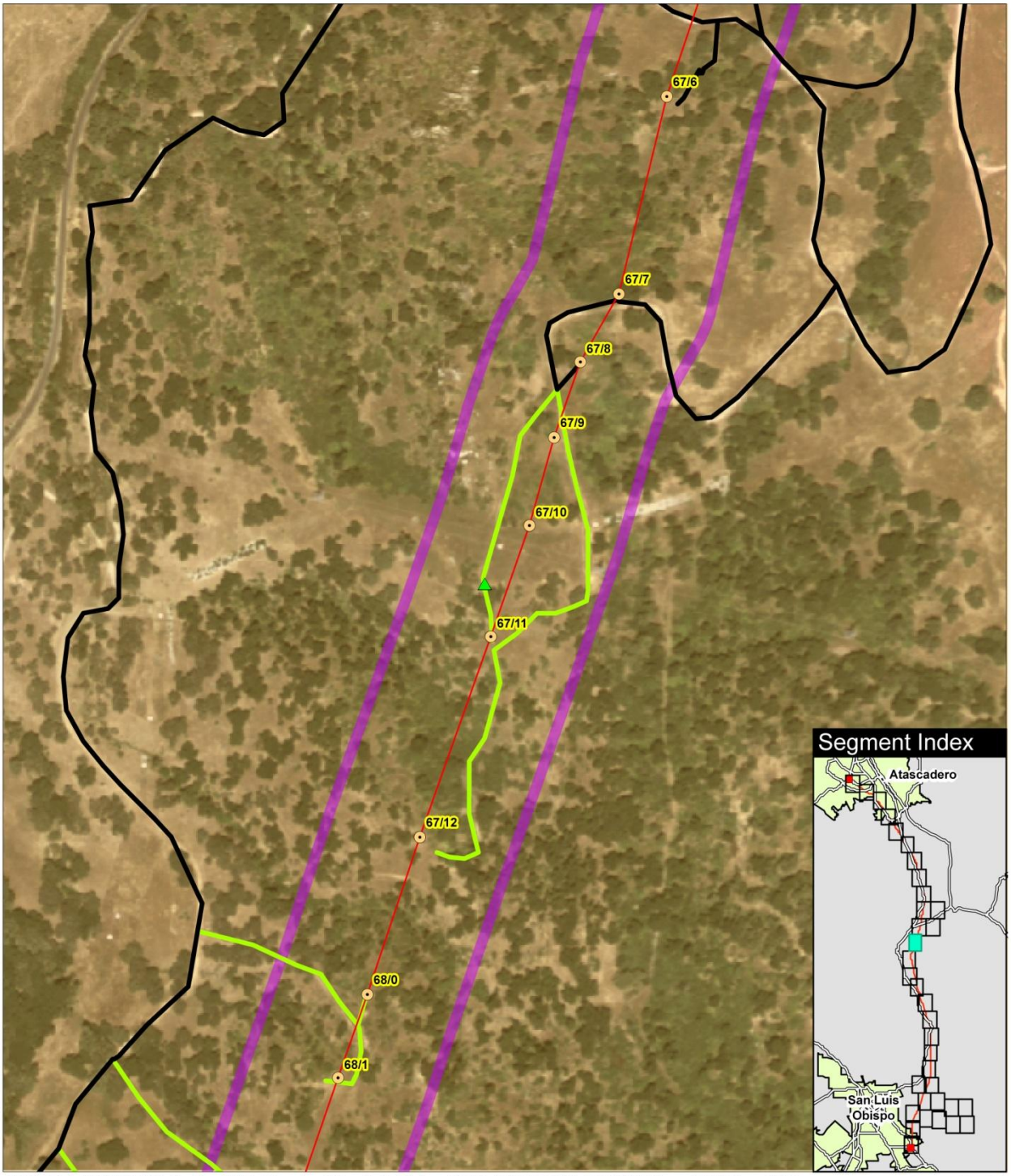
Figure A-14: Power Line Segment (14 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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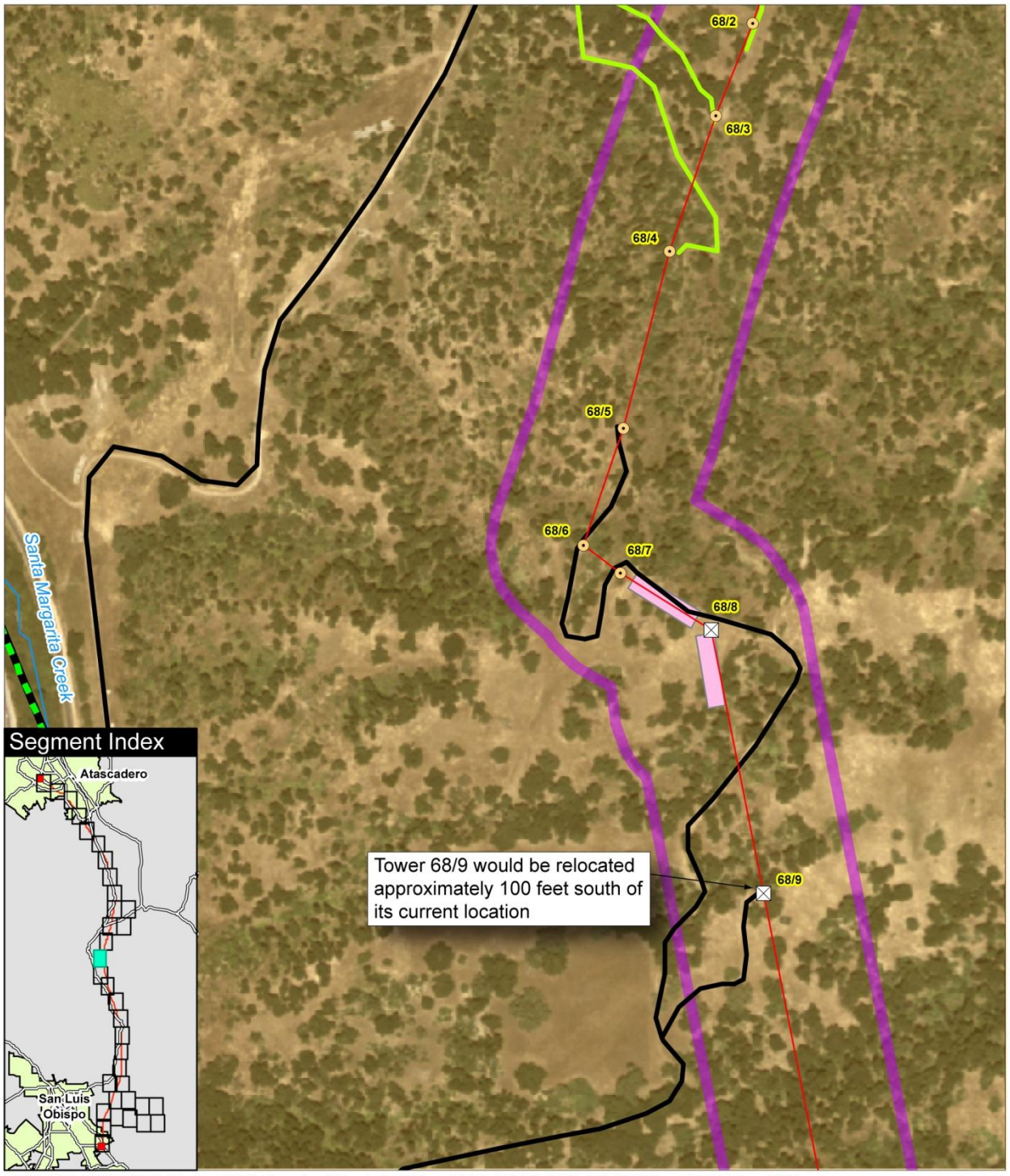
Figure A-15: Power Line Segment (15 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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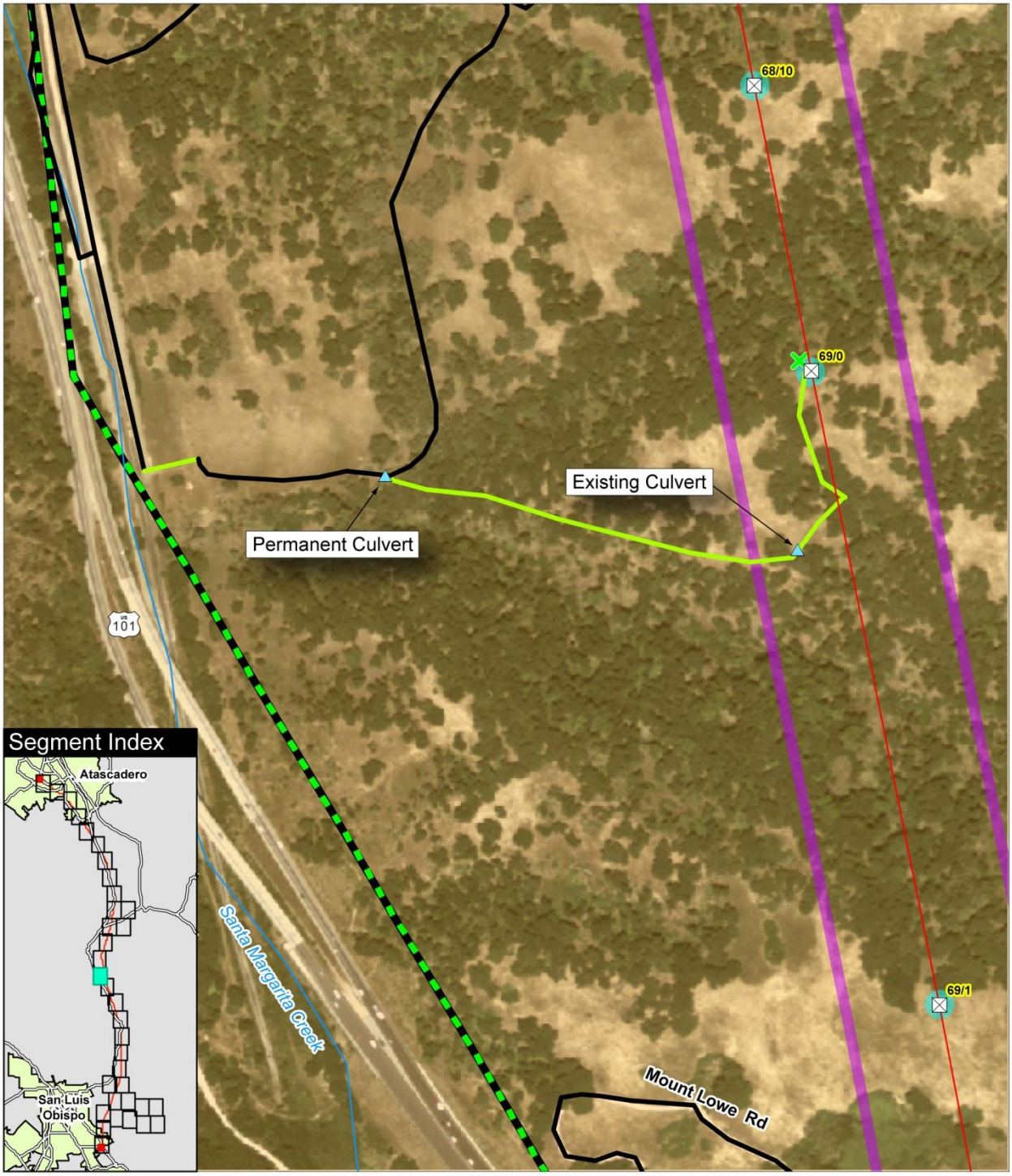
Figure A-16: Power Line Segment (16 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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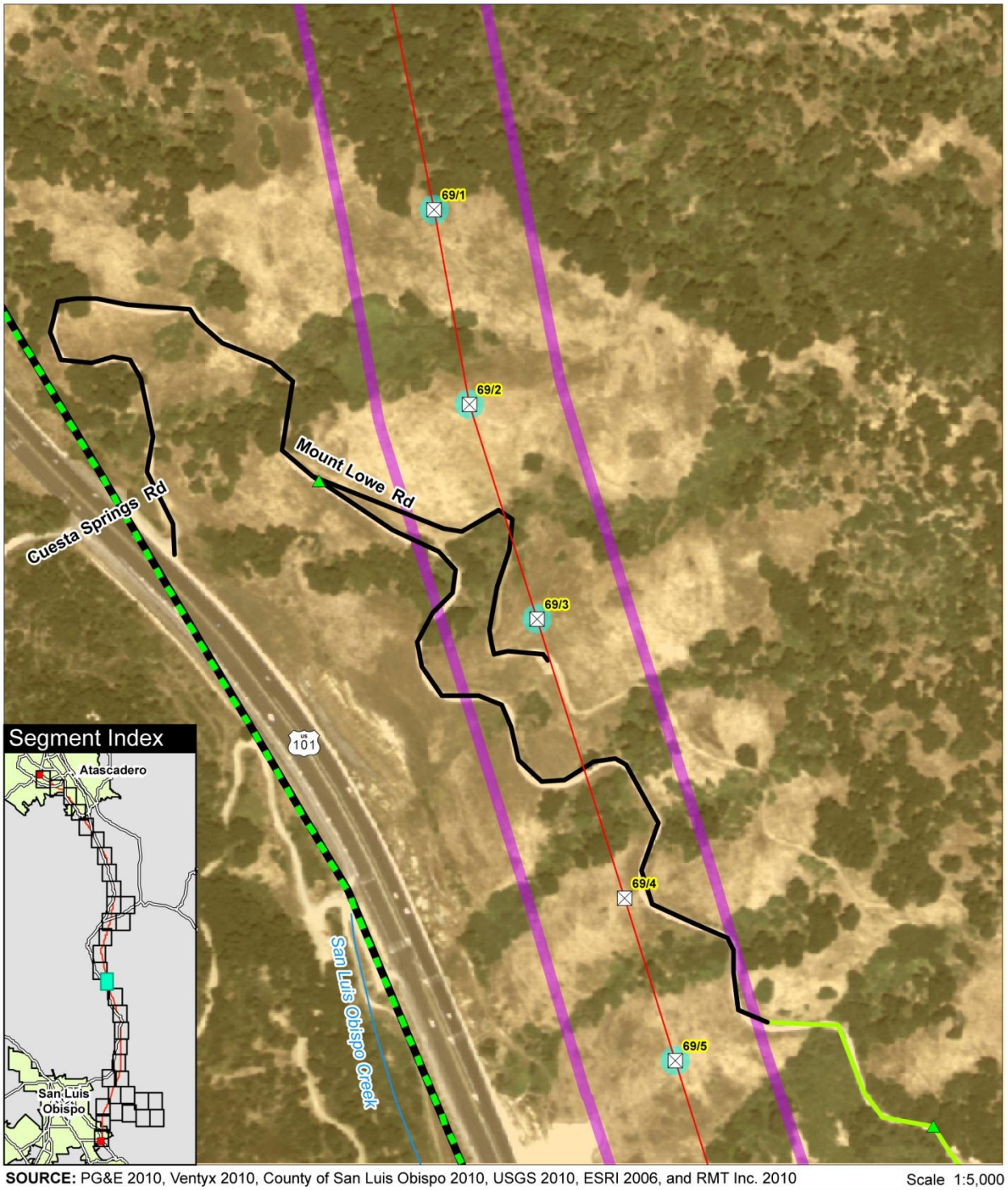
Figure A-17: Power Line Segment (17 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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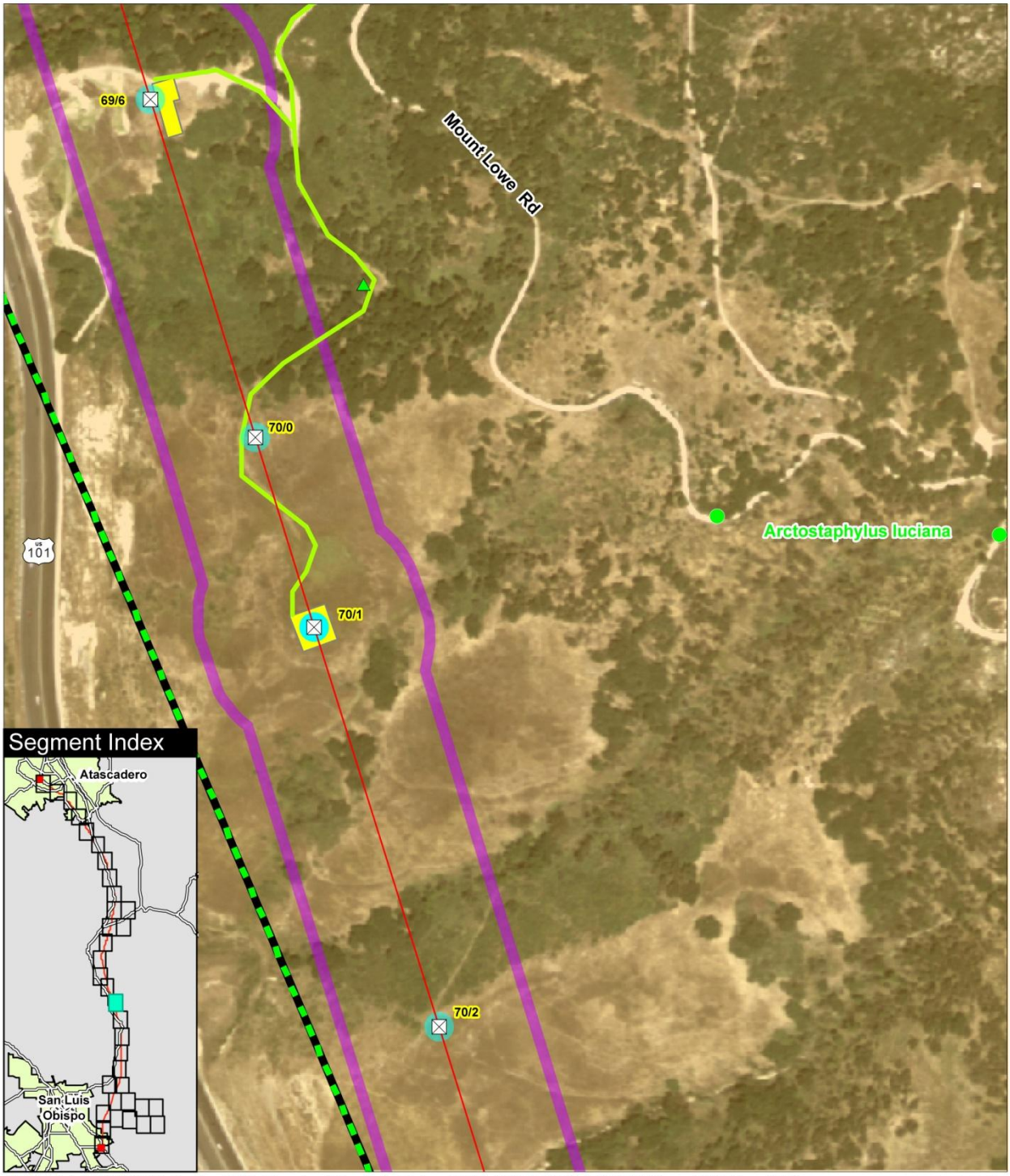
Figure A-18: Power Line Segment (18 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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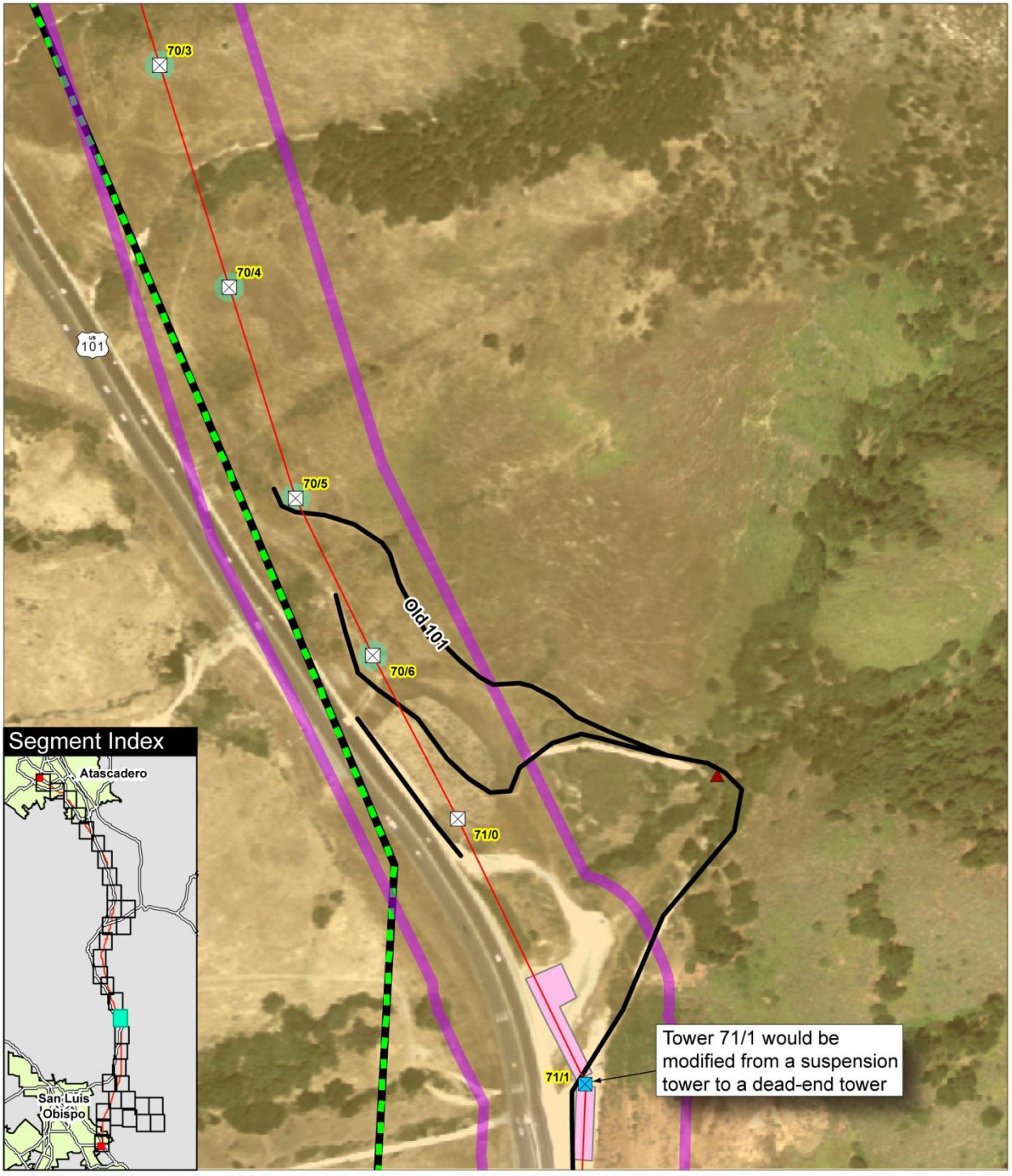
Figure A-19: Power Line Segment (19 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010 Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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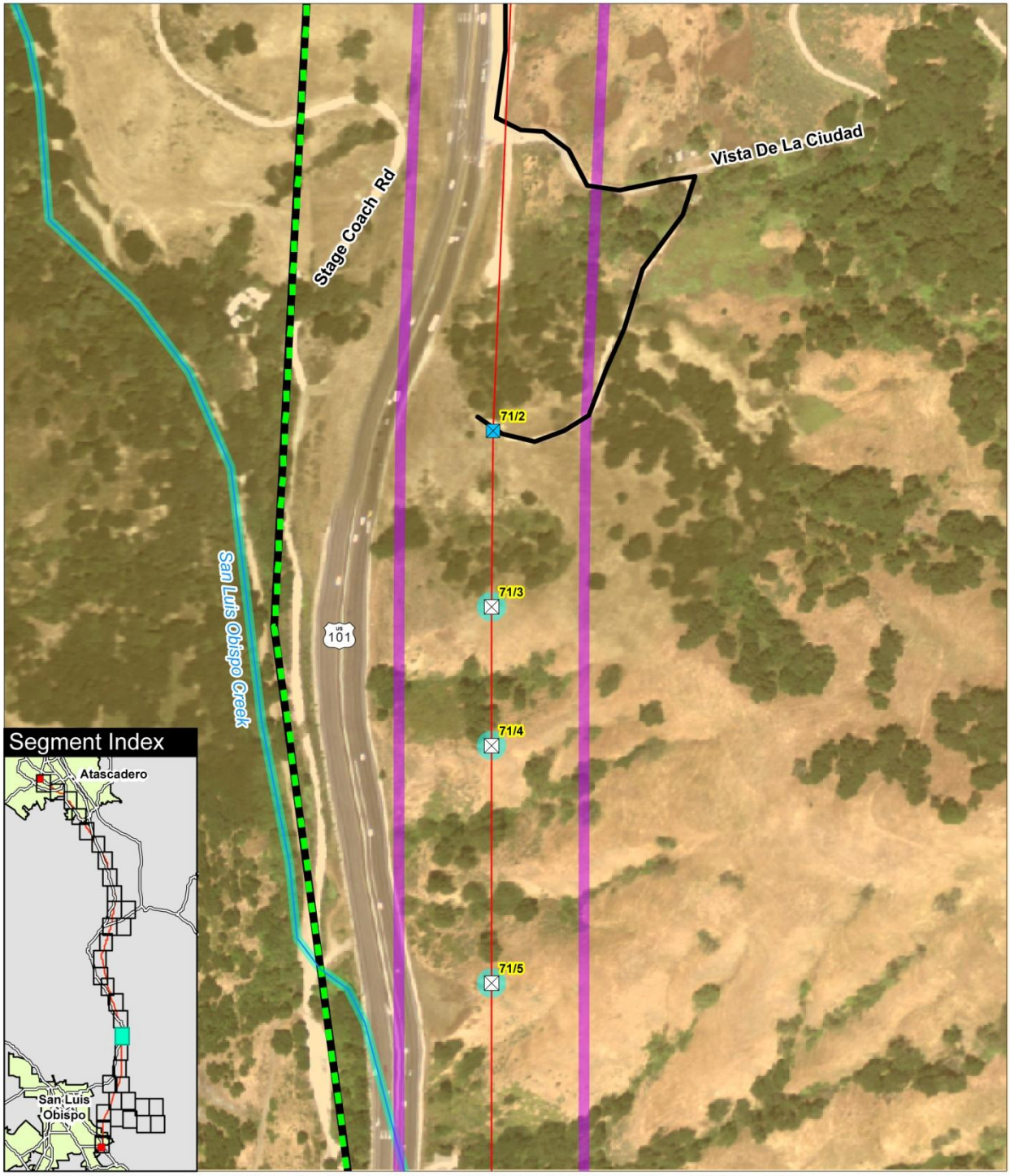
Figure A-20: Power Line Segment (20 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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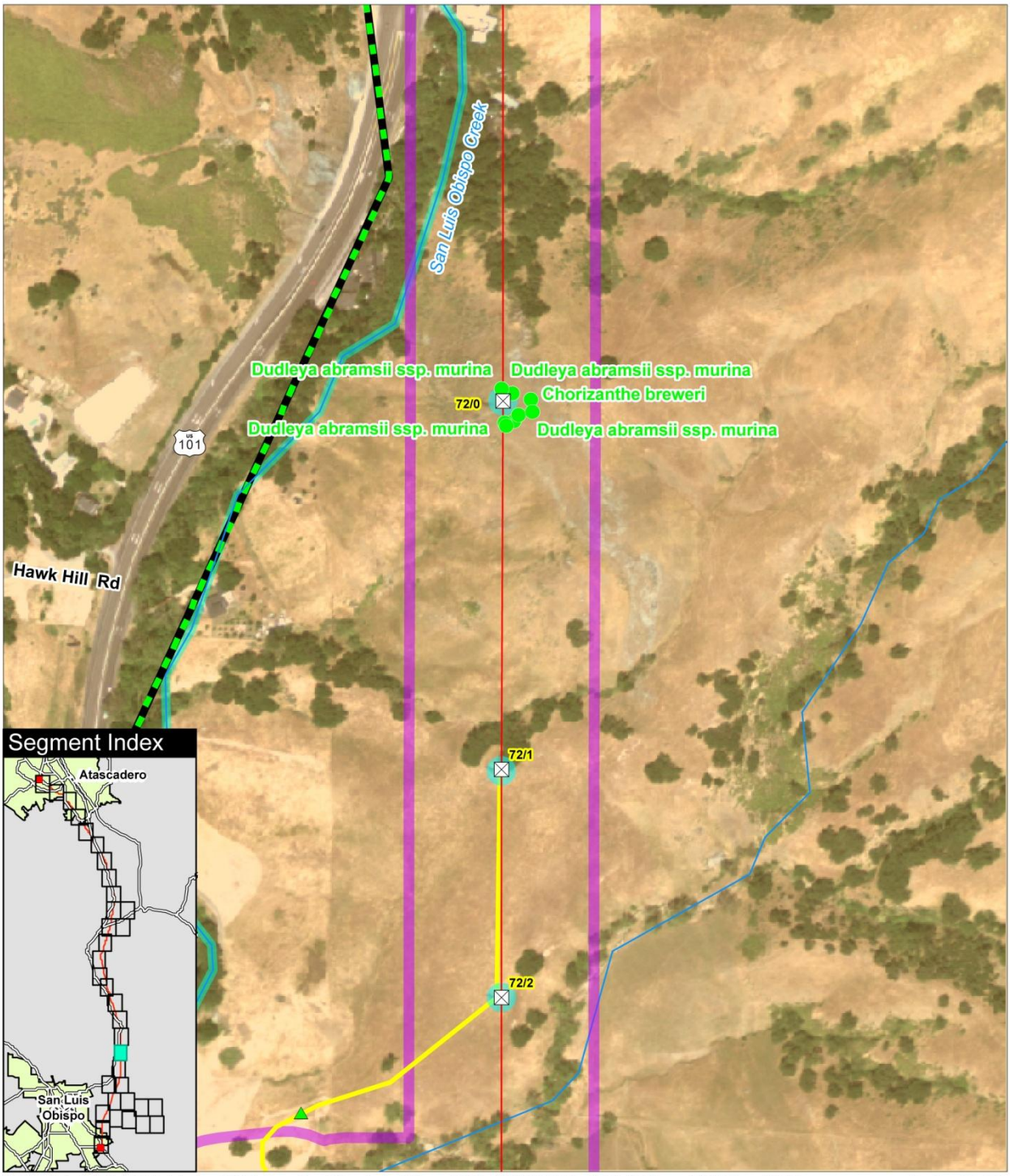
Figure A-21: Power Line Segment (21 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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* Refer to Figure 2.4-0 for legend explanation

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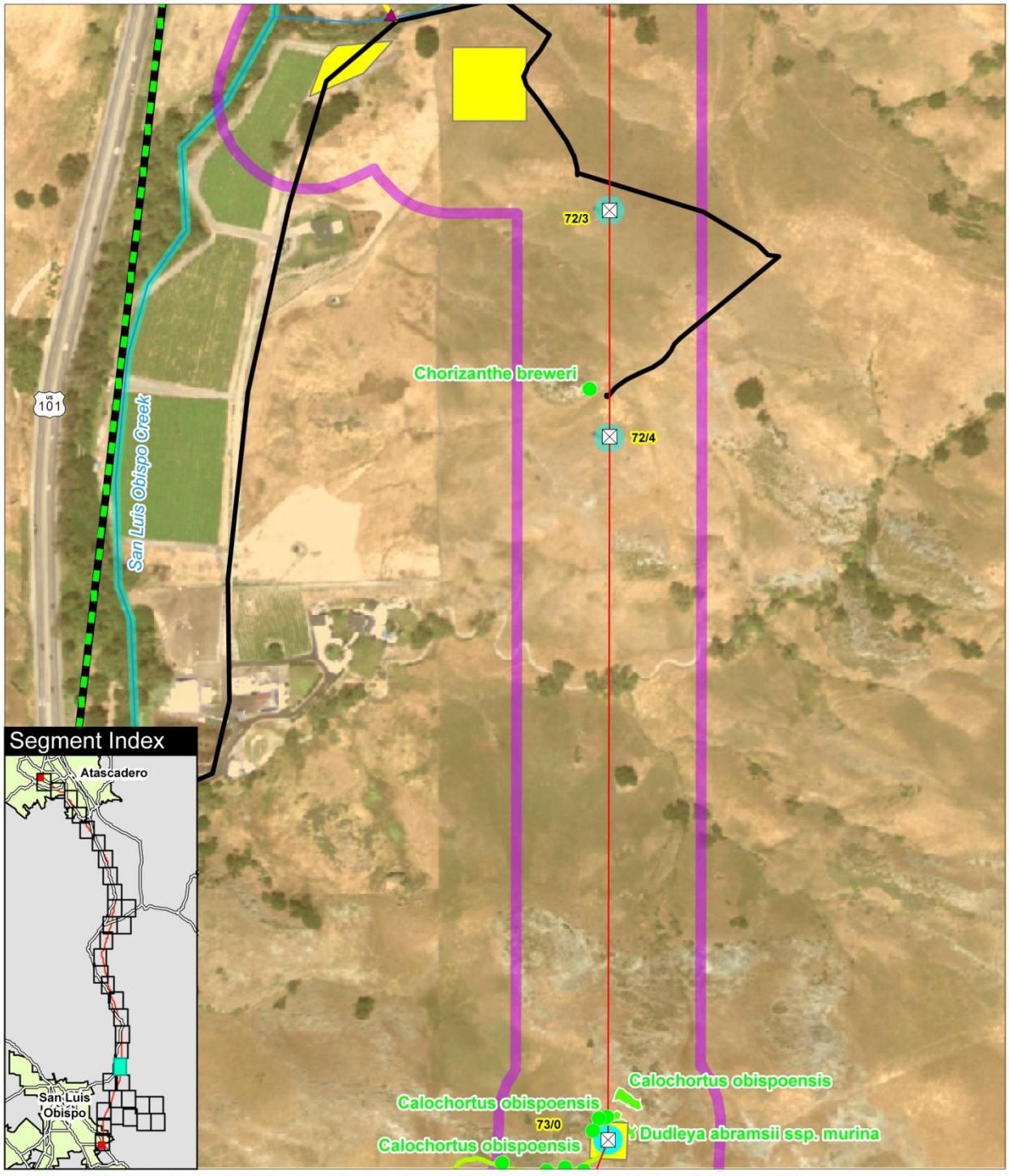
Figure A-22: Power Line Segment (22 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

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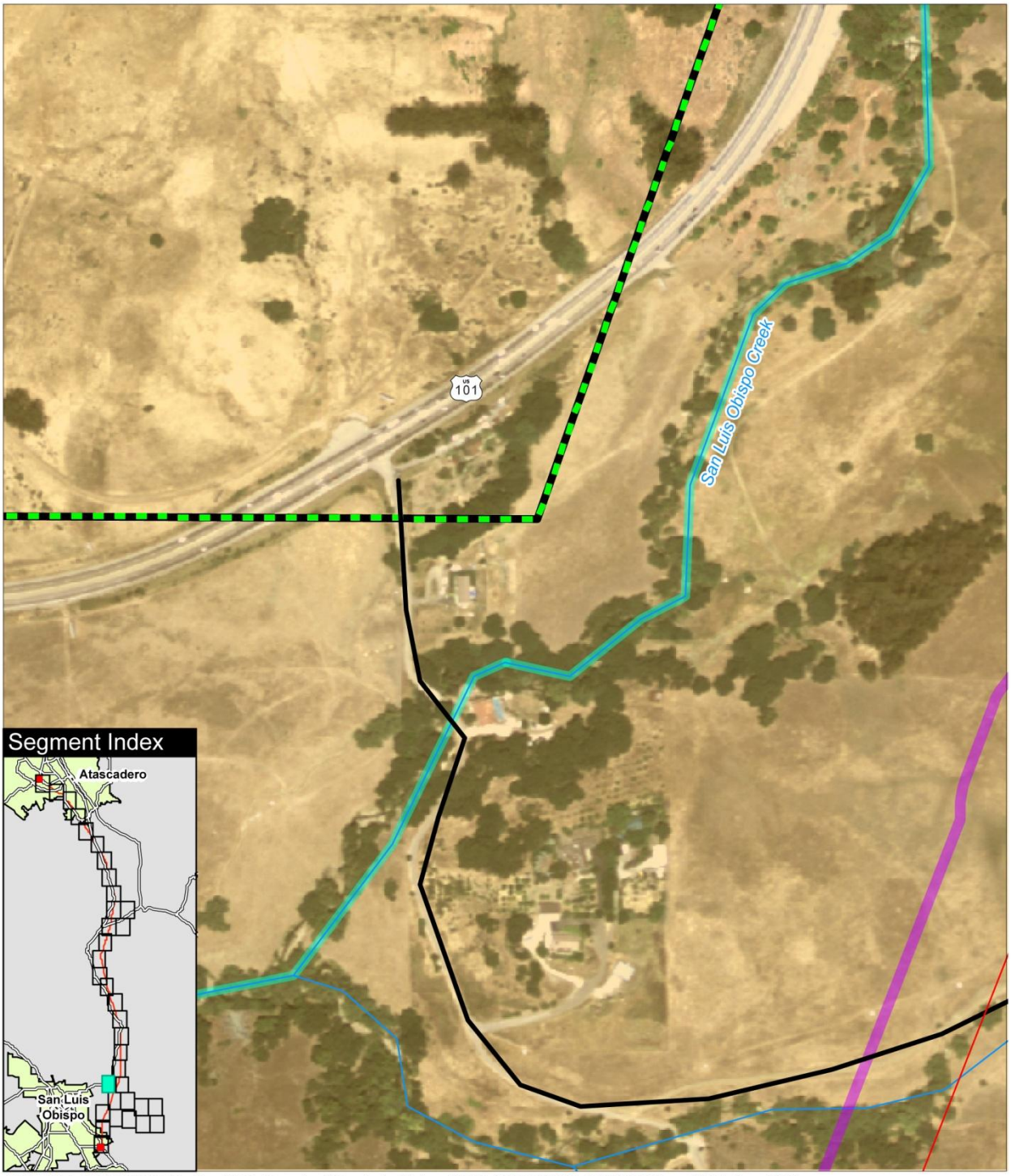
Figure A-23: Power Line Segment (23 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

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* Refer to Figure 2.4-0 for legend explanation

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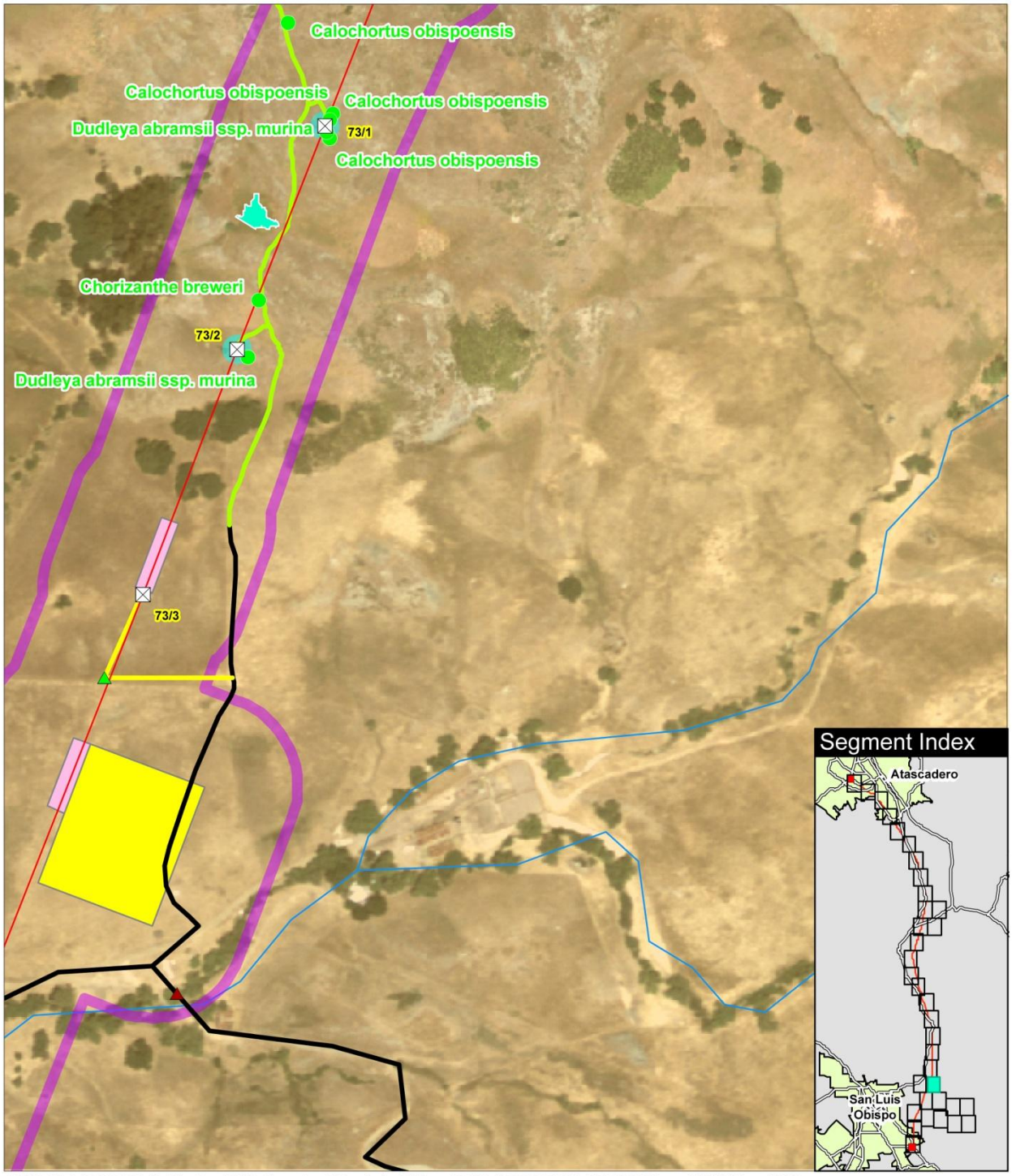
Figure A-24: Power Line Segment (24 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

N W E S

* Refer to Figure 2.4-0 for legend explanation

0 125 250 500 750 1,000 Feet

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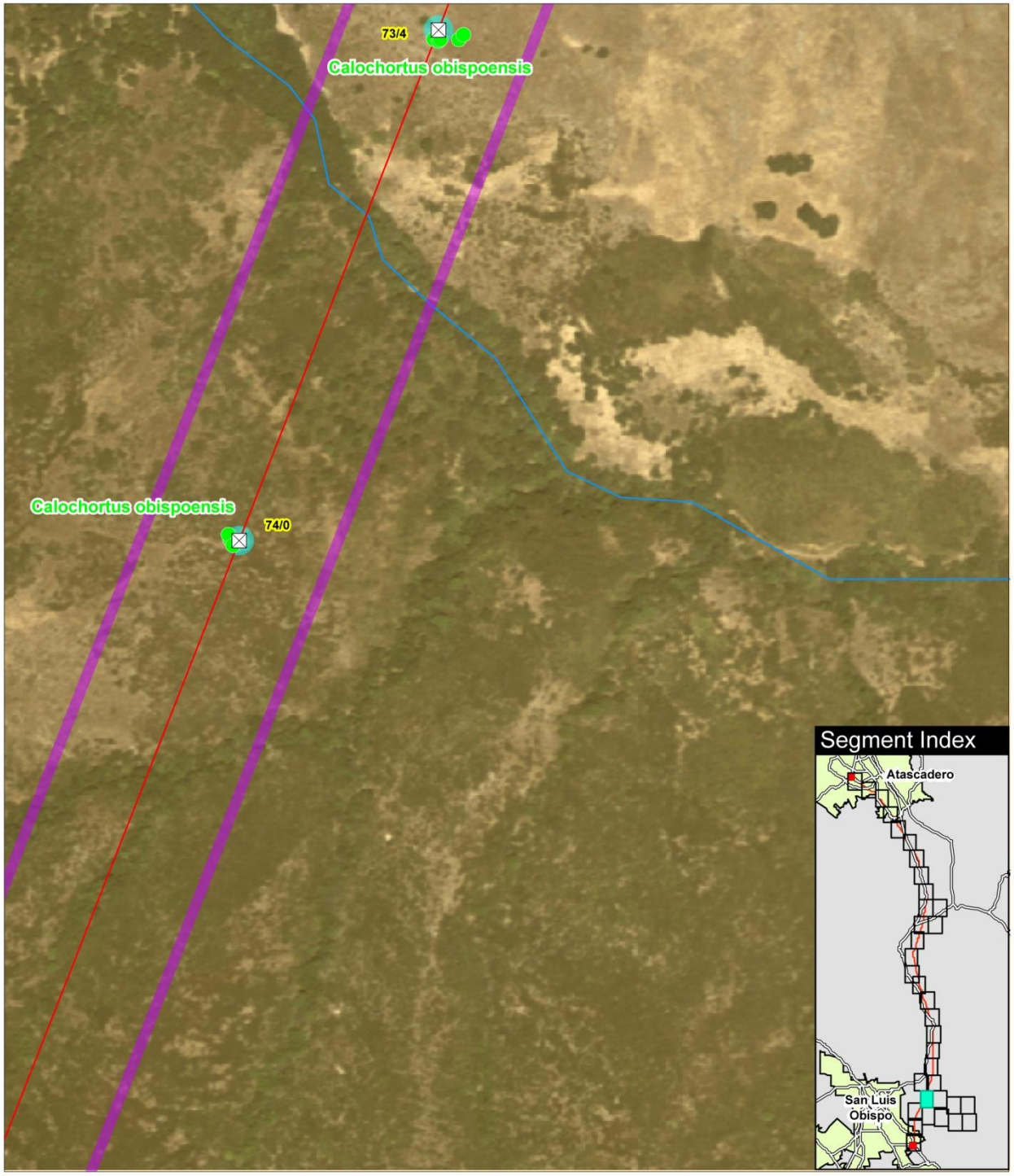
Figure A-25: Power Line Segment (25 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

N W E S

Feet

0 125 250 500 750 1,000

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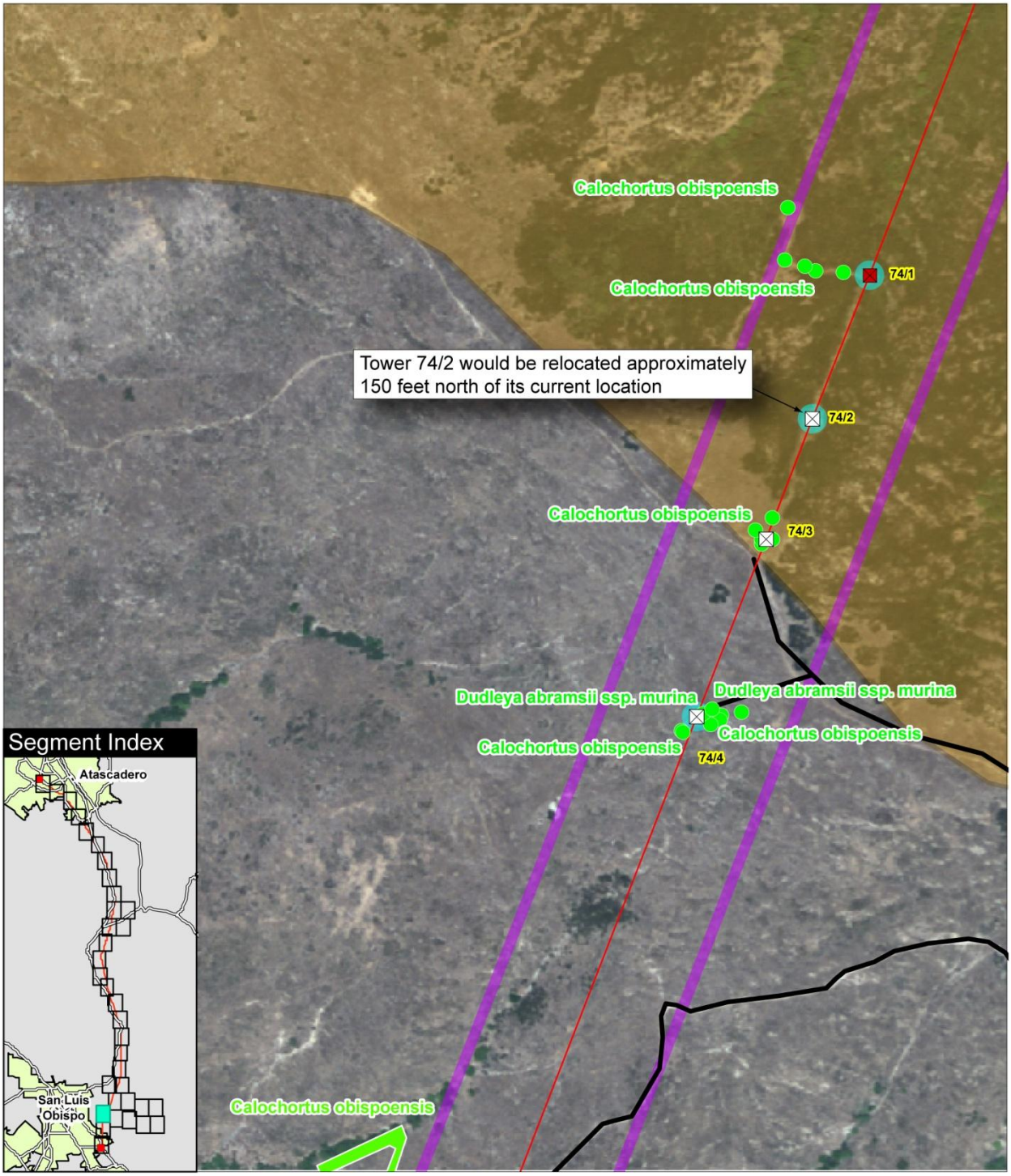
Figure A-26: Power Line Segment (26 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

N W E S

0 125 250 500 750 1,000 Feet

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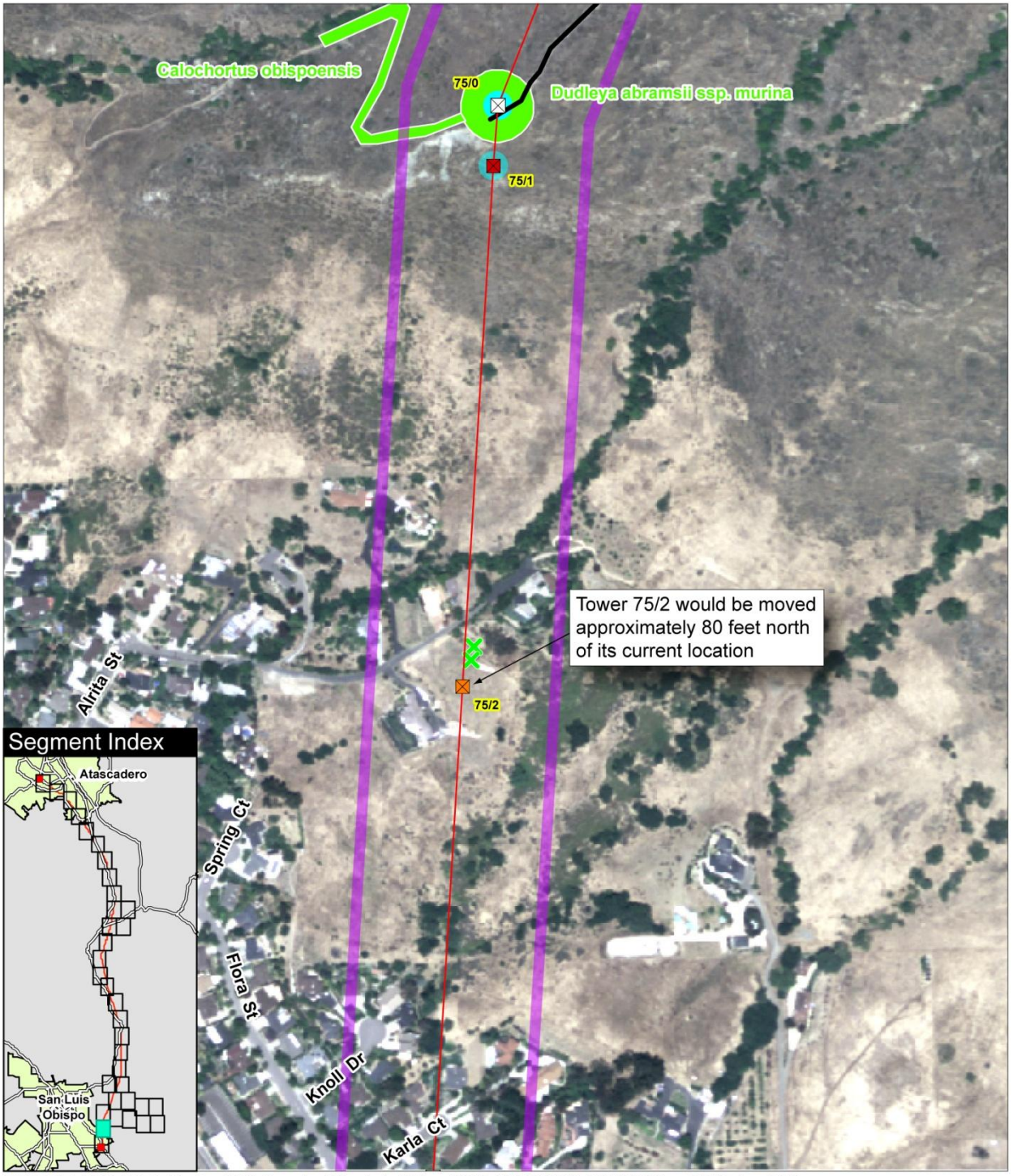
Figure A-27: Power Line Segment (27 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

Feet
0 125 250 500 750 1,000

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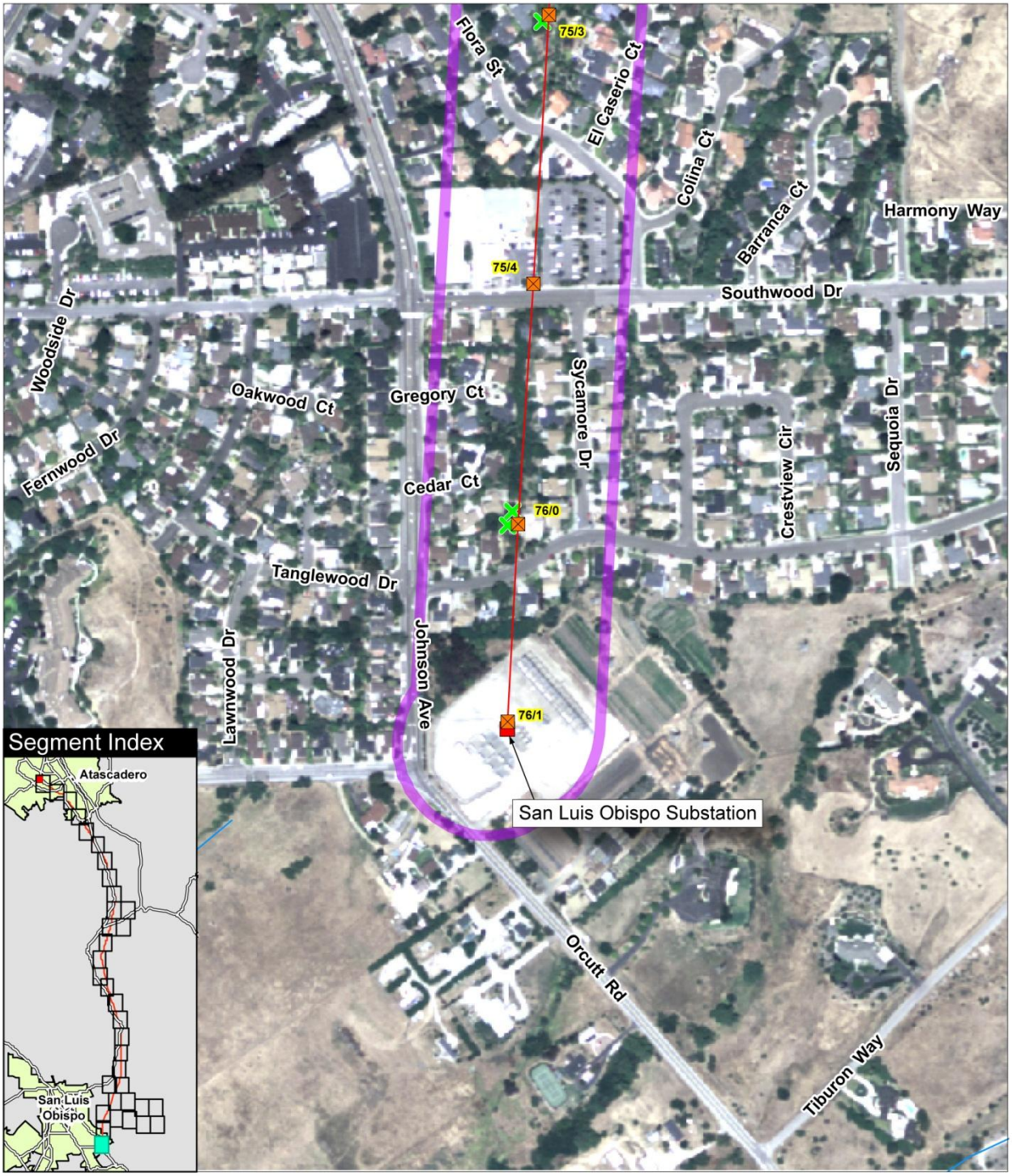
Figure A-28: Power Line Segment (28 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

Feet
0 125 250 500 750 1,000

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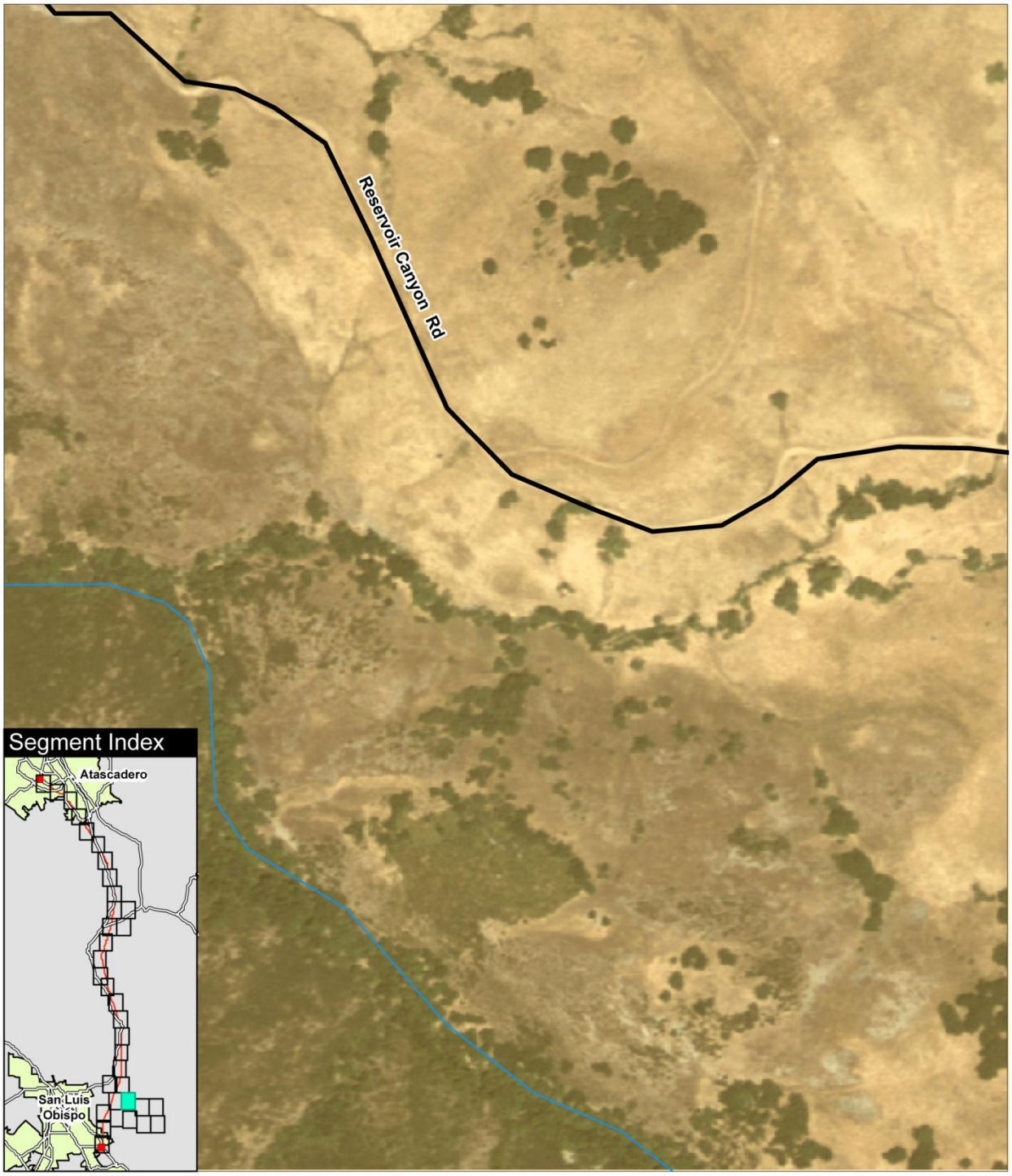
Figure A-29: Power Line Segment (29 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

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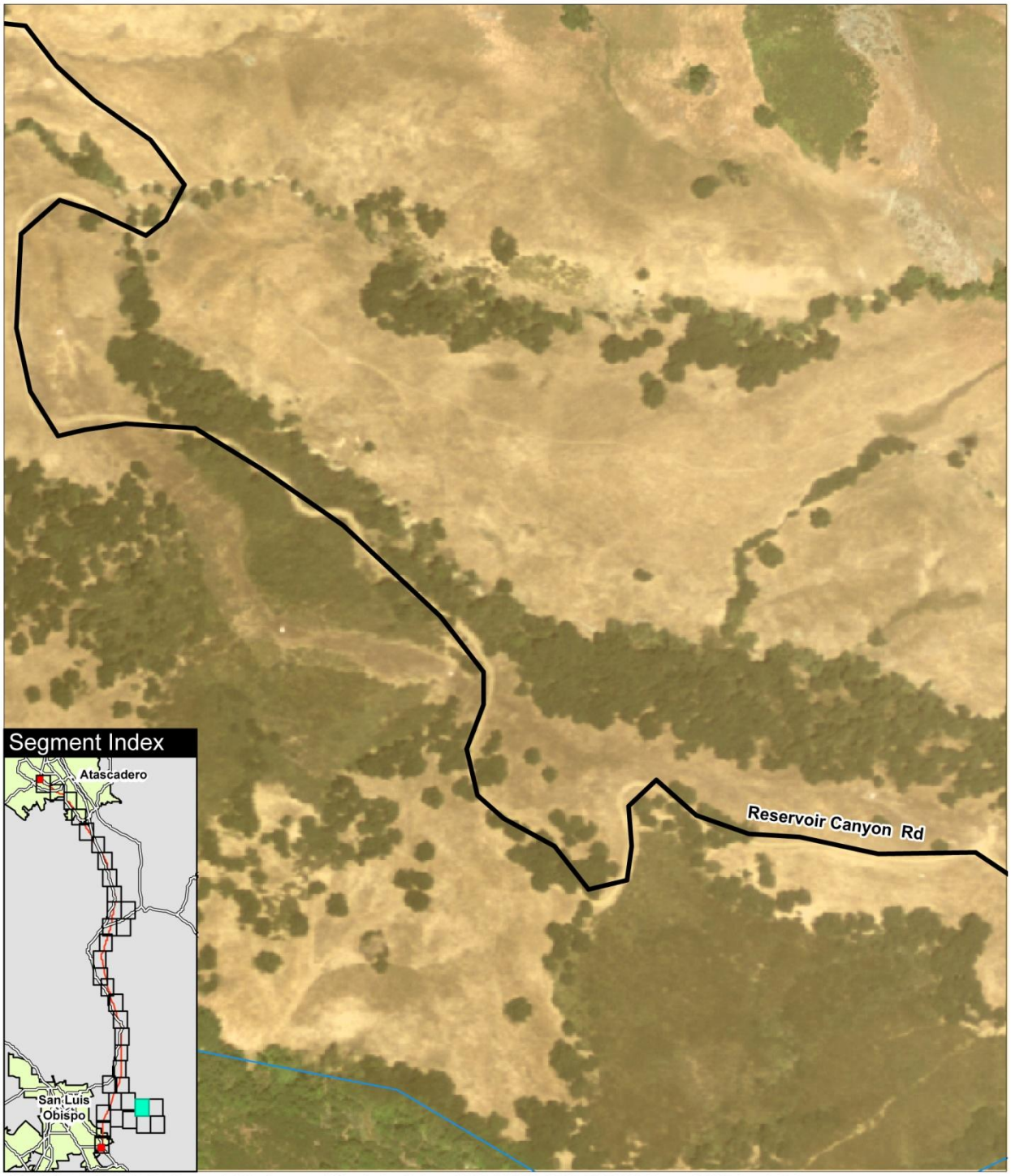
Figure A-30: Power Line Segment (30 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

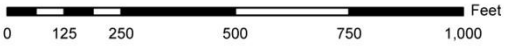


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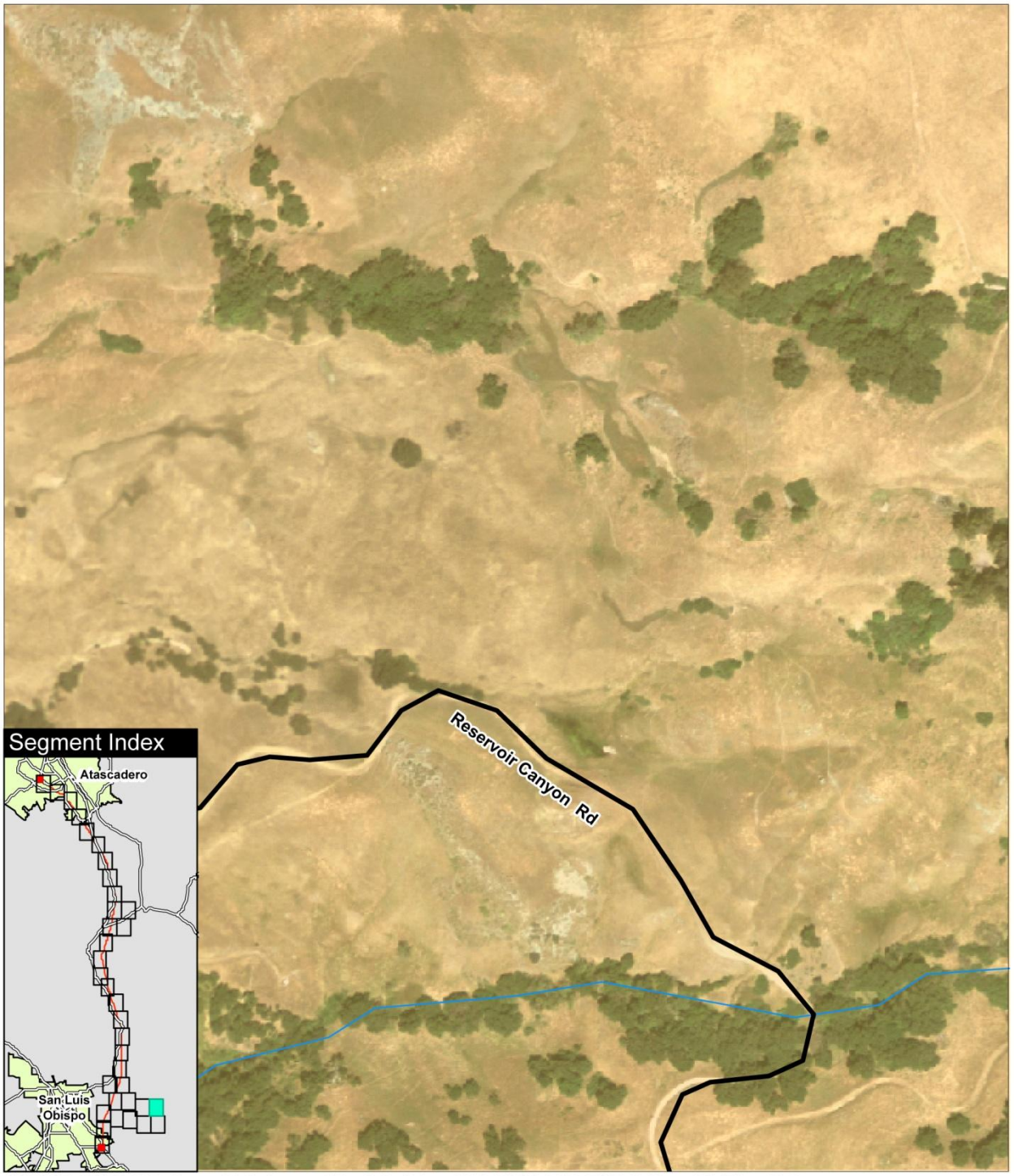
Figure A-31: Power Line Segment (31 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

N W E S

Feet
0 125 250 500 750 1,000

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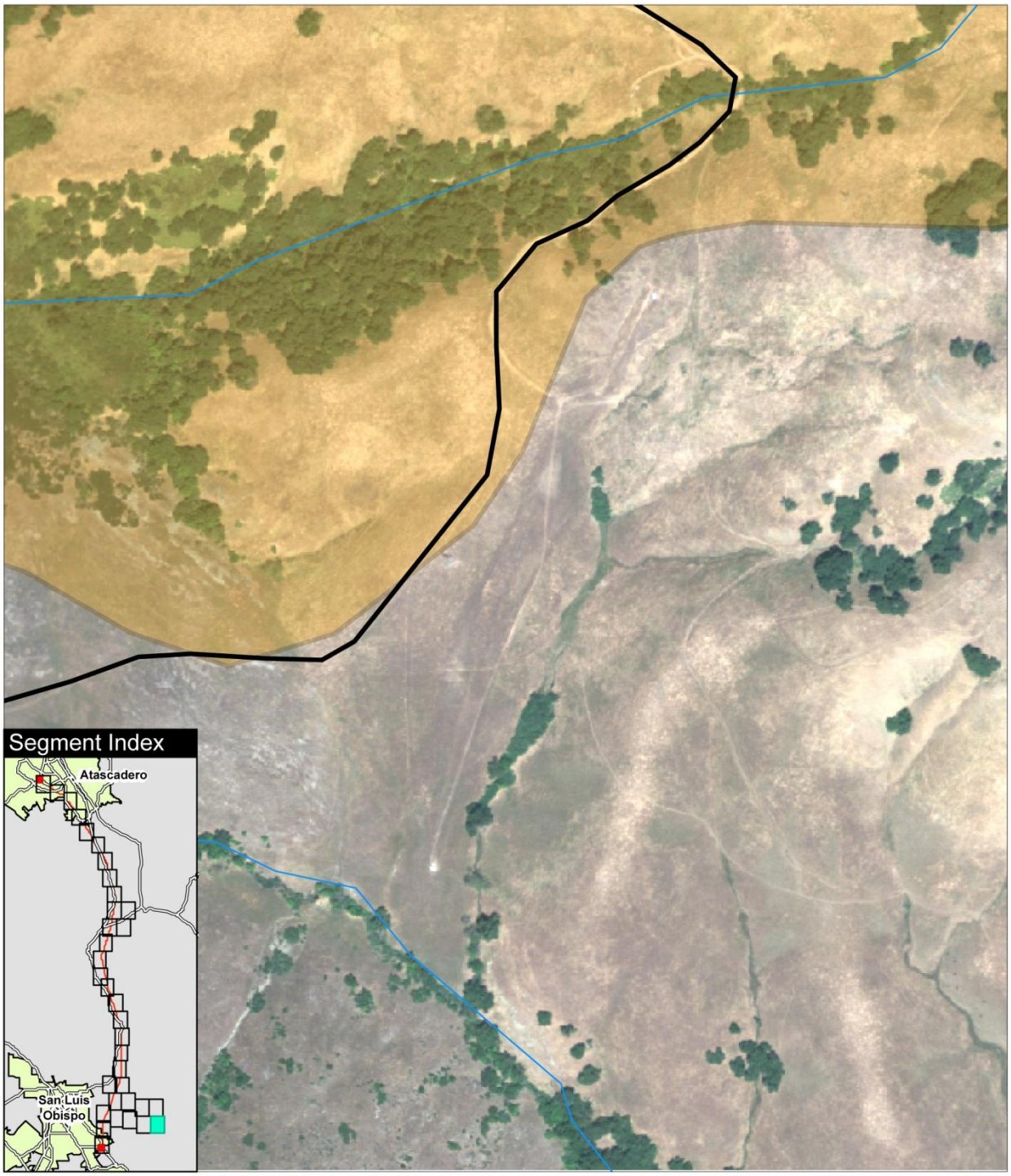
Figure A-32: Power Line Segment (32 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

N
W
E
S

* Refer to Figure 2.4-0 for legend explanation

Feet
0 125 250 500 750 1,000

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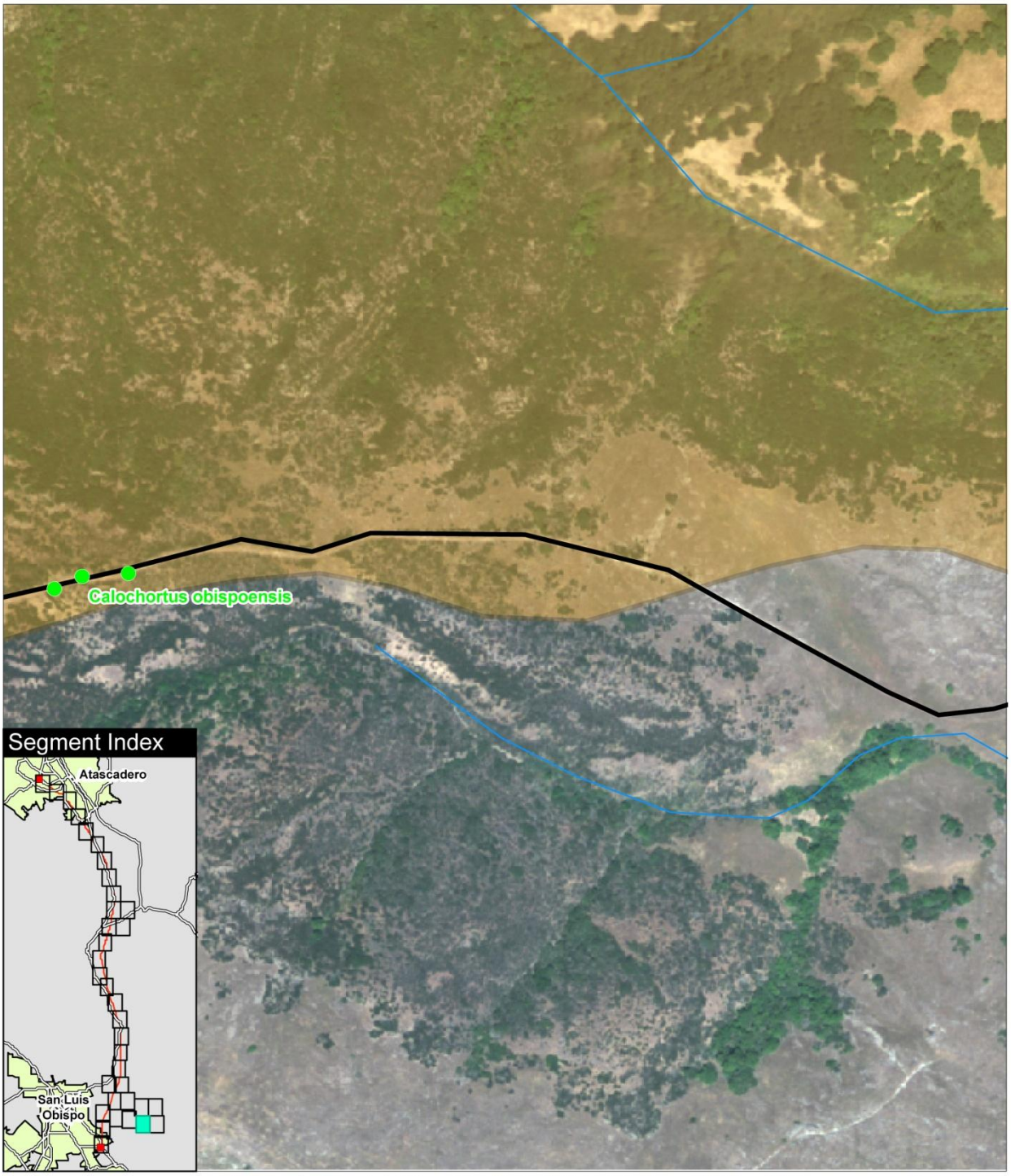
FigureA-33: Power Line Segment (33 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

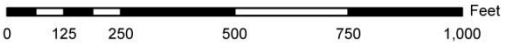


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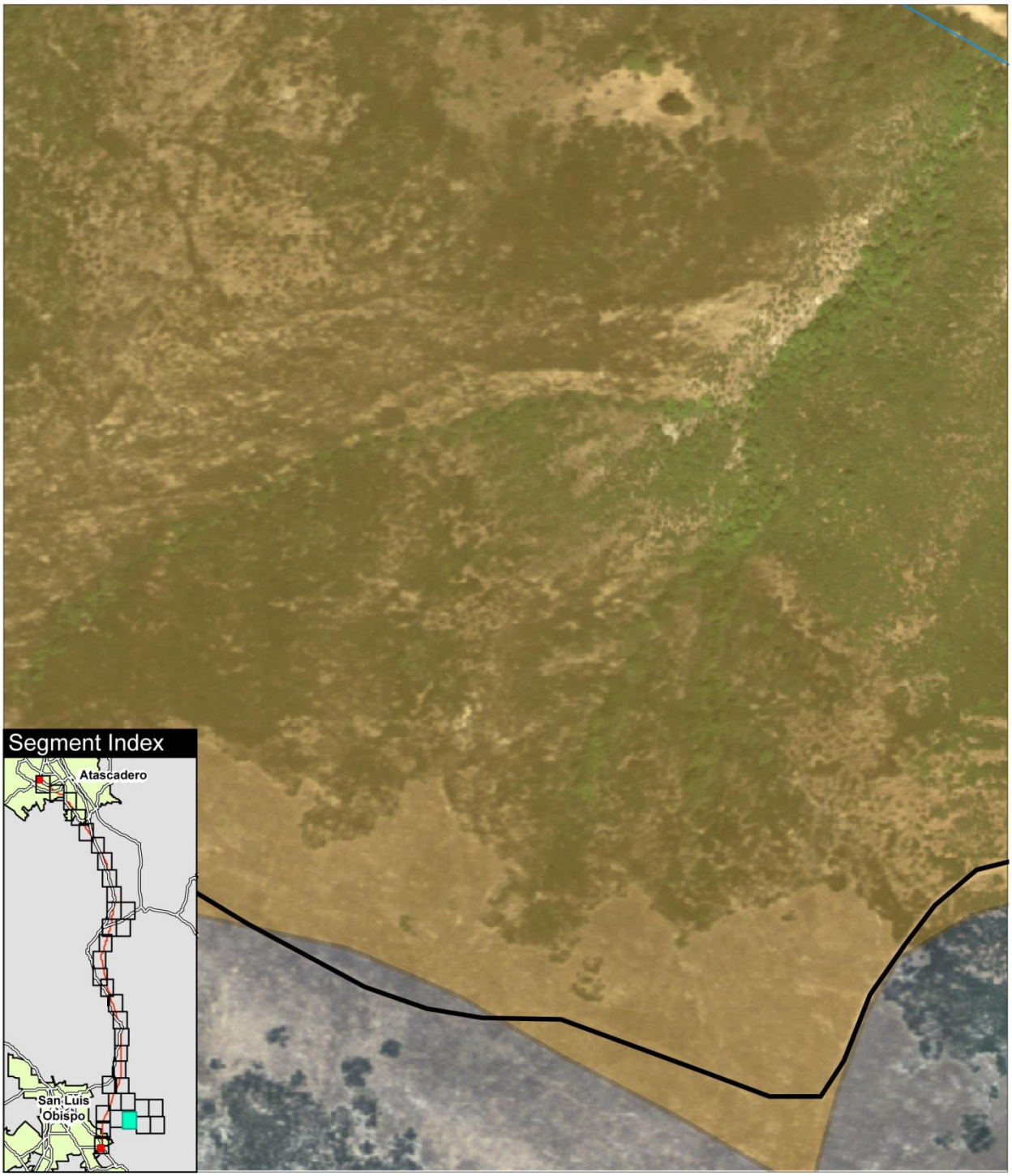
Figure A-34: Power Line Segment (34 of 35)



SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation

N W E S

0 125 250 500 750 1,000 Feet

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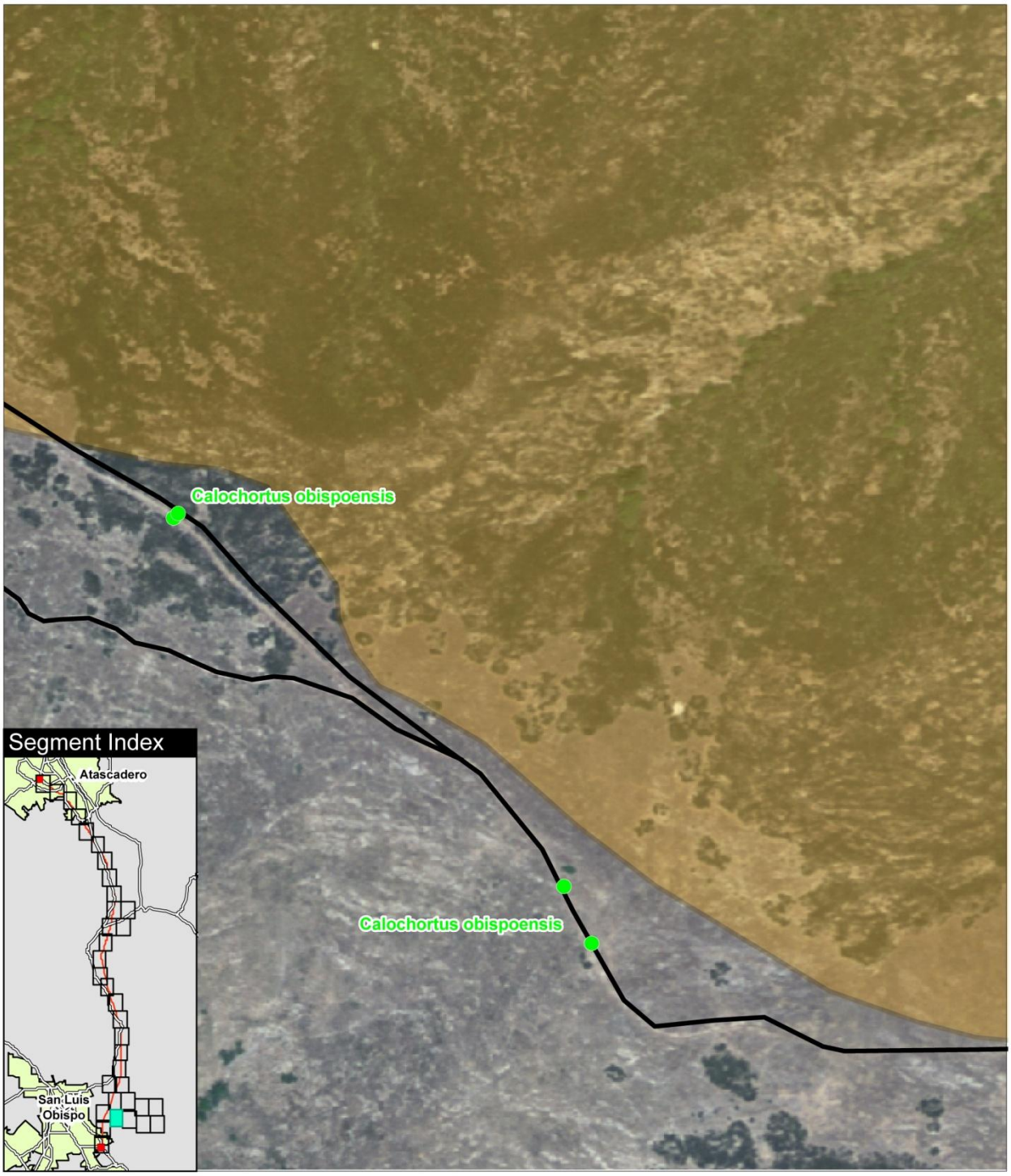
Figure A-35: Power Line Segment (35 of 35)

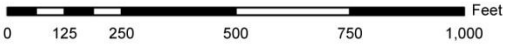


SOURCE: PG&E 2010, Ventyx 2010, County of San Luis Obispo 2010, USGS 2010, ESRI 2006, and RMT Inc. 2010

Scale 1:5,000

LEGEND

* Refer to Figure 2.4-0 for legend explanation



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Appendix B:
Project Contact List

Table B-1: Project Contact List

Name	Agency/ Company	Job Title/Duties	Phone Number/Fax Number	Email Address
Lisa Orsaba	CPUC	CPUC Project Manager	(415) 703-1966 (office)	lob@cpuc.ca.gov
Judi Mosley	PG&E	Attorney	(415) 973-1455	jkm8@pge.com
John Wathen	PG&E	Project Manager	805-459-9370 (office)	JBW2@PGE.com
Robyn Salvadori	PG&E	Environmental Manager	(415)973-5698 (office) (415)314-1500 (cell)	R8SN@pge.com
Jeff Glenn	PG&E	Construction Manager (Pole Segment)	(805) 459-4970	jtg6@pge.com
Dale Brock	PG&E	Construction Manager (Steel Tower Segment)	(530) 682-7024	gdb5@pge.com
Aaron Henson	PG&E	Construction Foreman (Steel Tower Segment)	(530) 682-7498	AxHr@pge.com
Robert (Bobby) Rael	PG&E	Construction Foreman (Pole Segment)	(805) 459-7148	RERb@pge.com
Mark Cassady	TRC	Environmental Compliance Supervisor	(805) 528-7099 (office) (805) 550-4652 (cell)	mcassady@trcsolutions.com
Brooke Langle	Terra Verde	Environmental Inspection Manager	(805) 896-5479	blangle@terraverdeweb.com
Jessica Adinolfi	Terra Verde	Environmental Inspector	(714) 478-8765	jadinolfi@terraverdeweb.com
Kyle Giacomini	Terra Verde	Environmental Inspector	(925) 998-9669	kgiacomini@terraverdeweb.com
Pete Giles	Terra Verde	Environmental Inspector	(209) 609-7728	pgiles@terraverdeweb.com

Table B-1 *(Continued)*: Project Contact List

Name	Agency/ Company	Job Title/Duties	Phone Number/Fax Number	Email Address
Rob Witthaus	GANDA	Biology Lead	(408) 779-6529 (office) (408) 621-8531 (cell)	rwitthaus@garciaandassociates.com
Barry Price	Applied Earthworks	Cultural and Paleontological Lead	(805) 594-1590 (office) (559) 284-0449 (cell)	bprice@appliedearthworks.com
Tina Lau	ETIC	Stormwater Lead	925-602-4710 x42	tlau@eticeng.com
Tania Treis	RMT	CPUC Monitoring PM	(650) 373-1200 (office) (650) 373-1211(fax)	Tania.Treis@rmtinc.com
Andrew Martin	RMT	CPUC Monitoring Analyst	(650) 373-1200 (office) (650) 373-1211(fax)	Andrew.Martin@rmtinc.com
Aaron Lui	RMT	CPUC EM	(650) 373-1200 (office) (650) 373-1211(fax)	Aaron.Lui@rmtinc.com

Appendix C:
Communication Protocol Summary

Communication Protocol Summary

Section 2.4 of the MMCRP includes a communication protocol to ensure that CPUC Environmental Monitors (CPUC EMs) have access to project information, including schedules, mitigation measure implementation status, and survey results. The communication protocol establishes a chain of command that will be used to report environmental issues observed during CPUC EM site inspections. The following table summarizes the communication protocol.

For additional information, refer to Sections 2 and 3 of the MMCRP.

Table C-1: Team Roles and Responsibilities

Role	Name	Responsibility
CPUC		
CPUC Project Manager	Lisa Orsaba	▪ Project oversight ▪ Must be notified in the case of non-compliance issues ▪ May stop project work ▪ Reviews bi-weekly compliance reports ▪ Schedules meetings to address compliance issues, monitoring issues, and disputes ▪ Follow up on non-compliance issues ▪ Approves variance requests, NTPs, and other approval letters as needed to PG&E Environmental Manager and Compliance Supervisor ▪ Directs questions/issues to CPUC legal department as needed
CPUC Environmental Consultants - RMT		
CPUC Monitoring PM	Tania Treis	▪ Schedules RMT monitoring team ▪ Reviews PG&E Weekly reports and RMT's bi-weekly reports to the CPUC and submits reports to the CPUC PM ▪ Reviews variance approvals and submits to the CPUC PM ▪ Communicates project issues and progress with the CPUC project manager ▪ Reviews EM incident and compliance documentation and addresses any compliance issues with the PG&E Monitoring Manager and Compliance Supervisor ▪ Participates in calls with agencies, as needed ▪ Issues incident reports and submits to CPUC PM and PG&E Compliance Supervisor – follows up on incident reports ▪ Issues non-compliance memorandums and submits to CPUC PM, PG&E Compliance Supervisor, and Environmental Manager within 24 hours of non-compliance event

Table C-1 *(Continued)*: Team Roles and Responsibilities

Role	Name	Responsibility
CPUC Monitoring Analyst	Andrew Martin	▪ Reviews and processes variance requests
CPUC EM	Aaron Lui	▪ Performs field monitoring and verification of mitigation compliance ▪ Reviews weekly reports prepared by PG&E EIs ▪ Prepares bi-weekly reports for CPUC ▪ Reports mitigation issues to PG&E EI for in-field correction ▪ Can stop work via contact with PG&Es EI if resources are at risk. ▪ Document incidents and non-compliances during field monitoring and in reports ▪ Determines, based on field review and familiarity with the location and resource, that some proposed changes are minor in scope and do not require requests for variance; documents such decisions in e-mails sent to PG&E Compliance Supervisor, CPUC Monitory PM, and CPUC PM. ▪ Provides RMT Monitoring Manager with language for incident reports
CPUC Environmental Consultant – BioResource Consultants		
CPUC Specialty Monitors	Chuck Schade Patrick Martin	▪ Reviews pre-construction surveys ▪ Reviews schedules and ensures that pre-construction surveys are adequate and performed within the appropriate timeframe based on permit conditions and mitigation measures ▪ Reports any agreed upon changes to buffers or other biological mitigation measures to CPUC PM ▪ Coordinates with PG&E Lead EI for buffer reduction and other biological issues.
PG&E		
PG&E Env Manager	Robyn Salvadori	▪ Addresses issues regarding mitigation implementation or inconsistencies ▪ Contacts agencies as appropriate ▪ Coordinates overall efforts with CPUC PM and Monitoring Manager ▪ Address non-compliance issues ▪ Directs questions/ issues to to PG&E legal department as needed

Table C-1 *(Continued)*: Team Roles and Responsibilities

Role	Name	Responsibility
PG&E Legal	Judi Mosley	▪ Participates in meetings regarding compliance issues, monitoring issues and disputes ▪ General oversight
PG&E Construction Managers	Foreman Jeff Glenn Dale Brock	▪ Notifies EIs of project schedules and changes ▪ Works with EIs on any compliance issues that arise ▪ Coordinates with EIs and Specialty Monitors on need for pre-construction surveys
PG&E Environmental Consultant – TRC		
PG&E Env Compliance Supervisor	Mark Cassady	▪ Prepares weekly compliance reports ▪ Lists any measures that cannot be implemented and provides list to CPUC Monitoring PM ▪ Prepares variances ▪ QA/QC of mitigation measures and their implementation ▪ Notifies RMT of upcoming work schedule ▪ Provides a report of any incident prepared by EI to CPUC Monitoring PM within 24 hours of the incident or by close of business the next business day if the incident occurs on Friday. Report shall include details of incident, corrective actions taken and follow up actions to be taken indicating likely time-frame for resolution of incident.
PG&E Environmental Consultant – Terra Verde		
PG&E EIs	Brooke Langle (lead) Jessica Adinolfi Kyle Giacomini	▪ At least one full time monitor in field at all times ▪ Ensures compliance with MMs and permits ▪ Coordinates biological and cultural pre-construction survey and monitoring work ▪ Contacts PG&E Compliance Supervisor if measures not being implemented properly ▪ Coordinates with RMT EM ▪ Prepares incident reports and submits to PG&E Compliance Supervisor ▪ Issues non-compliance reports and resolution reports and submits to PG&E Environmental Manager and PG&E Compliance Supervisor
PG&E Environmental Consultant – Garcia and Associates		
PG&E Specialty Monitor	Rob Witthaus	▪ Performs pre-construction surveys ▪ Monitors resources in compliance with permit conditions and mitigation measures

Table C-1 *(Continued)*: Team Roles and Responsibilities

Role	Name	Responsibility
		▪ Provides documentation of surveys and monitoring to PG&E Compliance Supervisor ▪ With PG&E EI coordinates with RMT EMs from BRC for any reduction in buffer zones or other biological or cultural resource finds during pre-construction surveys
PG&E Environmental Consultant – Applied Earthworks		
PG&E Specialty Monitor	Barry Price	▪ Performs pre-construction surveys ▪ Monitors resources in compliance with permit conditions and mitigation measures ▪ Provides documentation of surveys and monitoring to PG&E Compliance Supervisor ▪ With PG&E EI coordinates any cultural resource finds during pre-construction surveys
PG&E Environmental Consultant – ETIC		
PG&E Specialty Monitor	Tina Lau	▪ Installs and maintains BMPs in accordance with the project SWPPP ▪ Provides documentation of installed BMPs and field monitoring activities to PG&E Compliance Supervisor ▪ Amends the SWPPP as necessary to reflect any changes to the Permits or changes to construction or operational activities that may affect discharges from the construction site

Table C-2: Communication Protocol

Action Item	Protocol
Field Visits and Meetings	
Tailboard Meetings	PG&E Construction Manager or Foreman leads field meetings attended by CPUC EM, PG&E EIs, PG&E Specialty Monitors, construction crew, as appropriate
Field Meetings	Field Meeting requested by any party → Request is directed to PG&E Environmental Manager or PG&E EIs → Contacts appropriate personnel who arranges field meetings.
CPUC Monitoring Visits	CPUC EM visits once per week → Main contact in the field is PG&E lead EI (Jessica Adinolfi) The CPUC EMs may communicate with crew members on the ROW, but will not direct their work or rely on them for information regarding the project.

Table C-2 *(Continued)*: Communication Protocol

Action Item	Protocol
Reporting and Project Information	
PG&E Weekly Reports	Prepared by PG&E Compliance Supervisor with appropriate input from PG&E EI's and PG&E specialty monitors → Final reports emailed to CPUC Monitoring PM, CPUC EM, CPUC PM, PG&E PM
CPUC Bi-Weekly Reports	Prepared by CPUC EM→ Reviewed by CPUC Monitoring PM → Sent to CPUC PM
Survey Area Maps	PG&E EIs prepare survey maps →Distribute all updates to CPUC Monitoring PM; CPUC EMs (including biologist); PG&E Specialty Monitors
Project Changes	
Schedule Changes	PG&E Environmental Manager → notifies CPUC Monitoring PM and CPUC EM of changes to the schedule via email or by phone
Variance Requests	PG&E Compliance Supervisor prepares a variance request → the request is sent to the CPUC Monitoring PM and CPUC Monitoring Analyst who reviews and, if acceptable, prepares a draft approval letter and sends to the CPUC PM → CPUC PM sends approval to PG&E Compliance Supervisor Refer to Section 3.2.1 of the MMCRP.
Mitigation Measure Changes	PG&E Compliance Supervisor identifies measures that cannot be implemented and provides to CPUC Monitoring PM in writing or email → CPUC Monitoring PM reviews, consults with CPUC PM, and provides input on alternatives, etc. to the PG&E Compliance Supervisor
Buffer Reductions Regarding Biological Issues	PG&E lead EI documents justification for reduction in buffer based on species, topography, etc., → contacts CPUC EM biologist (Chuck Schade) who reviews and determines if a site visit is required and determines if reduction in buffer zone is justified→ CPUC EM biologist provides an email to PG&E EIs, PG&E Compliance Supervisor, CPUC Monitoring PM, and CPUC EM with decision
Compliance Issues	
PG&E Incident and Non-Compliance Reports	Prepared by PG&E EI → Sent to PG&E Compliance Supervisor for review → Forwarded to CPUC Monitoring PM and EM within 24 hours → Forwarded to CPUC PM for compliance issues → Follow-up performed by CPUC EM within one week or agreed upon timeframe Section 3.2.5 of the MMCRP.
Occurrences	The CPUC EMs will contact PG&E EIs to discuss general issues, occurrences, and questions that arise during site visits
CPUC Incident Report	Form prepared by CPUC EM → Sent to CPUC Monitoring PM for review → Forwarded to CPUC PM, PG&E Environmental Manager, and PG&E Compliance Supervisor within 24 hours (or close of next business day) of observance of Incident → Follow-up performed by CPUC EM within one week of incident

Table C-2 *(Continued)*: Communication Protocol	
Action Item	**Protocol**
CPUC Non-Compliance Report	Form prepared by CPUC EM → Sent to CPUC Monitoring PM for review → Forwarded to CPUC PM, PG&E Environmental Manager, and PG&E Compliance Supervisor within 24 hours (or close of next business day) of observance of Non-Compliance → CPUC EM to follow up on any corrective actions with PG&E Compliance Supervisor within one week of non-compliance
Agency Jurisdiction Issues	Issue is identified in the field → PG&E Environmental Manager or CPUC Monitoring PM (with notice to PG&E Environmental Manager and PG&E Compliance Supervisor) contacts agency → PG&E Environmental Manager informs CPUC Monitoring PM and CPUC PM re: resolution of issue
Stop Work and Restart Work Issues	
Stop Work	CPUC EM identifies issue → Contacts PG&E EI for discussion → PG&E EI may decide to stop work If not → CPUC EM Contacts CPUC Monitoring PM to discuss issue → CPUC Monitoring PM contacts PG&E Environmental Manager to discuss stop work → PG&E Environmental Manager contacts lead PG&E EI in the field to stop work Within 24 hours of stop work order (or the close of next business day) CPUC Monitoring PM issues a written explanation of stop work, the location and parameters of the stop work, and the corrective actions and procedures required to restart work→ sends to PG&E Environmental Manager; PG&E Compliance Supervisor; PG&E EIs, CPUC PM, CPUC Monitoring PM, and CPUC EMs
Restart Work	PG&E Environmental Manager issues written notification of a request to restart work including the remedial actions completed → sends to CPUC Monitoring PM, CPUC EMs, and CPUC PM → CPUC PM or CPUC Monitoring PM issues verbal approval to resume work and provides written approval to PG&E Environmental Manager within 24 hours of verbal approval

Appendix D:
Incident Report Form

Incident Report Form

Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project

Date of Incident:_____

Personnel/Contractor/Monitor/Other Personnel Present:_____

_____

_____

Location:_____

Specify Requirement (e.g., Mitigation Measure Biology-5): _____

Detailed Description of Incident: Photos? Yes ☐ No ☐

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Resolution: Include names and phone numbers and times of conversations – Remember to follow the Communication Protocol at all time.

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Prepared by: _____ **Date Prepared:** _____

*Please send Incident Report with Weekly Report

Appendix E:
Variance Request Form

Variance Request No.:_____

Environmental Variance Request Form

Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project

Date:_____ Date by which Approval is Required:_____

Location:_____Current Land Use:_____

Ownership: Private_____ County Road:_____ Other:_____

Drawing/Plan No.:_____ Drawing/Sketch Attached? Yes_____ No___

Variance Summary Description:_____

Describe variance in detail:_____
_____
_____
_____
_____

Reason for the variance:_____
_____
_____
_____

---------- **This part to be completed by Environmental Monitor**----------

Botanical Survey Required? Yes_____ No_____
If yes, results of survey:_____ Survey Date:_____
If no, explain why survey not needed:
Survey report attached? Yes_____No_____ Submitted separately by (date)_____

Wildlife Survey Required? Yes_____ No_____
If yes, results of survey:_____ Survey Date:_____
If no, explain why survey not needed:_____
Survey report attached? Yes_____ No_____ Submitted separately by (date)_____

Cultural or Paleontology Resource Survey Required? Yes_____ No_____
If yes, results of survey:_____ Survey Date:_____
If no, explain why survey not needed:
Survey report attached? Yes_____ No_____ Submitted separately by (date)_____

Appendix F:
Temporary Extra Work Space Form

Extra Workspace Request No.:_____

Environmental Extra Workspace Request Form
Atascadero - San Luis Obispo 70kV Power Line Reconductoring Project

Date:_____ Requested Date of Approval:_____Prepared by:_____

Location/Address:_____

Proposed Use of Site:_____

Proposed Date(s) of Use_____Proposed Hours of Use:_____
Note: Proposed Dates of Use must be less than 60 days or a Variance Request will be required.

Adjacent Land Uses:_____

Biological, cultural and paleontological reconnaissance surveys are mandatory for use of any areas containing vegetation, or exposed earth that have not been previously surveyed and fully described in project documents. Biological surveys are mandatory for all temporary extra work sites. Attach a diagram of the proposed area that identifies the location of the site and proximity to sensitive resources or receptors.

Complete the Environmental Checklist below.

*Note: **Yes** answers require additional clarification and should be submitted as an attachment to this form.*

Environmental Checklist	Yes	No	CPUC Verified
Air Quality: Would equipment be on site or idled for more than 10 minutes? Would there be dust-producing activities?			
Biological Resources: Would use of the site result in potential impacts to sensitive biological resources? Would use of the site result in potential for the spread of noxious weeds?			
Cultural/Paleontological Resources: Would clearing or grading be required?			
Water Resources: Would runoff from the site flow into storm drains or a waterway? Would equipment refueling or maintenance be performed? Would materials block/impact storm drains or gutters?			
Land Use and Recreation: Would use of site block access to local land uses and recreational areas?			
Noise: Are noise-sensitive receptors (e.g., homes, schools, hospitals, churches convalescent homes, parks, recreational areas) adjacent to the site?			
Socioeconomics: Would access to business be blocked? Would there be disruption of business operations?			

Environmental Checklist	Yes	No	CPUC Verified
Traffic: Would parking be eliminated? Would increased construction traffic result in impacts? Is the site a residential area?			
Visual: Would lights at site create glare for adjacent land uses (including roadways)?			

Standard Conditions of Approval

- The CPUC, via its designated Environmental Monitor, will review and approve/deny the Temporary Extra Workspace Request (TEWS) request within four business days of receiving this completed form.
- Use of TEWS is limited to 60 days. First proposed date of use: _____
- Use of TEWS shall be in compliance with local ordinances (including traffic/noise) and mitigation measures.
- If any signs of cultural resources are identified, work shall cease immediately and the site shall be reevaluated.
- The proposed site shall not be used for storage of fuel or hazardous materials.
- All drips, leaks, and/or spills from vehicles and/or equipment shall be cleaned-up immediately and disposed of in appropriate, labeled containers.
- Adjacent streets shall be swept or cleaned with water at the end of each workday if visible soil material is carried on them.
- No parking or storage of vehicles (including personnel vehicles), equipment, pipe, or any other project- related item shall be allowed on adjacent roadways.
- If a complaint is received, it shall be forwarded to the PG&E Permit Coordinator, the CPUC EM, and the CPUC Monitoring PM for review.

The following signatures indicate that the proposed site is approved for TEWS. On a random basis, a CPUC EM will verify that use of the proposed site is in accordance with the conditions noted. This approval may be revoked at any time by any one of the approval team. Failure to comply with all conditions will result in immediate revocation of this TEWS approval.

PG&E Construction: _____ Date:_____

PG&E Permit Coordinator: _____ Date:_____

The above TEWS request and attached documentation have been reviewed and this request is approved or denied (*circle one*).

CPUC Monitoring Project Manager: _____

Additional CPUC Conditions of Approval

_____

_____

_____

(CPUC EM Initial _____)

Reason(s) for Denial

_____

_____

_____

Appendix G:
Mitigation Monitoring Program Table

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
Aesthetics				
D	**APM AE-2. Tree Replacement.** In the City of Atascadero, PG&E shall comply with all local Tree Ordinances and obtain any necessary ministerial permits for the removal of native and non-native trees. In the City of San Luis Obispo some trees will be removed in back or side yards to provide sufficient working space for construction equipment, and safe electrical clearances for the new TSPs and conductor. Property owners have been consulted and written permission will be obtained from these property owners prior to removal of any trees.	Verify any necessary ministerial tree permits have been obtained and appropriate property owners notified.	Prior to tree removal	
D	**Mitigation Measure AQ-1 (proposed to supersede APM AQ-1 "Fugitive Dust Minimization").** […]A Fugitive Dust Control Plan shall be developed at least 30 days prior to project construction. The plan shall be submitted to SLOCAPCD for approval. Copies of the finalized dust control measures shall be submitted to CPUC with documentation of approval from SLOCAPCD. Elements of the Fugitive Dust Control Plan shall include, but not be limited to, measures such as the following: 1. The amount of disturbed area shall be reduced wherever possible. 2. Water trucks or sprinkler systems shall be used to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 miles per hour (mph). Reclaimed (non-potable) water shall be used whenever possible. Non-potable water shall not be used in or around crops used for human consumption. 3. Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible following completion of any soil-disturbing activities. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved by SLOCAPCD. 4. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface. 5. Wheel washers (or equivalent) shall be installed at all access points, or if appropriate, at designated landing zones and laydown areas, to prevent tracking of mud onto public roads. Other specific measures to prevent mud tracking shall be provided in the SWPPP. 6. Streets shall be swept at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible. 7. If county grading and building ministerial permits are required, all of these fugitive dust measures shall be shown on grading and building plans. 8. A person or persons shall be designated to monitor fugitive dust emissions and enhance implementation of the measures, as necessary, to minimize dust complaints, reduce visible emissions below 20 percent opacity, and prevent transport of dust off site. The name and telephone number of such person(s) shall be provided to the SLOCAPCD Compliance Division prior to the start of any grading, earthwork, or demolition.	Verify that the Fugitive Dust Control Plan includes the required measures and is approved.	30 days prior to construction	
Biological Resources				
D	**Mitigation Measure BO-1 (proposed to supersede APM BO-1 "Avoidance of and Minimization of Potential Impacts to Birds").**[…] Monitoring guidelines shall be provided in an Avian Protection Plan to be submitted to USFWS and CDFG for review and approval prior to construction. Documentation of plan approval shall be submitted to the CPUC for record-keeping. […]	Verify approval of Avian Protection Plan by USFWS.	Prior to construction	
D	**Mitigation Measure BO-4 (proposed to supersede APM BO-4 "Pre-construction Surveys and Relocation of Species").** Pre-construction surveys shall be conducted by a USFWS-approved biologist no more than two weeks prior to initiating any ground-disturbing activities to occur within 300 feet of	Verify the completion of surveys.	No more than 2 weeks prior to construction	

[1] Verify through documentation (D) or field observation (F).

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
	suitable CRLF habitat. All suitable aquatic and upland habitat, including refugia habitat such as under shrubs, downed logs, small woody debris, and burrows, shall be thoroughly inspected. […]		within 300 feet of suitable CRLF habitat	
D	**Mitigation Measure BO-5 (proposed to supersede APM BO-5 "Development and Implementation of a Worker Environmental Awareness Program" and APM BO-16 "Specialized CRLF Training").** A USFWS-approved biologist shall design and lead an Environmental Training and Monitoring Program (ETMP) for all construction and on-site personnel prior to beginning construction activities. Training shall include a discussion of avoidance and minimization measures to be implemented to protect biological resources, as well as the terms and conditions of the Biological Opinion and other permits. Training shall include information on the federal and state ESAs, the MBTA, and the Bald and Golden Eagle Protection Act, and the consequences of noncompliance with these acts. Workers shall be informed of the presence, life history, and habitat requirements of all special-status species, including the CRLF, with a potential to be affected within the project area. The training shall include a description of the CRLF and its habitat and the importance of the CRLF and its habitat, along with the general measures that are being implemented to conserve the CRLF, as they relate to the project. Training shall include information on state and federal laws protecting nesting birds, wetlands, and other water resources. An educational brochure shall be produced for construction crews working on the project. The brochure shall include color photos of sensitive species as well as a discussion of mitigation measures. No construction worker shall be involved in field operations without having participated in this special-status species/sensitive habitat informational training. A copy of the ETMP shall be submitted to the CPUC at least 30 days prior to construction. Training attendance sheet(s) shall be submitted to the CPUC after each training session.	Verify content of training material.	30 days prior to construction	
D	**APM BO-7. Storm Water Permit.** PG&E will obtain coverage under the Construction Storm Water Permit Program […]. These BMPs may include, but are not limited to, silt fencing, temporary berms, restrictions on cleaning, installation of vegetative strips, and temporary sediment disposal.	Verify that the SWPPP is prepared and appropriate BMPs are included.	Prior to construction	
D	**APM BO-8. Avoidance of Environmentally Sensitive Resource Areas.** Sensitive resources identified during pre-construction surveys in the project vicinity will be mapped and clearly marked in the field. Such areas will be avoided during construction to the extent practicable and/or additional measures specific to sensitive species types as described herein and that may be required by the USACE, FWS, CDFG, and RWQCB permits, will be implemented to avoid or minimize impacts.	Verify field marking of sensitive resource areas.	Prior to construction within the vicinity of sensitive resource areas	
D/F	**Mitigation Measure BO-14 (proposed to supersede APM BO-14 "Avoidance of CRLF Habitat").** PG&E shall install exclusion fencing around aquatic habitat in areas where construction activities are within the vicinity of aquatic habitat (the upland habitat buffer). Prior to commencing construction activities, flagging, signage, and/or high visibility fencing shall be erected around the CRLF habitat to identify and protect it from the encroachment of personnel and equipment. These areas shall be avoided by all construction personnel. […]	Verify that exclusion field markings are in place.	Prior to construction within the vicinity of aquatic habitat	
D/F	**APM BO-15. Fencing of Staging Areas within Proposed Critical Habitat Boundaries.** PG&E will install exclusion fencing around staging areas that will be used during the typical CRLF avoidance window, from April 1 through November 1, within the proposed critical habitat boundaries. Prior to the commencement of construction activities, exclusion fencing will be erected around the staging areas to preclude entry by CRLF. Fencing will be keyed at least 6 inches into the ground. The fencing will be inspected and maintained during the avoidance window until completion of the project. Only when the construction of the project, in a specified area, is completed, will the fencing be removed.	Verify that exclusion fencing is installed and maintained around the staging areas.	April 1 through November 1 within critical habitat boundaries	
D	**APM BO-17. Qualified Biologist CRLF Inspection.** PG&E will obtain Section 7 of the Federal Endangered Species Act coverage under the Programmatic Biological Opinion for CRLF. The name(s) and credentials of biologists who will conduct activities specified in the following measures will be submitted at least 15 days prior to the onset of activities at specific locations. Project activities will not begin until PG&E has received written approval from the USFWS that the biologist(s) is qualified to conduct the work. A USFWS-approved biologist will survey the work site, locations that include the primary constituent elements of suitable habitat, a minimum of two weeks before the onset of activities. If CRLF, tadpoles, or eggs are found, the approved biologist will contact the USFWS to determine if moving any of these life-stages is appropriate. In making this determination, the USFWS will consider if an appropriate relocation site exists. If the USFWS approves moving animals, the approved biologist will be allowed sufficient time to move CRLF from the work site before work activities begin. Only USFWS-approved biologists will participate in activities associated with the capture, handling, and monitoring of CRLF. The USFWS-approved biologist will be present at the work site until such time as all removal of CRLF, instruction of workers, and habitat disturbance has been completed. For the purpose of this measure, habitat disturbance refers to clearing or grading in areas of dense vegetation within 100 feet of aquatic habitat, as well as culvert placement or fill activities in drainages within the proposed critical	Verify USFWS approval of biologist. Verify completion of preconstruction surveys.	2 weeks prior to construction	

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
	habitat boundaries.			
D	**Mitigation Measure BO-21 (proposed to supersede APM BO-21 "Refueling and Equipment Maintenance Methods that Protect CRLF").**[…]Prior to the onset of work, the USACE shall ensure that the permittee has prepared a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.	Verify that the spill response plans is prepared and appropriate measures are included.	Prior to construction	
D	**Mitigation Measure BO-24 (proposed to supersede APM BO-24 "Avoidance of and Minimization of Potential Impacts to Burrowing Owls").** Pre-construction surveys shall be conducted by a qualified biologist for burrowing owls for all project work areas that provide suitable nesting or wintering habitat (annual grasslands and pastures). Although burrowing owls are not likely to nest in the project area, the potential for nesting owls cannot be precluded. The work area surveys shall be conducted within the ROW, covering the work area and surrounding areas visible from the ROW. The survey shall include checking for the burrowing owl and owl signs (e.g., white wash at burrow entrances). If ground-disturbing activities in suitable habitat are delayed or suspended for more than 30 days after the pre-construction surveys, the site shall be resurveyed. If no burrowing owls are detected, no further mitigation shall be necessary. If active burrows are found near a work area, work in the vicinity of the burrows shall be limited as follows: a. No disturbance shall occur within approximately 160 feet (50 meters) of occupied burrows during the non-breeding season of September 1 through January 31, or within approximately 250 feet (75 meters) during the breeding season of February 1 through August 31. b. Limits of the exclusion zone in the project work area shall be clearly marked with signs, flagging, and/or fencing. If work within these limits is unavoidable while burrows are active, work shall only be conducted in the presence of a qualified monitor who shall determine if the owls show signs of disturbance. Alternatively, upon prior approval from the CDFG, a passive relocation effort (displacing the owls from the work area) may be conducted as described below, and subject to approval from the CDFG. Passive relocation of owls may occur during the non-breeding season (September 1 through January 31) with prior approval from the CDFG. Passive relocation shall include installing one-way doors on the entrances of burrows. The one-way doors shall be left in place for 48 hours to ensure the owls have vacated the nest site. Owls shall not be relocated during the breeding season. All pole and tower leg holes shall be backfilled or covered at the end of the work day to prevent entrapment of burrowing owls. The open ends of LDS poles, in suitable habitat, shall be covered during storage to prevent burrowing owls from inhabiting the pole openings.	Verify completion of burrowing owl preconstruction surveys.	No more than 30 days prior to construction	
D	**Mitigation Measure BO-25/26 (proposed to supersede APMs BO-25 "Biological Surveys Prior to Bat Breeding Season" and BO-26 "Bat Avoidance Measures").** Before the spring breeding season (and prior to start of construction), a qualified biologist shall perform a survey for roosting bats or maternity colonies at the proposed project site. Surveys shall evaluate the probability for trees to host roosting bats. For trees considered to have a high probability for bats, acoustic monitoring shall be performed in early summer to detect if there are any roosting sites in the trees. If avoidance of an active roosting bat or maternity colony is not practicable, a sufficient buffer shall be established in consultation with the CDFG. If acoustic monitoring detects that bats are using trees that need to be cut down, exclusionary one-way doors shall be installed in late August, after completion of the maternity season. Roost trees shall be removed after it has been confirmed that roosting bats have departed. If a roost is lost, PG&E shall consult with the CDFG to see if the agency recommends bat boxes be installed in the vicinity of the cut tree.	Verify completion of roosting bat preconstruction surveys.	Prior to construction and prior to spring breeding season	
D	**Mitigation Measure BO-28 (proposed to supersede APM BO-28 "Implementation of Revegetation and Monitoring Plan" and APM AE-4 "Revegetation and Regrading").** PG&E shall prepare a Revegetation and Monitoring Plan prior to construction. A copy of the plan shall be submitted to the CPUC prior to construction. The plan shall include, but not be limited to, the following provisions: a. All old conductors shall be removed from the project site. b. Disturbed areas(ground disturbance for pole placements, tower footings, and minor grading for small concrete staging areas located approximately 80 feet uphill from towers), other than existing access roads, shall be stabilized and revegetated with appropriate (i.e., conducive with PG&E line clearance requirements) native species. c. If applicable, the site shall be monitored following construction for an appropriate period of time to ensure the successful re-	Verify that the appropriate measures are incorporated into the Revegetation and Monitoring Plan and that the plan is completed.	Prior to construction	

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
	establishment of native species, to prevent establishment of weeds, and to ensure the successful reestablishment of native species. d. Stream contours shall be returned to their original condition once coffer dams are removed, unless consultation with the USFWS has determined that it is not beneficial to the species or is not feasible. e. Permanent dust control measures shall be implemented through revegetation and landscaping as soon as any ground-disturbing activities are completed. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast-germinating, non-invasive grass seed, or otherwise covered with mulch or plastic. f. All disturbed soil areas not subject to revegetation shall be stabilized using best management practices. g. Disturbed serpentine grassland areas shall be restored, as determined by the project biologist, and may be reseeded with local genotypes of native serpentine grassland species.			
D	**Mitigation Measure BO-29 (proposed to supersede APM BO-29 "Avoidance of and Minimization of Potential Impacts to Special-Status Plants").** The following measures shall be implemented: a. […] b. Prior to construction, any special-status plant species that are known to occur on the project site shall be enumerated, photographed, and conspicuously flagged for avoidance. If timing of field surveys and flagging must occur outside of the appropriate blooming period, the data map and global positioning system (GPS) locations collected during focused botanical surveys can be used to meet this condition.[…]	Verify that special status plant species are enumerated and recorded.	Prior to construction	
D	**APM BO-30. Weed Control.** […]All plant material (e.g., straw, mulch, seeds, etc.) used for erosion control and/or road maintenance will be weed-free. If weed-free straw or mulch is not available, rice straw and mulch will be used. […] Seed mixes will be approved by a biologist prior to application. Where possible, local or on site seed sources will be used. Gravel used for road maintenance will be from weed free-sources. Gravel sources will be inspected for the presence/absence of noxious weeds prior to utilization of gravel in the project area as appropriate.	Verify that plant material and gravel is weed-free, either through inspection or documentation that certifies the material as weed-free.	Prior to application	
D	**APM BO-31. Implementation of Dust Control Plan.** PG&E will prepare a Dust Control Plan prior to construction in coordination with the appropriate agencies to ensure impacts to special-status plants and associated vegetation communities are avoided or minimized.	Verify that the dust control plan is prepared and appropriate measures are included.	Prior to construction	
D	**APM BO-33. Project-specific Fire Prevention and Response Plan Development and Implementation.** PG&E will incorporate established system-wide Fire Prevention and Response procedures that will include reducing the potential for igniting combustible materials. The procedures will cover electrical hazards, flammable materials, smoking, vehicle and equipment access, and fire watches during construction and maintenance procedures during subsequent operation. Project personnel will be directed to park away from dry vegetation; not to smoke; and to equip vehicles with appropriate firefighting equipment; such as water dispensers and shovels, in times of high fire hazard. The procedures will also describe methods to reduce the potential fire hazard from operation of the power line.	Verify that the Fire Prevention and Response procedures are prepared and appropriate measures are included.	Prior to construction	
Cultural Resources				
D	**APM CR-2. Pre-construction Worker Education.** PG&E will design and implement a Worker Education Program that will be provided to all project personnel who may encounter and/or alter historical resources or unique archaeological properties, including construction supervisors and field personnel. No construction worker will be involved in field operations without having participated in the Worker Education Program. The Worker Education Program will include, at a minimum: ▪ A review of archaeology, history, prehistory and Native American cultures associated with historical resources in the project vicinity. ▪ A review of applicable local, state and federal ordinances, laws and regulations pertaining to historic preservation. ▪ A discussion of site avoidance requirements and procedures to be followed in the event that unanticipated cultural resources are	Verify that appropriate information is included in the training material. Verify that all workers are trained through review of worker training confirmation forms/statements.	Prior to construction	

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
	discovered during implementation of the project. ▪ A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and PG&E policies. ▪ A statement by the construction company or applicable employer agreeing to abide by the Worker Education Program, PG&E policies and other applicable laws and regulations. Environmental training will also be provided to workers regarding the protection of paleontological resources and procedures to be implemented in the event fossil remains are encountered by ground-disturbing activities. The Worker Education Program may be conducted in concert with other environmental or safety awareness and education programs for the project, provided that the program elements pertaining to cultural resources are provided by a qualified instructor meeting applicable professional qualifications standards.			
D	**Mitigation Measure CR-4.** Prior to construction, all project personnel shall attend environmental training regarding the protection of paleontological resources and procedures to be implemented in the event fossil remains are encountered during ground-disturbing activities. The training shall include, but shall not be limited to: 1. A review of applicable local, state and federal ordinances, laws and regulations pertaining to paleontologic preservation. 2. A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and PG&E policies. This training may be combined with other environmental training for the project, provided that the program elements pertaining to paleontological resources are provided by a qualified instructor meeting-professional qualification standards (including Society of Vertebrate Paleontology standard guidelines [1991, 1995, 2005]). Training by the qualified instructor can be recorded for subsequent sessions or can be provided by a trained designee. Attendance sheets shall be submitted to the CPUC within one week of training events.	Verify that appropriate information is included in the training material. Verify that all workers are trained through review of worker training confirmation forms/statements.	Prior to construction	
D	**Mitigation Measure CR-5.** Prior to construction, a qualified Principal Paleontologist (qualified according to SVP standards) or his/her designee shall conduct on-site inspection of high sensitivity units in areas where ground-disturbing project activities shall occur. Designation of areas of avoidance, special interest, and concern may be appropriate. […]	Verify the completion of the paleontological inspection.	Prior to construction	
Geology and Soils				
D	**APM GE-6. Erosion Control and Sediment Transport Plan Implementation.** An Erosion Control and Sediment Transport Plan will be prepared in association with the SWPPP. This plan will be prepared in accordance with the State Water Board guidelines and other applicable BMPs. […]	Verify that the appropriate measures are incorporated into the Erosion Control and Sediment Transport Plan and that the plan is complete.	Prior to construction	
Hazards and Hazardous Materials				
D	**APM HM-1. Hazardous Substance Control and Emergency Response Plan Development and Implementation.** PG&E will submit a Hazardous Substance Control and Emergency Response Plan to the CPUC for recordkeeping at least 30 days prior to project construction. The plan will identify methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction through operation. The plan will require implementing appropriate control methods and approved containment and spill-control practices (i.e., spill control plan) for construction and materials stored on-site. All hazardous materials and hazardous wastes will be handled, stored, and disposed of, in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. With the exception of the poles, all hazardous materials will be collected in project-specific containers at the site, and transported to a PG&E service center designated as a PG&E consolidation site. Poles will be scheduled for transportation to the appropriate licensed Class 1 or a composite-lined portion of a solid waste landfill. The plan will include, but not be limited to, the following:	Verify that the appropriate measures are incorporated into the Hazardous Substance Control and Emergency Response Plan and that the plans are complete.	30 days prior to construction	

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
	▪ Proper disposal of potentially contaminated soils ▪ Vehicles and equipment parking near sensitive resource areas during construction ▪ Emergency response and reporting procedures to address hazardous material spills Emergency-spill supplies and equipment will be available to respond in a timely manner if an incident should occur. Response materials such as oil-absorbent material, tarps, and storage drums will be used as needed to contain and control any minor releases. A search of government databases indicates that there are no hazardous waste sites located within the project area. If hazardous materials are encountered in excavated soils or groundwater as noted through sheen, odor, or other non-typical appearance, 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, they will be managed, transported, and disposed of in accordance with federal, state, and local regulations. Removed wood poles will be collected in project-specific containers at a PG&E service center designated as a PG&E consolidation site. Poles will be scheduled for transport to an appropriate licensed Class 1 or composite lined portion of a solid waste landfill as containers are filled. Chemical Waste Management's Kettlemen Hills Facility is typically used. There is no disposal capacity issue at this facility associated with the treated wood poles generated by this project.			
D	**Mitigation Measure HM-2 (proposed to supersede APM HM-2 "Environmental Training and Monitoring Program (ETMP) Development and Implementation").** An ETMP shall be established to communicate to all field personnel any environmental concerns and appropriate work practices, including spill prevention and response measures and BMPs. The training program shall emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of flow paths to nearest water bodies) and shall include a review of all site-specific plans, including, but not limited to, the project's SWPPP, Erosion Control and Sediment Transport Plan, Health and Safety Plan, and Hazardous Substances Control and Emergency Response Plan. A PG&E-designated representative shall be identified to ensure that the plans are followed throughout the construction period. BMPs, as identified in the project SWPPP and Erosion Control and Sediment Transport Plan, shall be implemented during project construction to minimize the risk of an accidental release and to provide the necessary information for emergency response. A copy of the ETMP shall be submitted to the CPUC at least 30 days prior to construction. Training attendance sheet(s) shall be submitted to the CPUC after each training session.	Verify that appropriate information is included in the training material. Verify that all workers are trained through review of worker training confirmation forms/statements.	Prior to construction	
D	**APM HM-3. Project-specific Fire Prevention and Response Plan Development and Implementation.** PG&E will prepare and submit a Fire Prevention and Response Plan to the CPUC and to local fire protection authorities for notification at least 30 days prior to construction. The plan will include fire protection and prevention methods for all components of the project during construction. The plan will include procedures to reduce the potential for igniting combustible materials by preventing electrical hazards, use of flammable materials, and smoking onsite during construction and maintenance procedures. Project personnel will be directed to park away from dry vegetation; to equip vehicles with fire extinguishers; not to smoke; and to carry water, shovels, and fire extinguishers in times of high fire hazard.	Verify that the appropriate measures are incorporated into the Fire Prevention and Response Plan	30 days prior to construction	
D	**APM HM-4. Health and Safety Plan Development and Implementation.** PG&E will prepare a site-specific Health and Safety Plan (HSP) to ensure that potential safety hazards will be kept at a minimum. The HSP will include elements that establish worker training and emergency response procedures relevant to project activities. The plan will be submitted to the CPUC at least 30 days prior to construction for CPUC recordkeeping.	Verify that the appropriate measures are incorporated into the Health and Safety Plan and that the plan is complete.	30 days prior to construction	
Hydrology and Water Quality				
D	**APM WQ-1. Development and Implementation of a Stormwater Pollution Prevention Plan.** Following project approval, PG&E will prepare and implement a SWPPP to minimize construction impacts on surface and groundwater quality. Implementation of the SWPPP will help stabilize graded areas and waterways and reduce erosion and sedimentation. The plan will designate BMPs that will be adhered to during construction activities. Erosion and sediment control measures, such as straw wattles, water bars, covers, silt fences, and sensitive area access restrictions (e.g., flagging) will be installed before the onset of winter rains or any anticipated storm events. Mulching, seeding, or other suitable stabilization measures will be used to protect exposed areas during construction activities, as necessary. […]	Verify that the appropriate measures are incorporated into the Stormwater Pollution Prevention Plan and that the plan is complete.	Prior to construction	

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
D	**APM WQ-2. Environmental Training and Monitoring Program (ETMP) Development and Implementation.** Worker environmental awareness will communicate environmental issues and appropriate work practices specific to this project. This awareness will include spill prevention and response measures and proper BMP implementation. The SWPPP training will emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of flow paths to nearest waterbodies) and will include a review of all site-specific water quality requirements, including applicable portions of , the Erosion Control and Sediment Transport Plan, Health and Safety Plan, and PG&E's Hazardous Substances Control and Emergency Response program. Details about the program will be described in the SWPPP.	Verify that appropriate information is included in the training material. Verify that all workers are trained through review of worker training confirmation forms/statements.	Prior to construction	
D	**APM WQ-3. Preparation of an Erosion Control and Sediment Transport Plan (ECSTP).** PG&E will prepare an Erosion Control and Sediment Transport Plan (ECSTP) as an element of the SWPPP describing BMPs, to be used during construction. PG&E will ensure all BMPs are inspected before and after each storm event, maintained on a regular basis, and replaced as necessary through the course of construction. The plan will address construction in or near sensitive areas described in Section 3.4 Biological Resources. BMPs, where applicable will be designed based on specific criteria from recognized BMP design guidance manuals. Erosion-minimizing efforts may include measures such as: ▪ Avoiding excessive disturbance of steep slopes ▪ Defining ingress and egress within the project area ▪ Implementing a dust control program during construction ▪ Restricting access to sensitive areas (e.g. usage of silt fencing for the protection of wetland features) ▪ Using vehicle mats in wet areas ▪ Revegetating disturbed areas where applicable following construction ▪ Proper containment of stockpiled soils (including construction of berms in areas near water bodies, wetlands, or drainage channels) Erosion control measures identified in the ECSTP will be installed in an area before clearing begins during the wet season in that area and before the onset of winter rains or any anticipated storm events. Temporary measures such as silt fences or wattles, intended to minimize sediment transport from temporarily disturbed areas, will remain in place until disturbed areas have stabilized. Such temporary measures will be placed and monitored by a qualified inspector to ensure effectiveness and these measures are repaired as needed. PG&E will keep water equipment such as water trucks and water truck filling areas well-maintained and make repairs as soon as possible; will use water minimally for dust control and to clean construction areas and sweep and vacuum to the maximum extent possible; and will direct runoff to areas where it can be reused or absorbed into the ground. Water for dust control will be applied at a rate that will not lead to significant water runoff or potentially cause a nuisance. The ECSTP will be submitted to the CPUC for review at least 30 days prior to the commencement of construction. The plan will be revised and updated as needed, and resubmitted to the CPUC if construction activities evolve to the point that the existing approved ECSTP does not adequately address the project.	Verify that the appropriate measures are incorporated into the Erosion Control and Sediment Transport Plan. Confirm that the plan is complete and a part of the SWPPP	30 days prior to construction	
D	**APM WQ-8. Hazardous Substance Control and Emergency Response Plan.** PG&E has and will implement its system-wide program which includes established procedures for handling and managing hazardous substances and emergency response in the event of a hazardous substance spill. These procedures will add to the requirements in the project SWPPP. PG&E crew members will arrange to have emergency-spill supplies and equipment immediately available at all work areas. Oil-absorbent materials, tarps, and storage drums will be used to contain and control any minor releases. Detailed information for responding to accidental spills, and for handling any resulting hazardous materials, will be provided in the project's Hazardous Substances Control and Emergency Response Plan.	Verify that the required procedures are added to the SWPPP.	Prior to construction	
Land Use and Planning				
D	**APM AG-1. Public Education Program.** A governmental relations representative will provide local governmental agencies with a briefing of the project scope and schedule in advance of construction activities. A PG&E contact name and phone number will be provided for project related	Verify that the project scope and schedule are provided to the local government	Prior to construction	

Table 1: Preconstruction Mitigation Measures

D/F[1]	APMs/Mitigation Measure	Implementation	Schedule	Status
	inquiries.	agencies.		
D	**APM AG-2. Coordination with Nearby Residences.** PG&E will coordinate with property owners within 300 feet of the project area at least 30 days prior to construction to alert them of project activities.	Verify that nearby residents are notified of the construction schedule.	30 days prior to construction	
Noise				
D	**APM NS-8. Noise Disruption Minimization through Residential Notification.** PG&E will coordinate with San Luis Obispo County, the City of Atascadero, and the City of San Luis Obispo to notify residents that are located near the alignment of the timeframe for construction activities.	Verify that nearby residents are notified of the construction schedule.	Prior to construction	
Traffic and Transportation				
D	**APM TT-1. Impacts to Existing Traffic Flows.** PG&E will develop a project-specific Transportation Management Plan (TMP), which will be submitted to the CPUC for review at least 30 days prior to construction. The TMP will conform to the California Joint Utility Traffic Control Committee's Work Area Protection and Traffic Control Manual. The TMP will include the following: ▪ Standard safety practices, including installation of appropriate barriers between work zones and transportation facilities, placement of appropriate signage, and use of traffic control devices. ▪ Flaggers and/or signage will be used to guide vehicles through or around construction zones using proper construction techniques. ▪ Provision that all equipment and materials will be stored in designated staging areas on or adjacent to the work sites in a manner that minimizes traffic obstructions and maximizes sign visibility. ▪ Acceptable vehicle speeds on project roadways. Vehicle speeds will be limited to safe levels as appropriate for all roads, including access roads and overland routes without existing, posted speed limits. ▪ PG&E will avoid equipment/material transportation via helicopter, to the extent practical, during high traffic hours along the Highway 101 corridor. ▪ PG&E will obtain Cal Trans encroachment permits and comply with permit conditions as necessary.	Verify that the appropriate measures are incorporated into the Transportation Management Plan and that the plan is complete.	30 days prior to construction	
D	**APM TT-2. Lift Plan Development and Implementation.** A Lift Plan will be prepared and approved by the FAA prior to all construction helicopter operations and will not result in a change in air traffic patterns either temporarily or permanently. PG&E does not anticipate that residents will be required to temporarily vacate their homes. In the unlikely event that final construction plans and the Lift Plan require otherwise, PG&E will coordinate with potentially affected residents (providing a minimum of 30 days notice) to minimize the duration of the necessary work and any resultant inconvenience.	Verify that the appropriate measures are incorporated into the Lift Plan and that the plan is complete.	Prior to construction. 30 days prior to residential evacuation if necessary.	
D	**APM TT-4. Notification of Road Closure.** PG&E will coordinate with the users of Forest Service Road 30S11 to ensure that closure of the road will minimize any inconveniences, and will work with any affected parties to make alternative arrangement for access. PG&E will contact the City of San Luis Obispo at least one month prior to start of construction activities requiring temporary closures of the Reservoir Canyon Natural Reserve. PG&E will post signs on the road at public access points to inform bikers and hikers of the anticipated construction activity and to discourage access to areas of construction.	Verify that users of Forest Service Road 30S11 are notified of road closures.	30 days prior to road closures	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
Aesthetics				
F	**APM AE-1. Construction Activities.** PG&E will make an effort to keep construction activities as clean and inconspicuous as practical by storing building materials and equipment away from public view and keeping most construction activity within the right-of-way.	Verify construction area implements good housekeeping	During Construction	
F	**APM AE-3. New Source of Substantial Light or Glare Avoidance.** PG&E will replace the existing conductor with a non-specular conductor for the specific purpose of minimizing the reflectivity of any new project facilities.	Verify conductors properties meet standards	Post construction	
Air Quality				
D	**Mitigation Measure AQ-1 (proposed to supersede APM AQ-1 "Fugitive Dust Minimization").** PG&E shall, upon request by SLOCAPCD, provide documentation that the mower and project water truck have not been used for more than an average of 6 hours per day for the first quarter of project construction. Support documentation shall also be submitted to the CPUC.	Verify submittal of information to SLOCAPCD	After the first quarter of construction	
F	PG&E shall present revised calculations of air emissions using the specific fleet of PG&E vehicles to be used during quarter one to the SLOCAPCD prior to the start of construction. Documentation of approval of the revised calculation from SLOCAPCD shall be submitted to the CPUC. A Fugitive Dust Control Plan shall be developed at least 30 days prior to project construction. The plan shall be submitted to SLOCAPCD for approval. […]	Verify implementation of Fugitive Dust Control Plan	During construction	
F	**APM AQ-2. NOA Emissions Prevention.** The following measures will be implemented during construction. These measures are those required by SLOCAPCD District Rule 412 – Airborne Toxic Control Measures, Section 93105: Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations, part (e) for areas to be graded of one acre or less. ▪ Prior to any ground disturbance, sufficient water will be applied to the area to be disturbed to prevent visible emissions from crossing the property line. ▪ Areas to be graded or excavated will be kept adequately wetted to prevent visible emissions from crossing the property line. ▪ Construction vehicle speed at the work site will be limited to 15 mph or less. ▪ Equipment will be washed down before moving from the property onto a paved public road. ▪ Storage piles will be kept adequately wetted, treated with a chemical dust suppressant, or covered when material is not being added to or removed from the pile. ▪ Visible track-out on the paved public road will be cleaned using wet sweeping or a HEPA filter equipped vacuum device within 24 hours.	Verify implementation of Airborne Toxic Control Measures	During construction	
F	**Mitigation Measure AQ-3.** The following measures shall be implemented, as feasible, during construction to reduce toxic diesel PM emissions: 3. On- and off-road equipment shall be subject to the following restrictions: a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors; b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted; c. Alternative-fueled equipment shall be used whenever possible; and d. Signs that specify the no idling requirements shall be posted and enforced at the project area. 4. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(3) of CARB's In-Use off-Road Diesel regulation:www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.	Verify implementation of measures to reduce toxic diesel PM emissions	During construction	

[2] Verify through documentation (D) or field observation (F).

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	5. Signs shall be posted in the designated queuing areas and job sites to remind off-road equipment operators of the 5-minute idling limit.			
Greenhouse Gases				
F	**APM GHG-1. GHG Emissions Minimization.** The following measures will be implemented during construction to minimize GHG emissions. ▪ Identify park-and-ride facilities in the project vicinity and encourage construction workers to carpool to the job staging area to the extent feasible. The ability to develop an effective carpool program for the proposed project will depend upon the proximity of carpool facilities to the staging area, the geographical commute departure points of construction workers, and the extent to which carpooling will not adversely affect worker arrival time and the project's construction schedule. Crew transportation to the project site is addressed in Section 3.11 Transportation and Traffic. ▪ Minimize unnecessary construction vehicle idling time. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project will apply 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 for use immediately or continuously for construction activities, its engine 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. ▪ Minimize construction equipment exhaust by using low-emission or electric construction equipment where feasible. Portable diesel fueled construction equipment with engines 50 hp or larger and manufactured in 2000 or later will be registered under the California Air Resources Board (CARB) Statewide Portable Equipment Registration Program, or will meet at a minimum US EPA/CARB Tier 1 engine standards. ▪ Minimize welding and cutting by using compression of mechanical applications where practical and within standards. ▪ Encourage use of natural gas powered vehicles for passenger cars and light duty trucks where feasible and available. ▪ Encourage the recycling of construction waste where feasible.	Verify implementation of GHG emissions minimization measures	During construction	
Biological Resources				
D/F	**Mitigation Measure BO-1 (proposed to supersede APM BO-1 "Avoidance of and Minimization of Potential Impacts to Birds").** Removal of vegetation or any other ground disturbance activities shall not occur from February 1 to September 15 to avoid impacts to native breeding/nesting birds. If work during the breeding/nesting season cannot be avoided, a qualified biologist shall survey within the project footprint and encompassing adjacent habitats up to 500 feet from the project boundary for owls or raptors and up to 250 feet for all other bird species, unless state or federal protocols for listed or fully protected species dictate otherwise. Surveys shall occur within five working days of the start of construction or ground disturbing activities. If no active nests are found within the survey area, no further mitigation shall be necessary. If breeding activities and/or an active nest(s) are found within the survey area, a non-disturbance buffer shall be established at a minimum of 250 feet from breeding habitat/nest sites listed species, species of special concern, species protected under the Migratory Bird Treaty Act (raptors shall have a minimum of a 500 foot buffer established), or a qualified on-site biologist may determine a non-disturbance buffer distance sufficient to minimize disturbance based on the nest location, topography, cover, species' tolerance to disturbance, and type/duration of potential disturbance, as determined by the qualified on-site biologist. The appropriate agency(ies) shall be contacted regarding identified nests of listed and/or species of special concern.	Verify that surveys are performed according to requirements and buffers are established as necessary	February 1 to September 15	
F	If it is determined, based on the professional judgment of the biologist that work is unlikely to adversely impact the active nest(s) or disrupt breeding behavior, then work may proceed within the non-disturbance buffer as long as a qualified biologist is on site to monitor nest(s) for signs of disturbance. Alternatively, if it is determined that project activities are resulting in nest disturbance, no further work shall occur within the non-	Verify implementation of Avian Protection Plan	During construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	disturbance buffer(s) until the nest becomes inactive or the young have fledged, as determined by the biologist or by the appropriate agency. Monitoring guidelines shall be provided in an Avian Protection Plan to be submitted to USFWS and CDFG for review and approval prior to construction. Documentation of plan approval shall be submitted to the CPUC for record-keeping. Reconductoring the power lines shall conform to PG&E's most current version of Bird and Wildlife Protection Standards, and shall include the use of bird guards.			
F	**APM BO-2. General Avoidance of Biological Resources Impacts.** ▪ Litter and trash management. All food scraps, wrappers, food containers, cans, bottles, and other trash from the project area will be deposited in closed trash containers. Trash containers will be removed from the project area at the end of each working day. ▪ Parking. Vehicles and equipment will be parked on pavement, existing roads, and previously disturbed or developed areas or work areas as identified in this document. Off-road parking will only be permitted in previously identified and designated work areas. ▪ Route and speed limitations. Vehicles will be confined to established roadways and pre-approved access roads, overland routes and access areas. Access routes and temporary work areas will be limited to the minimum necessary to achieve the project goals. Routes and boundaries of work areas, including access roads, will be clearly mapped prior to initiating project construction. Vehicular speeds will be kept to 15 mph on unpaved roads. ▪ Maintenance and refueling. All equipment will be maintained such that there will be no leaks of automotive fluids such as fuels, solvents, or oils. All refueling and maintenance of vehicles and other construction equipment will be restricted to designated staging areas located at least 100 feet from any down gradient aquatic habitat unless otherwise isolated from habitat. Proper spill prevention and cleanup equipment will be maintained in all refueling areas. ▪ Minimization of fire hazard. During fire season in designated State Responsibility Areas, all motorized equipment driving off paved or maintained gravel/dirt roads will have federal or state approved spark arrestors. All off-road vehicles will be equipped with a backpack pump filled with water and a shovel. All fuel trucks will carry a large fire extinguisher with a minimum rating of 40 B:C, and all equipment parking and storage areas will be cleared of all flammable materials. ▪ Pets and firearms. No pets or firearms will be permitted at the project site.	Verify implementation of measures.	During construction	
F	**APM BO-3. Nesting Acorn Woodpeckers.** All woodpecker cavities in wood poles will be visually inspected prior to pole removal, if safe to do so. All poles having cavities that contain elliptical, white eggs or those cavities that have live chicks in a nest will be managed as a pole having an active woodpecker nest. Cavities having nests containing slightly glossy, pale bluish- or greenish-white colored eggs will be considered starling nests and are not afforded protection and no further action will be required. Prior to disturbing the pole, the entrance to the nest cavity will be covered with duct tape or other suitable adhesive product to prevent the eggs or chicks from falling out of the nest cavity. The orientation of the cavity opening will be noted for future reference, and will then be cut out the section of pole containing the active nest, 3 feet above the cavity and 3 feet below the cavity. The pole section containing the active nest will remain in a vertical position to minimize further disturbance to eggs or chicks in the nest. Once the replacement pole is set, the pole section containing the nest will be strapped to the replacement pole, orienting the cavity hole as noted prior to relocation. The section of pole containing the nest will be placed no lower than one-third the height of the pole. The pole section will be securely positioned on the replacement pole with rope or metal strapping. The adhesive cover will be removed over the cavity entrance. As a last step, the pole number, circuit name, number of chicks or eggs, date of relocation, and crew supervisor name will be documented and this nest relocation information will be sent electronically to Mike Best, PG&E Bird Protection Program Manager (MBB8). This information will be included in PG&E's annual report to the U.S. Fish and Wildlife Service as required by our Special Purpose Permit MB057942-0.	Verify that inspection of woodpecker cavities in wood poles occurs.	Prior to wood pole removal	
F	**Mitigation Measure BO-4 (proposed to supersede APM BO-4 "Pre-construction Surveys and Relocation of Species").**[…] Before the start of work each morning, the biologist shall check under any equipment and stored construction supplies left in the work area overnight within 300 feet of suitable habitat. All pole holes or tower leg holes, in suitable habitat, shall be backfilled or covered at the end of each work day to prevent entrapment	Verify completion of daily biological surveys	Start of each construction day for construction areas within 300 feet of	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	of special-status species. If CRLFs are encountered in the project area, work within 50 feet of the animal shall cease immediately and the USFWS-approved biologist shall be notified. Based on the professional judgment of the USFWS-approved biologist, and in coordination with the USFWS, if project activities can be conducted without harming or injuring the animal(s), the frog shall be left at the location of discovery and monitored by the USFWS-approved biologist. All project personnel shall be notified of the finding and at no time shall work occur within 50 feet of the animal without a biological monitor present. If it is determined by the USFWS-approved biologist that relocating the CRLF(s) is necessary, the following steps shall be followed: 1. Prior to handling and relocation, the USFWS-approved biologist shall take precautions to prevent introduction of amphibian diseases in accordance with the Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog (USFWS 2005). Equipment and clothing of biologists shall be disinfected prior to mobilizing to the action area to handle amphibians after working in other aquatic habitats. 2. If relocation of CRLF is determined to be necessary, CRLFs shall be captured by hand, dipnet, or other USFWS-approved methods; transported by hand, dipnet, or temporary holding container; and released as soon as practicable the same day of capture. Handling of CRLFs shall be avoided to the maximum extent practicable. Holding/transporting containers and dipnets shall be thoroughly cleaned and disinfected prior to transporting to the action area and shall be rinsed with freshwater on site immediately prior to usage unless doing so would result in the injury or death of the animal(s) due to the time delay. 3. CRLFs shall be relocated to the nearest suitable habitat outside of an area where actions could result in mortality, harm, or harassment. The individual(s) shall be released within suitable habitat at a location agreed upon by the USFWS. If suitable habitat cannot be identified, the USFWS shall be contacted to determine an acceptable alternative. Transporting CRLFs to a location other than the location described herein shall require authorization by the USFWS.		suitable habitat.	
F/D	**Mitigation Measure BO-5 (proposed to supersede APM BO-5 "Development and Implementation of a Worker Environmental Awareness Program" and APM BO-16 "Specialized CRLF Training").**[…] No construction worker shall be involved in field operations without having participated in this special-status species/sensitive habitat informational training. […].	Verify that all workers are trained through review of worker training confirmation forms/statements or by verifying that the training stickers is visible on the worker's hardhat.	During construction	
F	**APM BO-6. Designated Equipment Staging.** PG&E will restrict equipment to designated staging areas and roads to avoid disturbance to existing vegetation.	Verify that the location of equipment staging meets requirements	During construction	
F	**APM BO-7. Storm Water Permit.** PG&E will obtain coverage under the Construction Storm Water Permit Program and implement established Best Management Practices (BMPs) as identified by the Central Coast Regional Water Quality Control Board for erosion and sediment control. […]..	Verify implementation of BMPs	During construction	
F	**APM BO-8. Avoidance of Environmentally Sensitive Resource Areas.** Sensitive resources identified during pre-construction surveys in the project vicinity will be mapped and clearly marked in the field. Such areas will be avoided during construction to the extent practicable and/or additional measures specific to sensitive species types as described herein and that may be required by the USACE, FWS, CDFG, and RWQCB permits, will be implemented to avoid or minimize impacts.	Verify that sensitive resource areas are marked in the field and avoided.	During construction	
F	**APM BO-9. Biological Monitor On-site During Construction Activities in Sensitive Areas and Reporting and Communication.** A qualified biological monitor will be on-site during all ground-disturbing construction activities in or near sensitive habitats previously identified by a qualified biologist. The monitor will ensure implementation of and compliance with all avoidance and mitigation measures. The monitor will have the authority to stop work or determine alternative work practices in consultation with agencies and construction personnel as appropriate if construction activities are likely to impact sensitive biological resources. The biological monitor will document monitoring activities in daily logs to document construction activities and environmental compliance. The daily logs will be included in the project report submitted to the appropriate agencies	Verify that a biological monitor is present.	During ground disturbing activities	
D		Verify submittal of final project summary	90 days post construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	following completion of construction. The biological monitor will be responsible for reporting any capture and relocation, harm, entrapment, or death of a listed species to the USFWS and/or the CDFG and for reporting any permit violations in a timely manner and as indicated in their respective permits. Weekly monitoring reports will be submitted to CPUC, and to any resource agencies (upon request), throughout construction. A final project summary report will be submitted to the CPUC 90 days after the completion of construction activities.			
F	**APM BO-10. Restricted Construction Hours.** Construction activities within 300 feet of suitable aquatic habitat will not begin prior to 30 minutes after sunrise and will cease no later than 30 minutes before sunset	Verify that the daily construction schedule meets requirements of measure.	During construction within 300 feet of suitable aquatic habitat	
F	**APM BO-11. Helicopter Avoidance of Known Nesting Birds.** PG&E will avoid helicopter flights near known active nesting bird sites as determined in consultation with the USFWS and/or CDFG.	Verify that helicopter use avoids active nesting birds	During helicopter use	
F	**APM BO-12. Avoidance of and Minimization of Potential Impacts to Wetlands and Water Resources.** A Stormwater Pollution Prevention Plan (SWPPP) will be developed that describes sediment and hazardous materials control, fueling and equipment management practices, and other factors deemed necessary for the project. Erosion control measures will be implemented where necessary to reduce erosion and sedimentation in wetlands, waters of the United States, and waters of the state, as well as aquatic habitat occupied by sensitive species. Erosion control measures will be monitored on a regularly scheduled basis, particularly during times of heavy rainfall. Corrective measures will be implemented in the event erosion control strategies are inadequate. Sediment/erosion control measures will be continued at the project site until such time that soil stabilization is deemed adequate. Brush or other similar debris material will not be placed within any stream channel or on its banks. No project work activity is planned within the limits of any stream channel.	Verify implementation of SWPPP.	During construction	
F	**APM BO-13. Avoidance of Impacts to Natural Habitats.** Clearing and grading will be limited to previous access roads that have become overgrown with vegetation. Vegetation will be cut at ground level and leave existing root systems intact where possible.	Verify that the vegetation trimming methods meet requirements.	During grading and vegetation trimming	
F	**Mitigation Measure BO-14 (proposed to supersede APM BO-14 "Avoidance of CRLF Habitat").** PG&E shall install exclusion fencing around aquatic habitat in areas where construction activities are within the vicinity of aquatic habitat (the upland habitat buffer). […]These areas shall be avoided by all construction personnel. The fencing shall be inspected before the start of each workday and maintained until completion of the project. Only when the construction of the project is completed in that area shall the fencing be removed.	Verify that exclusion fencing are maintained and exclusion areas are avoided.	During construction within the vicinity of aquatic habitat	
F	**APM BO-15. Fencing of Staging Areas within Proposed Critical Habitat Boundaries.** PG&E will install exclusion fencing around staging areas that will be used during the typical CRLF avoidance window, from April 1 through November 1, within the proposed critical habitat boundaries. […]The fencing will be inspected and maintained during the avoidance window until completion of the project. Only when the construction of the project, in a specified area, is completed, will the fencing be removed.	Verify that exclusion fencing around staging area are maintained.	April 1 through November 1 within critical habitat boundaries	
F	**APM BO-17. Qualified Biologist CRLF Inspection.** PG&E will obtain Section 7 of the Federal Endangered Species Act coverage under the Programmatic Biological Opinion for CRLF. […]. A USFWS-approved biologist will survey the work site, locations that include the primary constituent elements of suitable habitat, a minimum of two weeks before the onset of activities. […]After this time, the contractor or permittee will designate a person to monitor on-site compliance with all minimization measures. The USFWS-approved biologist will ensure that this individual receives training outlined above and in the identification of the CRLF. The monitor and the USFWS-approved biologist will have the authority to halt any action that might result in impacts that exceed the levels anticipated by the USACE and USFWS during review of the proposed action. If work is stopped, the USACE and USFWS will be notified immediately by the USFWS-approved biologist or on-site biological monitor.	Verify that a biological monitor is present as required.	During construction within CRLF habitat	
F	**APM BO-18. Work Timing Window to Protect CRLF.** PG&E will complete work activities within California red-legged frog proposed critical habitat areas between April 1 and November 1. If PG&E demonstrates a need to conduct activities outside this period, the USACE may authorize such activities after obtaining the USFWS's approval	Verify that construction timing within critical habitat meets requirements.	April 1 and November 1	
F	**APM BO-19. Dewatering Method that Protects CRLF.** If a work site is to be temporarily dewatered by pumping, intakes will be completely screened	Verify that dewatering methods	During dewatering	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	with wire mesh not larger than five millimeters (mm) to prevent CRLF from entering the pump system. Water will be released or pumped downstream at an appropriate rate to maintain downstream flows during construction. Upon completion of construction activities, any barriers to flow will be removed in a manner that will allow flow to resume with the least disturbance to the substrate.	meet requirements.	activities	
F	**APM BO-20. Removal of Exotic Species.** A USFWS-approved biologist will permanently remove, from within the project area, any individuals of exotic species identified during regular surveys or monitoring, such as bullfrogs, crayfish, and centrarchid fishes, to the maximum extent possible. The permittee will have the responsibility to ensure that their activities are in compliance with the CDFG.	Verify that exotic species are removed.	During construction	
F	**Mitigation Measure BO-21 (proposed to supersede APM BO-21 "Refueling and Equipment Maintenance Methods that Protect CRLF").** All fueling and maintenance of vehicles and other equipment and staging shall only occur at distances greater than 100 feet from any riparian habitat or water body. The USACE and the permittee shall ensure contamination of habitat does not occur during such activities.[…]	Verify that location of fueling and maintenance activities meet requirements.	During construction	
F	**APM BO-22. Limitation of Vehicle Access, Potential Impact Areas, and Potential Disturbance.** PG&E will limit the number of access routes, number and size of staging areas, and the total area of the proposed project activity to the minimum necessary. Routes and boundaries will be clearly demarcated. Movement of heavy equipment to and from the project site will be restricted to established roadways where possible to minimize habitat disturbance. If saturated soils are encountered, timber mats will be employed to prevent rutting and compaction. Staging areas will be located outside of an appropriate buffer established from aquatic habitat.	Verify that the demarcation of routes and boundaries and use of timber mats meets requirements	During construction	
F	**APM BO-23. Staging and Stockpiling Restrictions.** During construction, PG&E will restrict stockpiling of construction materials, portable equipment, vehicles, and supplies to the designated construction staging areas. PG&E will ensure that contamination of habitat does not occur during such operations. All workers will be informed of the importance of preventing spills and the appropriate measures to take should a spill occur.	Verify that the location of equipment staging meets requirements	During construction	
F	**APM BO-27. Biological Monitoring of Existing Bats in Project Area.** In the event that a roosting bat or maternity colony occurs within or near the project area, a qualified biological monitor will be provided and will remain on-site during construction activities to ensure there is no nest abandonment.	Verify that a biological monitor is present.	During construction near a roosting bat or maternity colony	
F	**Mitigation Measure BO-28 (proposed to supersede APM BO-28 "Implementation of Revegetation and Monitoring Plan" and APM AE-4 "Revegetation and Regrading").** PG&E shall prepare a Revegetation and Monitoring Plan prior to construction. .[…]	Verify implementation of Revegetation and Monitoring Plan	Post construction	
D	**Mitigation Measure BO-29 (proposed to supersede APM BO-29 "Avoidance of and Minimization of Potential Impacts to Special-Status Plants").** The following measures shall be implemented: a. Focused botanical surveys within suitable habitat shall be conducted during the appropriate blooming period for the following species to determine if additional special-status plant species that have the potential to occur are present within the work areas: – La Panza mariposa lily *(Calochortus simulans)* – Round-leaved filaree *(California macrophylla)* – Hardham's evening primrose *(Camissonia hardhamiae)* – San Luis Obispo owl's-clover *(Castilleja densiflora ssp. obispoensis)* – Ojai fritillary *(Fritillaria ojaiensis)* – San Benito fritillary *(Fritillaria viridea)* – Jones' layia *(Layia jonesii)* – Chaparral ragwort *(Senecio aphanactis)* – Most beautiful jewel-flower *(Streptanthus albidus ssp. peramoenus)*	Verify completion of botanical surveys	During appropriate blooming periods for specific species	
F		Verify implementation of minimization of special status plant impact measures.	During construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	– Caper-fruited tropidocarpum *(Tropidocarpum capparideum)* b. […] c. Work within areas occupied by special-status plant species shall be limited to existing access roads and to the smallest area that is safely practical. Where possible, staging areas, spoils storage, and equipment/vehicle parking shall be restricted to areas outside of where special-status plant species are located. d. If possible, for annual plant species, timing of work activities within areas occupied by special-status plant species shall occur after seeds have set in the spring but prior to fall rains to minimize project effects on the seed bank. e. Mature seeds shall be collected from sensitive plant species that are likely to be impacted by project construction activities. The seeds shall be properly stored for post-construction propagation and re-establishment. Sensitive plants that are likely to be impacted shall be translocated, if possible, under the supervision of the project biologist by digging up the plant and replanting it in suitable habitat. f. If ground disturbance is required in an area, the first 6 inches of topsoil, if available, within occupied habitat shall be stored separately on site and protected from exotic weeds seed dispersal. The stored soil shall be used as topsoil when soils are redistributed to the project sites during post-construction in an attempt to salvage any viable seeds in the seed bank. g. In the event that any special-status plants cannot be avoided, PG&E shall consult with the USFWS and/or the California Department of Fish and Game (CDFG) (depending on whether the species is on the federal or state list of sensitive species) to determine the appropriate measures to minimize effects to the species and its habitat during construction and operation of the project. The CPUC shall be informed of the results of any agency consultations. A mitigation and monitoring plan may be required that identifies the impacts to special-status plant species and remedial actions to mitigate impacts. Monitoring may be required for subsequent years to ensure compliance with mitigation activities and evaluate plant recovery. In addition to the aforementioned avoidance measures, the following plant-specific mitigation measures shall be implemented: a. San Luis Obispo Dudleya: Any damaged plants shall be salvaged by moving them into in a botanical garden for cultivation. Salvaged individuals may be replanted in suitable areas as identified by the biologist during post-construction. b. San Luis Mariposa Lily and Mesa Horkelia: Any damaged plants shall be salvaged by digging up bulbs (San Luis Mariposa Lily) or plants (Mesa Horkelia) to be replanted in suitable areas as identified by the biologist during post-construction. Seeds for replanting shall also be collected from plants that are likely to be impacted. c. Brewer's Spineflower and Straight-awned Spineflower: Work shall occur after plants have dispersed their seeds for the year and during the dry season (May 1 to October 15). If construction is to occur during the active growth and flowering period, individual species shall be flagged and avoided. Individuals collected shall be counted and reported. Plants located in impacted areas shall be monitored during subsequent growing seasons post-construction. Supplemental seeding from garden-grown seeds shall occur if necessary. Santa Lucia Manzanita: Damage to shrub branches shall be avoided. All damaged branches shall be removed and discarded.			
F	**APM BO-30. Weed Control.** PG&E will clean equipment and vehicles prior to arriving on-site. Equipment will be inspected and cleaned as needed prior to use in areas with rare plants. […]When practicable, invasive exotic plant in the project areas will be removed. The weed control measures under the Special Status Plants heading below describe the steps that PG&E will be taking. […] Gravel used for road maintenance will be from weed free-sources. […]	Verify equipment is cleaned and invasive species are removed as practicable	During construction	
F	**APM BO-31. Implementation of Dust Control Plan.** PG&E will prepare a Dust Control Plan prior to construction in coordination with the appropriate agencies to ensure impacts to special-status plants and associated vegetation communities are avoided or minimized.	Verify implementation of Dust Control Plan	During construction	
F	**APM BO-32. Hazardous Substance Control and Emergency Response Plan.** PG&E has and will implement its system-wide program which includes	Verify implementation of	During hazardous	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	established procedures for handling and managing hazardous substances and emergency response in the event of a hazardous substance spill.	Hazardous Substance Control and Emergency Response Plan	substance spill	
F	**APM BO-33. Project-specific Fire Prevention and Response Plan Development and Implementation.** PG&E will incorporate established system-wide Fire Prevention and Response procedures that will include reducing the potential for igniting combustible materials. The procedures will cover electrical hazards, flammable materials, smoking, vehicle and equipment access, and fire watches during construction and maintenance procedures during subsequent operation. Project personnel will be directed to park away from dry vegetation; not to smoke; and to equip vehicles with appropriate firefighting equipment; such as water dispensers and shovels, in times of high fire hazard. The procedures will also describe methods to reduce the potential fire hazard from operation of the power line.	Verify implementation of Fire Prevention and Response procedures	During construction	
F	**APM BO-34. Restricted Access to Pole 66/10.** Pole 66/10, which is located in a seasonal wetland, will be accessed from the south side in order to prevent having to cross the drainage north of Pole 66/10 (shown as S17 in the Wetland Delineation Report). Trampling and compaction of the wetland at Pole 66/10 will be minimized. If necessary, timber mats will be installed to avoid surface disturbance to this wetland from equipment.	Verify road condition of access road to Pole 66/10	During construction around Pole 66/10	
F/D	**Mitigation Measure BO-35 (proposed to supersede APM BO-35 "Water-crossing Construction Timing" and APM WQ-9 "Water-crossing Construction Timing").** Water-crossing construction shall be scheduled during dry months, typically between May 1 and October 15, when the waterways have low or no flow, to minimize potential impacts.	Verify that schedule of water crossing construction meets requirements.	During dry month May 1 and October 15	
F	**Mitigation Measure BO-36 (proposed to supersede APM BO-36 "Use of Coffer Dams" and APM WQ-10 "Use of Coffer Dams").** If any creek flow is present during installation of a permanent culvert along the access road to Tower 69/0 a coffer dam shall be installed and the entire flow of the creek shall be diverted around the work area during construction. The water diversion system shall comply with Section 404 of the Clean Water Act and/or Section 1602 of the Fish and Game Code. Measures, such as the following, shall be implemented prior to installation of, during the use of, and during the removal of, as appropriate, the coffer dam: a. Water shall be diverted by use of appropriate-sized flumes or pumps capable of handling 150 percent of the anticipated flows. b. Water discharge rates shall be controlled by use of energy dissipaters to avoid downstream erosion and water quality degradation, as necessary. c. Water quality (turbidity) shall be monitored during construction downstream of the flume or pump discharge point to ensure no significant impacts to water quality occur. d. Restoration of impacted areas outside of the road prism shall occur immediately after the culvert is installed and the coffer dam is removed. Documentation of studies, construction activities, monitoring, and restoration shall be submitted to the CPUC upon completion of each task.	Verify installation of culvert at access road Tower 69/0 is in accordance with the measures	During culvert installation at access road to Tower 69/0	
D		Verify submittal of the documentation of studies, construction activities, monitoring, and restoration.	At the completion of each task during culvert installation	
F	**APM BO-37. Sediment Barriers to Protect Wetland (W3).** Sediment barriers between the wetland and the access road that leads to Tower 73/1 will be maintained while re-establishing this road.	Verify that sediment barriers are maintained.	During Tower 73/1 road reestablishment	
D	**Mitigation Measure BO-38 (proposed to supersede APM BO-38 "Reporting Requirement").** PG&E shall prepare a compliance certification to be filed with the USACE and the USFWS to certify, after completion of construction, that the project was completed in accordance with the permit conditions. The information contained in the compliance certification shall include: 1. The type(s) of action(s) that occurred; 2. The number of acres affected and habitat type (e.g., upland or riparian.); 3. The linear feet of work; 4. How the site(s) was restored and a description of the area after the completion of the action; 5. What measures were employed to protect CRLF;	Verify the submittal of the USFWS/USACE final report.	Post construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	6. How the site(s) was restored or, if no restoration occurred, the justification for not conducting this work; and 7. A description of the area after completion of the action. Each compliance certification provided by PG&E shall contain maps, as appropriate, that indicate the location of all actions. Each report shall have a table and photos cross-referenced to locations on the map as appropriate. The compliance certification shall also document the number of CRLFs that were known to be taken, and the form of take (e.g., harassment by moving or mortality) during project activities. The USFWS recognizes that accurately quantifying the number of individuals that may have been taken may not be possible; in these cases, the reporting of all observations and relative numbers shall provide useful information. The report shall also recommend modifications to future measures to enhance the protection of the CRLF. A copy of the certified compliance certificate shall be submitted to CPUC once provided by USACE and USFWS.			
F	**Mitigation Measure BO-39.** To prevent CRLFs and other amphibians and reptiles from becoming entangled or trapped in erosion control materials, plastic mono-filament netting (i.e., erosion control matting) or similar material shall not be used within the project area. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.	Verify the implementation of the erosion control material	During construction	
Cultural Resources				
F	**Mitigation Measure CR-1 (proposed to supersede APM CR-1 "Archaeological and Paleontological Site Avoidance").** At historical sites P-40-041211 and P-40-040213 and any other known cultural resources within 50 meters of the project area, the limits of the project area near the resource shall be marked with visible flagging tape prior to construction. The construction crews shall be instructed that no vehicle access, travel, equipment staging, storage, or other construction-related work shall occur outside the flagged areas to ensure known cultural resources are not inadvertently damaged during implementation of the project. PG&E shall avoid known cultural resources. Poles, towers, or other facilities shall be relocated, if necessary, to avoid these resources.	Verify that flagging is visible and exclusion areas are avoided.	During construction	
F	**APM CR-3. Unanticipated Discoveries Management.** In the unlikely event that previously unidentified cultural resources are uncovered during implementation of the project, all work within 165 feet (50 meters) of the discovery will be halted and redirected to another location. PG&E's cultural resource specialist or his/her designated representative will inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California State Department of Parks and Recreation cultural resource record forms and no further effort will be required. If the resource cannot be avoided and may be subject to further impact, PG&E will evaluate the significance and CRHR eligibility of the resource and implement data recovery excavation or other appropriate treatment measures if warranted. In the unlikely event that previously unidentified paleontological resources are uncovered during implementation of the project, all ground disturbing work will be temporarily halted or diverted away from the discovery to another location. PG&E's paleontological resources specialist or his/her designated representative will inspect the discovery and determine whether further investigation is required. If the discovery is significant, but can be avoided and no further impacts will occur, the resource will be documented in the appropriate paleontological resource records and no further effort will be required. If the resource is significant, but cannot be avoided and may be subject to further impact, PG&E will evaluate the significance of the resources, and implement data recovery excavation or other appropriate treatment measures as recommended by a qualified paleontologist.	Verify that work is halted and proper procedures are followed in the event of a discovery.	During the discovery of unanticipated cultural resources	
F	**Mitigation Measure CR-5.** […]During construction, deeper excavations or grading (more than 2' deep, excluding augering or hand-digging for pole or tower fitting holes) in high-sensitivity units shall be monitored closely by a qualified Principal Paleontologist or his/her designated assistant. Paleontological monitors shall have the authority to temporarily halt or redirect work at specific locations in order to assess and/or recover paleontological remains, and to establish buffer zones around potentially significant specimens using flagging on lath until the find is assessed by the Principal Paleontologist. The paleontological monitor will maintain a daily log of monitoring activities to document the location of monitoring, observations of sediment type and distribution, observations regarding fossils, collection of fossils and other information. Daily logs and photographs will be supplied to the Principal Paleontologist. Upon completion of construction, if no paleontological resources are identified during the project, the Principal	Verify that excavations are monitored in accordance with requirements.	During excavations of 2 feet or greater depth or during grading	
D		Verify that the content and submittal of final summary report meet requirements.	Post construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	Paleontologist will compile a simple summary letter report of monitoring. A copy of the summary report shall be submitted to the CPUC for recordkeeping. If paleontological resources are identified, upon completion of construction, the Principal Paleontologist shall compile a final monitoring report. This report shall include, but shall not be limited to: 1. Inclusive dates of monitoring 2. Present personnel qualifications 3. Summary of the monitoring effort and coverage using text and maps 4. Documentation of paleontological localities discovered and resources identified 5. Interpretation fossil discoveries 6. Evaluation of the adequacy of the monitoring effort 7. Suggestions for improving paleontological resource monitoring procedures A copy of the final monitoring report shall be submitted to the CPUC for recordkeeping.			
F	**Mitigation Measure CR-6.** If previously unidentified paleontological resources are uncovered during implementation of the project, all ground disturbing work shall be temporarily halted or diverted away from the discovery to another location. PG&E's paleontological resources specialist (i.e., a Principal Paleontologist qualified according to SVP standards) or his/her designated representative shall inspect the discovery and determine whether further investigation is required. If the discovery is determined to be "unique" under CEQA, but can be avoided and no further impacts shall occur, the resource and locality shall be documented in the appropriate paleontological resource records and no further effort shall be required. Locality documentation shall include: 1. One or more UTM readings using a global positioning system unit 2. Accurate elevation measurement 3. Depth below surface 4. Lithologic analysis 5. Detailed field map of the locality Additional information may include: a. One or more stratigraphic columns b. Sedimentary structure analysis c. Taphonomic analysis and photographs of the fossil in situ, if recommended by the Principal Paleontologist If the resource is determined to be "unique" under CEQA and cannot be avoided and may be subject to further impact, PG&E shall ensure that the fossils are recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified Principal Paleontologist. All recovered fossils shall be curated at an accredited and permanent scientific institution according to SVP standards; typically the Natural History Museum of Los Angeles County and UC Berkeley accept paleontological collections at no cost to the donor.	Verify work is halted and proper procedures are followed in the event of a discovery.	During the discovery of unanticipated paleontological resources	
Geology and Soils				
F	**APM GE-3. Slope Instability During Construction Minimization.** During pole replacement activities along the hilly terrain, construction slopes and existing natural slopes impacted by construction operations will be evaluated for stability. In developing grading plans and construction procedures for re-establishing access roads and replacing power poles, slope stability will be analyzed. Construction slopes and grading plans will be designed to limit the potential for slope instability and minimize the potential for erosion and flooding during construction. The project will not result in any new cut or fill slopes, either permanent or temporary. Construction activities likely to result in slope instability will be suspended, as necessary, during and	Verify work is halted if work would result in slope instability. Verify that slope stability issues are not occurring during construction.	During pole replacement	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	immediately following periods of heavy precipitation when unstable slopes are more susceptible to failure.			
F/D	**Mitigation Measure GE-4 (proposed to supersede APM GE-4 "Avoid Unstable Slope Elements").** During construction, PG&E shall avoid areas where boulders on slopes could pose risks to structures, where feasible. If avoidance of areas just downslope of boulders is not possible, PG&E shall either remove or stabilize boulders located immediately uphill of structures that pose potential high risk of damage to those structures. In addition, PG&E shall position structures to span over potential landslide areas or relocate structures to avoid landslide hazards. Boulder removal shall involve either removal of intact boulders or removal of boulders that have been fractured into multiple pieces. A qualified geotechnical engineer shall evaluate boulders to determine the best methods to stabilize boulders located upslope of project structures that are removed. Recommendations shall be developed and implemented to mitigate hazards posed by the boulders. Boulder stabilization could involve any of the following practices, but is not limited to: 1. Installing and securing wire mesh on the downslope side of the boulder, as approved by a qualified biologist; 2. Installing rock anchors and shotcrete; 3. Depending on the slope on which the boulder rests, constructing an earthen berm in front of the boulder on the downslope side; or Other methods recommended by a geotechnical expert.	Verify that a geotechnical engineer evaluates boulders as necessary.	During construction in area where boulders pose risks to structures	
F	**APM GE-5. Soft or Loose Soils During Construction Minimization.** Where soft or loose soils are encountered during construction, appropriate measures will be implemented to avoid, accommodate, replace, or improve soft or loose soils encountered during construction. Such measures may include: ▪ Locating construction facilities and operations away from areas of soft and loose soil. ▪ Over-excavating soft or loose soils and replacing them with engineered backfill materials. ▪ Increasing the density and strength of soft or loose soils through mechanical vibration and/or compaction. ▪ Treating soft or loose soils in place with binding or cementing agents. Construction activities in areas where soft or loose soils are encountered will be scheduled for the dry season to allow safe and reliable equipment access.	Verify the implementation minimization measures for stabilizing loose soils.	During construction in soft or loose soils	
F	**APM GE-6. Erosion Control and Sediment Transport Plan Implementation.** An Erosion Control and Sediment Transport Plan will be prepared in association with the SWPPP. This plan will be prepared in accordance with the State Water Board guidelines and other applicable BMPs. Implementation of the plan will help stabilize disturbed areas and waterways and will reduce erosion and sedimentation. The plan will designate BMPs that will be followed during construction activities. Erosion-minimizing efforts may include measures such as: ▪ Avoiding excessive disturbance of steep slopes, ▪ Using drainage control structures (straw wattles or silt fencing) to direct surface runoff away from disturbed areas, ▪ Strictly controlling vehicular traffic, ▪ Implementing a dust-control program during construction, ▪ Restricting access to sensitive areas, ▪ Using vehicle mats in wet areas, and ▪ Revegetating disturbed areas where applicable following construction. In areas where soils are to be temporarily stockpiled, soils will be placed in a controlled area and will be managed with similar erosion control techniques. Where construction activities occur near a drainage channel and drainage from these areas flows towards a water body, stockpiles will be placed at least 100 feet from the water body or will be properly contained (such as covering with plastic sheeting to minimize risk of sediment transport to the drainage). Plywood and plastic covering will be used to cover the excavated holes until pole installation activities begin.	Verify implementation of Erosion Control and Sediment Transport plan.	During construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	Erosion-control measures will be installed, as necessary, before any clearing during the wet season and before the onset of winter rains. Temporary measures such as silt fences or straw wattles intended to minimize erosion from temporarily disturbed areas will remain in place until disturbed areas have stabilized. The SWPPP will be designed specifically for the hydrologic setting of the proposed project, which includes slopes, intermittent and seasonal streams, and the Salinas River. BMPs documented in the Erosion Control and Sediment Transport Plan will also be included in the SWPPP.			
F	**APM GE-7. Minimize Road Construction.** PG&E is not planning on constructing new access roads, but instead utilizing existing access roads. Some roads will require minimal grading to re-establish the road integrity and allow safe movement for construction equipment and/or moving or trimming of vegetation to allow vehicle passage. In these cases, PG&E will implement BMPs for road re-establishment; and these modifications will be permanent for continued use of the roads for power line maintenance, eliminating long-term impacts from temporary roads.	Verify implementation of road re-establishment BMPs.	During reestablishing of existing roads	
F	**APM GE-8. Minimize Soil and Bedrock Impact to Foundation Design.** Appropriate design measures for protection of reinforcement, concrete, and metal-structural components against corrosion will be utilized, such as the use of corrosion-resistant materials and coatings, increased thickness of project components exposed to potentially corrosive conditions, and use of passive and/or active cathodic protection systems.	Verify implementation of appropriate design measures.	During construction	
Hazards and Hazardous Materials				
F	**APM HM-1. Hazardous Substance Control and Emergency Response Plan Development and Implementation.** PG&E will submit a Hazardous Substance Control and Emergency Response Plan[…] The plan will identify methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction through operation. The plan will require implementing appropriate control methods and approved containment and spill-control practices (i.e., spill control plan) for construction and materials stored on-site. […]	Verify implementation of Hazardous Substance Control and Emergency Response Plan.	During construction	
F	**APM HM-3. Project-specific Fire Prevention and Response Plan Development and Implementation.** PG&E will prepare and submit a Fire Prevention and Response Plan to the CPUC and to local fire protection authorities for notification at least 30 days prior to construction. […]	Verify implementation of Fire Prevention and Response Plan.	During construction	
F	**APM HM-4. Health and Safety Plan Development and Implementation.** PG&E will prepare a site-specific Health and Safety Plan (HSP) to ensure that potential safety hazards will be kept at a minimum. […]	Verify implementation of Health and Safety Plan.	During construction	
F	**APM HM-5. Safe Practices and Record Keeping for Storage of Chemicals On-site.** If it is necessary to store any chemicals on-site, they will be managed in accordance with all applicable regulations. Material Safety Data Sheets will be maintained and kept available on-site, as applicable.	Verify MSDS are on site and chemical are stored properly.	During construction	
D/F	**APM HM-6. Safety Precautions Used for Removal of Contaminated Soils.** In the event that soils suspected of being contaminated (based on evidence from visual, olfactory, or other means) are removed during excavation activities along the power line corridor, the excavated soil will be tested and, if contaminated above hazardous levels, will be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.	Verify the testing of suspected contaminated soils.	During removal of suspected contaminated soils	
Water Quality				
F	**APM WQ-1. Development and Implementation of a Stormwater Pollution Prevention Plan.** Following project approval, PG&E will prepare and implement a SWPPP to minimize construction impacts on surface and groundwater quality. […] During construction, measures will be in place to ensure that contaminants are not discharged from the construction sites.	Verify implementation of Stormwater Pollution Prevention Plan.	During construction	
F	**APM WQ-3. Preparation of an Erosion Control and Sediment Transport Plan (ECSTP).** PG&E will prepare an Erosion Control and Sediment Transport Plan (ECSTP) […]	Verify implementation of Erosion Control and Sediment Transport Plan.	During construction	
F	**APM WQ-4. Limited On-site Vehicle and Equipment Fueling.** PG&E will use offsite fueling stations to the extent possible, including refueling of helicopters. On-site fueling is not likely, however, if necessary, conditions specified in SWPPP will be implemented. No refueling or fuel storage will	Verify that refueling location	During construction	

Table 2: Construction Mitigation Measures

D/F[2]	APM	Implementation	Schedule	Status
	occur within 100 feet of sensitive areas, including intermittent streams, wetlands, biological and cultural areas, or within 150 feet of wells, unless otherwise approved by the environmental inspector.	meets requirements.		
F	**APM WQ-5. Proper Concrete Curing Techniques.** PG&E will use proper storage and handling techniques for concrete curing compounds and will protect drain inlets prior to the application of curing compounds. If necessary, concrete washout will be performed in a designated area to be determined in the field and in the SWPPP, or concrete trucks will provide self-contained cleanout units. Temporary concrete washout facilities will be located a minimum of 50 feet from storm drain inlets, open drainage facilities, and watercourses. Concrete will be washed only from mixer chutes into approved concrete washout facilities. Concrete washout from concrete pumper bins can be washed into concrete pumper trucks and discharged into designated washout areas or properly disposed of offsite.	Verify implementation of appropriate measure for concrete curing	During concrete curing	
F	**APM WQ-6. Proper Sanitary/Septic Waste Management.** PG&E will locate sanitary facilities away from drainage facilities and watercourses and at least 100 feet from sensitive areas in a location convenient for pump-out; ensure that no untreated raw wastewater will be discharged or buried; treat temporary septic systems wastes to appropriate levels before discharging; and arrange for regular waste collection by a licensed hauler before facilities overflow.	Verify that the location of the sanitation facilities meets requirements	During construction	
F	**APM WQ-7. Restricted Access to Pole 66/10.** Pole 66/10, which is located in a seasonal wetland, shall be accessed from the south side to eliminate the need to cross the drainage north of Pole 66/10 (shown as S17 in the Wetland Delineation Report). Trampling and compaction of the wetland at Pole 66/10 shall be minimized. If necessary, timber mats shall be installed to avoid surface disturbance to the wetland from equipment.	Verify road condition of the access route to Pole 66/10	During construction at Pole 66/10	
F	**APM WQ-11. Sediment Barriers to Protect Wetland (W3).** Sediment barriers between the wetland and the access road that leads to Tower 73/1 will be maintained while re-establishing this road.	Verify maintenance of access road to Tower 73/1	During construction at Pole 73/1	
Noise				
F	**APM NS-1. Noise Minimization with "Quiet" Equipment.** "Quiet" equipment (i.e., equipment that incorporates noise control elements into the design—compressors have "quiet" models) will be used during construction whenever possible.	Verify use of quiet equipment, when possible.	During construction	
F	**APM NS-2. PG&E Construction Hours.** PG&E will limit construction to the hours between 7 a.m. and 7 p.m., Monday through Saturday, to the extent feasible. If nighttime work is needed because of clearance restrictions on the power line, PG&E will take appropriate measures to minimize disturbance to local residents, including contacting nearby residences to inform them of the work schedule and probable inconveniences.	Verify that the hours of construction meets requirements	During construction	
F	**APM NS-3. Limit of Unnecessary Engine Idling.** PG&E will encourage construction crews to limit unnecessary engine idling. (See Air Quality measures.)	Verify that the engine idling time meets requirements	During construction	
F	**APM NS-4. Equipment Noise Emissions.** PG&E construction crews will use equipment that is specifically designed for low noise emissions.	Verify use of low noise emission equipment.	During construction	
F	**APM NS-5. Noise Minimization with Portable Barriers.** Compressors and other small stationary equipment will be shielded with enclosures or portable barriers when used in proximity to residential areas.	Verify use of noise barriers as appropriate.	During construction	
F	**APM NS-6. Noise Minimization through Direction of Exhaust.** Equipment exhaust stacks and vents will be directed away from buildings, to the extent feasible for crews to comply with safe work procedures.	Verify that the exhaust stack directions meets requirements	During construction	
F	**APM NS-7. Noise Minimization through Truck Traffic Routing.** Truck traffic will be routed away from noise-sensitive areas where feasible.	Verify that the truck traffic routing meets requirements	During construction	
Traffic and Transportation				
F	**APM TT-1. Impacts to Existing Traffic Flows.** PG&E will develop a project-specific Transportation Management Plan (TMP), […]	Verify implementation of	During construction	

Table 2: Construction Mitigation Measures				
D/F[2]	**APM**	**Implementation**	**Schedule**	**Status**
		Transportation Management Plan.		
F	**APM TT-2. Lift Plan Development and Implementation.** A Lift Plan will be prepared and approved by the FAA prior to all construction helicopter operations and will not result in a change in air traffic patterns either temporarily or permanently. […]In the unlikely event that final construction plans and the Lift Plan require otherwise, PG&E will coordinate with potentially affected residents (providing a minimum of 30 days notice) to minimize the duration of the necessary work and any resultant inconvenience.	Verify implementation of Lift Plan.	During construction	
D	**APM TT-3. Emergency Route Access.** PG&E will coordinate with local emergency personnel in the event that project activities may impact an access point or route during an emergency. All construction activities will be coordinated with local law enforcement and fire protection services and the project will not result in inadequate emergency access.	Verify that coordination with local emergency personnel occurs as required.	During construction impact to emergency access routes	