Cabrillo-Santa Ynez 115 kV Reconductoring Project

Mitigation Monitoring, Compliance, and Reporting Program

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Chapter 1: Introduction

The Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Cabrillo-Santa Ynez 115 kV Reconductoring Project, as adopted by the California Public Utilities Commission (CPUC) on May 6, 2010, includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with mitigation measures approved in the Final IS/MND. 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. This MMCRP includes the information provided in Chapter 4, as well as specific protocols to be followed prior to and during construction by CPUC third-party environmental monitors (CPUC EMs) and Pacific Gas & Electric (PG&E) project staff. RMT Inc. (RMT) will be providing CPUC's EMs.

The project's MMCRP includes direct participation and commitment from PG&E and CPUC EMs. The success of the program depends on the project management staff, monitors, and construction contractor personnel. The goal of the MMCRP is to provide a clear understanding of the project's organization, established lines of communication, and documentation and report compliance measures with all of the mitigation measures.

The MMCRP was developed to provide guidelines and standardize procedures for environmental compliance on the project. The procedures have been developed in coordination with PG&E, CPUC, and RMT to help define the reporting relationships, provide detailed information about the roles and responsibilities of the project's environmental compliance team members, define compliance reporting procedures, and to establish a communication protocol.

1.1 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 the MMCRP as a working 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.

1.2 Program Adoption Process

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 May 6, 2010, (10-05-006). A draft version of the MMP was distributed to PG&E, CPUC, and RMT for review and comment.

1.3 Project Description

1.3.1 PROJECT OVERVIEW

The 14.6-mile Cabrillo-Santa Ynez 115 kV power line connects Cabrillo Substation to Santa Ynez Switching Station, and comprises one segment of an approximately 80-mile 115 kV transmission loop for the Lompoc-Santa Ynez areas. This loop serves over 71,000 customers in the general area between Santa Maria, Lompoc, Santa Ynez, and Solvang.

This project would require the following to reduce instances of line failure:

- Replacing the existing single-circuit 4/0 AAC with a 715 Multi-Chip Model (MCM), non-specular AAC on approximately 14.1 miles of an existing 14.6-mile power line
- Replacing approximately 125 existing wood poles (currently holding the 4/0 AAC) with new light-duty steel poles along the power line route

The existing segment of the power line between Cabrillo Substation and Santa Ynez Switching Station was upgraded from 70 kV to 115 kV with distribution-style dead-end shoes in 1988. The upgrade cost-effectively provided strength to meet tensioning requirements for this line. Subsequent investigation has determined this style of distribution design causes excessive bending of the conductor. The sharp bends, when exposed to the frequent local winds, create cyclic fatigue in the conductor, and resulting in increased failures.

The coastal climate produces foggy and windy conditions throughout the year, which have contributed to the accelerated deterioration of the existing conductors and associated hardware, causing frequent failures. The project would replace aging wood poles with new light-duty steel poles, and outdated or deteriorated hardware with an upgraded conductor (a heavier 715 MCM AAC), new insulators, and other required hardware along 14.1 miles of the existing power line. The remainder of the 80-mile power line extending into Cabrillo Substation does not require reconductoring because it currently uses the new MCM AAC. Average distances between poles (i.e., spans) are anticipated to vary between 350 and 780 feet, with a maximum span length between two poles of less than 1,500 feet.

Conductors and Other Hardware

The existing bare aluminum conductor would be replaced with a new 715 aluminum, non-specular conductor. Insulators along the entire 14.6-mile line would also be replaced during construction. The approximate distance from the ground to the lowest conductor would follow G.O. 95 requirements. All existing communication lines and 12 kV distribution underbuilds that are collocated with the existing conductor would be moved to the new poles.

Schedule

The project is estimated to begin construction in June 2010 and last approximately 15 months, with a completion date of August 2011. The Cabrillo-Santa Ynez 115 kV power line would not be removed from service during the summer because of high seasonal demands. The majority of pole installation, line reconductoring, and pole removal is expected to be performed throughout the year with the majority of activities occurring outside the summer months of June, July, and August. Reconductoring would begin when new poles have been installed along an approximately 1-mile distance (i.e., approximate length of new conductor reel).The proposed schedule is presented in Table 1.3-1.

1.3.2 CONSTRUCTION COMPONENTS

Components of the proposed project are described in detail below. Segment maps illustrating the locations of these components are found in *Appendix* A.

Power Line

The existing line is a 115 kV, single-circuit, 14.6 mile long power line. The proposed reconductoring on approximately 14.1 miles of this line would not change the line capacity or length. Other lines, equipment, and utilities, such as communications lines that are collocated on the existing poles, would be transferred to the new poles.

Poles

The project includes replacing 125 wood poles along the route with new direct-buried, light-duty steel poles designed to meet General Order 95 (G.O. 95) clearance requirements for the new 715 MCM AAC. Direct-buried poles would not require the installation of foundations. New steel poles

Table 1.3-1: Proposed Construction Schedule

Project Activity	Proposed Schedule
Final engineering completed	October 2009
Begin acquiring temporary construction easements	December 2009
Permit To Construct decision adopted and effective	May 6, 2010
Acquire required permits	June 2010
ROW and property acquisition	Not anticipated; if needed, March 2010
Construction begins: access road re-establishment and pole installation	June 2010
Pole installation, reconductoring (as pole installation and line clearances permit), and pole removal	July 2010 through August 2011, as schedule constraints allow
Project operational	August 2011
Cleanup	September 2011

would have a surface treatment designed to mimic the appearance of natural weathering similar to that of the current wood poles. Steel poles also would provide superior protection from wildfires, rotting, and woodpecker damage compared to the existing wood poles. The new poles would be installed consistent with PG&E standard raptor-safe design criteria, which provide 8.5 feet of clearance between conductors and lower voltage lines located underneath the transmission line (i.e., underbuild). Triangular raptor perch deterrents would be installed per PG&E guidelines in areas supporting 12 kV underbuilds. Eight existing wood poles along the route (Poles 1 through 6, 11, and 17) would not be replaced with new steel poles. These poles were recently replaced during routine or emergency maintenance and are in good condition. Insulator replacement and reconductoring activities would still be performed in these areas.

The new poles are designed to accommodate sway associated with the new conductor and suspension-style insulators. The new poles would be buried deeper (11 to 13.5 feet) than existing poles (7 to 10 feet). Aboveground pole heights would not change significantly, ranging from 49 to 64 feet, except at two locations (i.e., at the SR 246 crossing and in the proximity of a residential development on the east end of the power line), where poles would be 5 to 12 feet taller than existing poles to provide adequate ground clearance and reduce electromagnetic fields (EMF) near residences. Average distances between poles (i.e., spans) are anticipated to vary between 350 and 780 feet, with a maximum span length between two poles of less than 1,500 feet.

Conductors and Other Hardware

The existing bare aluminum conductor (4/0 AAC, seven strand, 0.52 inch in diameter) would be replaced with a new 715 aluminum, non-specular conductor (715 MCM AAC, 0.97 inch in diameter).

To optimize the efficiency of operation and maintenance activities, insulators along the entire 14.6-mile line would also be replaced during construction, creating a consistent age for hardware along the power line. All existing communication lines and 12 kV distribution underbuilds that are collocated with the existing conductor would be moved to the new poles.

The approximate distance from the ground to the lowest conductor would follow G.O. 95 requirements:

- Thoroughfares traversed by vehicles: 30 feet minimum
- Water crossings less than 20 acres: 27 feet minimum
- Highway crossings (e.g., SR 246): 30 feet minimum

1.3.3 PROJECT DOCUMENTS

The MMCRP is intended to provide pertinent information necessary to successfully implement the MMP during construction. The mitigation measures and Applicant Proposed Measures (APM) listed in *Section 4.3* are presented in Chapter 4 of the Final IS/MND. Detailed discussions on the actions required for each mitigation measure and APM are provided in these sections as well. In addition to the Final IS/MND, construction activities must be conducted in accordance with the requirements stipulated in the following documents:

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

1.4 Agency Jurisdiction

In addition to the CPUC, several local, state, and federal agencies have jurisdiction over lands 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, jurisdictional agencies may visit the project site from time to time and request information regarding the status of a mitigation measure. In addition, PG&E is required to submit survey results to the US Fish and Wildlife Service and the California Department of Fish and Game, and consult with these agencies when project changes affect the condition of their 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 2.3 below. Table 1.4-1 lists jurisdictional agencies, purpose of consultation, and required permits associated with the project:

Table 1.4-1: Permits and Approvals Necessary for the Proposed Project

Permit, Approval, or Exemption	Purpose	Regulating Agency
Federal		
Section 7 Consultation: Incidental Take Permit	Endangered Species Act compliance	U.S. Fish and Wildlife Service
Clean Water Act 404 Nationwide Permit	Discharge of dredged and fill material into waters of the United States	U.S. Army Corps of Engineers
State		
Consistency Determination	Compliance with Section 2080.1 of the California Endangered Species Act	California Department of Fish and Game

Table 1.4-1 *(Continued)*: Permits and Approvals Necessary for the Proposed Project

Permit, Approval, or Exemption	Purpose	Regulating Agency
State		
Storm Water Pollution Prevention Plan; enrollment under General Construction National Pollution Discharge Elimination System permit	Road grading and ground disturbance for pole installation	Central Coast Regional Water Quality Control Board
Section 401 certification	Discharge of dredged and fill material into waters of the United States.	Central Coast Regional Water Quality Control Board
Encroachment Permits	For any work to take place within ROW for US 101, SR 1, and SR 246	California Department of Transportation
Local		
Traffic Control Permit	Required for any work within the ROW for County roadways	Santa Barbara County Department of Public Works

Chapter 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.

2.1 Organization Overview

2.1.1 PG&E PROJECT CONSTRUCTION MANAGER

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

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

2.1.2 PG&E CONSTRUCTION MANAGEMENT

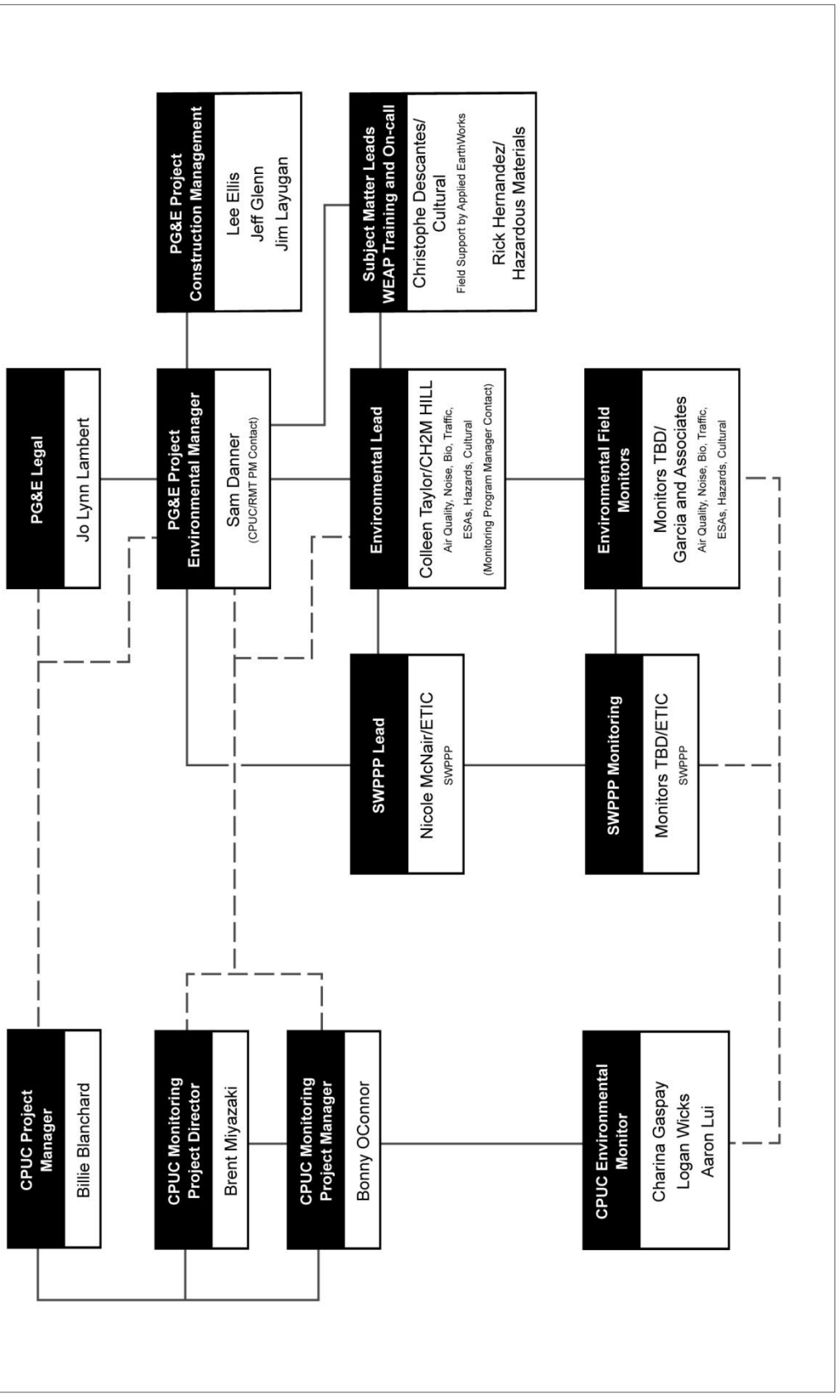
The Construction Management (TBD) provides support to the Project Construction Manager and oversees activities of construction staff. The Construction Management will be based out of PG&E's Templeton Service Center, 160 Cow Meadow Place, Templeton , but will also typically be available in the field on a daily basis. Specific responsibilities of the Construction Management include, but are not limited to:

- Ensure compliance with company specifications, permit conditions, construction contracts, and applicable codes;
- Notify Environmental Monitors of project and schedule changes;
- Work with Environmental Monitors to evaluate and improve the implementation of the MMCRP, as construction progresses; and
- Regularly facilitate project field meetings.

2.1.3 PG&E PROJECT ENVIRONMENTAL MANAGER

PG&E's Project Environmental Manager (Sam Danner) is responsible for providing the appropriate level of resources for successful implementation of the MMCRP. The Project Environmental Manager is responsible for directing development and implementation of preconstruction environmental planning, permitting and compliance activities, environmental

Figure 2.1-1: Project Management Organization Chart



SOURCE: RMT Inc. 2010

inspection program, and environmental training. The Project Environmental Manager is also responsible for ensuring compliance with the Section 7 Consultation and 2080.1 Consistency Determination. The Project Environmental Manager will be based out of PG&E's San Luis Obispo Service Center.

2.1.4 CPUC PROJECT MANAGER

The CPUC Project Manager 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, and will oversee their work through review of daily and weekly status reports. The CPUC Project Manager will be notified of noncompliance situations and may suggest measures to help resolve the issue(s). All variance requests will be submitted to the CPUC Project Manager for review and approval.

2.1.5 CPUC THIRD-PARTY MONITORS

The CPUC will delegate daily monitoring and reporting responsibilities to a third-party monitoring program. The number of third-party 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 Monitoring Project Director (CPUC Monitoring PD) and Project Manager (CPUC Monitoring PM) who will oversee the day-to-day monitoring activities of the EMs, as well as determine the appropriate level of inspection frequency. The overall monitoring program will be administered under the direction and oversight of the CPUC Project Manager. 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 weekly reports and use of a mitigation measure tracking table.

2.1.6 PG&E ENVIRONMENTAL MONITORS

The PG&E monitoring team will include a Environmental Lead who will coordinate the activities of the lead, biological, paleontological, cultural, and hazardous materials monitors, as needed, to comply with each mitigation measure. PG&E Environmental Monitors will work closely with construction personnel to ensure pre-construction surveys are completed and mitigation measures are implemented correctly. PG&E Environmental Monitors 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.

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 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 and Contractor(s) staff include, but are not limited to:

- Verify that all construction workers attend the project's environmental training program prior to beginning work on the ROW;
- Review and understand the environmental requirements;
- Implement environmental protection requirements and conditions during construction;

- Maintain compliance with project requirements; and
- Respond to PG&E Environmental Monitor's requests during construction.

2.1.8 MITIGATION MONITORING PROGRAM CONTACT LIST

A project contact list is included as *Appendix B*. This contact list includes the names of 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. As stated above, the CPUC has delegated monitoring responsibilities to a third-party monitoring program. 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 a site visit during construction.

Several mitigation measures require a qualified specialty monitor during construction. The mitigation measures presented in Table 2.2-1 require that PG&E provides an on-site monitor.

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

2.2.2 ENFORCEMENT

The CPUC is responsible for enforcing the procedures adopted for monitoring through the CPUC EMs assigned to each segment. The CPUC EMs shall note problems with monitoring, notify designated project members, and report the problems to the CPUC Monitoring PM and PD, who will then report problems to the CPUC Project Manager. The CPUC has the authority to stop or redirect any construction activity associated with the Cabrillo-Santa Ynez 115 kV Reconductoring Project, 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). The CPUC has assigned this authority to the CPUC EMs in the field.

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 Bio-2	Sensitive Biological Resources	Biological	All, daily or as required in permits
MM Bio-5	Sensitive Plant Species	Biological	All, marking populations prior to construction
MM Bio-6	Sensitive Amphibian species	Biological	Pull Site P4, P9, P10, P12, and P15; Poles 11, 31, 33, 34, 48, 49, 68, 69, 70, 71, 72, 81, 82, 85, 86, 89, 90, 91, 112, 113, 114, and 115 68, 69, 70, 71, 114, 115, or as otherwise required in permits
MM Bio-9	Sensitive Avian Species	Biological	Pull Site P1; Poles 4, 5, and 6
MM Bio-10	Active Burrowing Owl Nests	Biological	As needed where identified
MM Bio-12	Active Migratory Bird or Raptor Nest	Biological	As needed where identified

2.2.3 MITIGATION COMPLIANCE

PG&E is responsible for successfully implementing all 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 entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the permit process.

PG&E shall inform the CPUC and its monitors, in writing, of any mitigation measures that are not or cannot be successfully implemented. The CPUC, in coordination with its monitors, will assess whether alternative mitigation is appropriate, and determine with PG&E the subsequent actions required. If the measures are agency permit requirements, then the agency issuing the permit may 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. Section 2.3 of this MMCRP provides a communication protocol to accurately disseminate information pertaining to on-going surveys and mitigation measures, construction activities, contractors, and planned or upcoming work to all levels of the project. *Appendix C* includes a communication protocol summary for use as quick reference, and to supplement information provided in *Section 2.3*.

2.3.1 PRE-CONSTRUCTION KICK-OFF MEETING

A pre-construction meeting was held on May 18, 2010 with the CPUC and PG&E team to review the MMCRP and 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 PROGRESS MEETINGS

PG&E may request CPUC's EM(s) to participate in regular field meetings to help resolve any issue that may have arisen during the previous period and anticipate 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, PG&E Construction Manager, PG&E EM, and the CPUC Monitoring PD and/or CPUC Project Manager may participate in a weekly teleconference call to discuss project status.

2.3.3 DAILY COMMUNICATION

Many of the issues that come up during construction can be resolved in the field through regular communication between CPUC EMs, PG&E, 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 depicted in *Section 2.0* generally 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 Lead Environmental Monitor. The CPUC EM will contact PG&E's Lead Environmental Monitor, if an activity is observed that conflicts with one or more of the mitigation measures, to correct the situation. If the CPUC EM cannot immediately reach PG&E's Lead Environmental Monitor**,** then the Environmental Lead or PG&E Project Environmental Manager will be contacted to address the problem. Similarly, the CPUC EM will contact PG&E's Lead Environmental Monitor for information on where construction crews are working, the status of mitigation measures, 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 stop or redirect an on-going activity, 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).

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 Lead**.** The weekly environmental compliance status report will also be a tool to keep all parties informed of construction progress and schedule changes.

2.3.4 COMMUNICATING COMPLIANCE ISSUES

Section 3.1.2 below describes procedures to communicate concerns, incidents, and non-compliances identified by the CPUC EMs during site inspections.

2.3.5 COORDINATION WITH OTHER AGENCIES

As discussed in *Section 1.4*, 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 regarding their jurisdiction. The CPUC Monitoring team may request copies of email correspondences, phone logs, or other documentation between PG&E and resource agencies to avoid direct involvement from CPUC Monitoring PD or PM. 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 PD or 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 PD or PM will coordinate with PG&E prior to making this call and provide PG&E with an opportunity to participate in the call.

2.3.6 DISPUTE RESOLUTION

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 at the field level informally between the CPUC EMs and PG&E's Environmental Monitors or Environmental Lead or at the regular progress meetings. Questions may be raised to the PG&E Project Environmental Manager and the Environmental Lead or PG&E Project Construction 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.

Chapter 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 plans and obtain approval of these documents. Copies of this documentation will be retained by the CPUC third-party monitors, 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 Section 4.3.

While these documents are being reviewed by the approving agencies, they are also reviewed by the CPUC. Compliance with all pre-construction mitigation measures and APMs presented 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.

The CPUC third-party monitors, 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, the CPUC third-party monitors 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 the CPUC third-party monitors will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

IMPORTANT: The CPUC will not authorize construction to begin until all 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 3.2.1.

3.1.2 NOTICE TO PROCEED PROCEDURES

The CPUC Project Manager and all IS/MND team reviewers will ensure that the Notice to Proceed (NTP) process is consistent with the adopted CEQA document. The NTP approval(s) shall document that pre-construction mitigation measure requirements, including applicable surveys and studies, and project permit requirements have been met. In consideration of linear or phased projects, 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 which 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 in such cases the NTP may be conditioned to define actions that will be undertaken and documented prior to construction or prior to energizing the line.

Therefore, 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 as a whole.

In general, 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 mitigation measures and Applicant Proposed Measures 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 compliance items cannot be met prior to issuance of the NTP, a request shall be submitted that outlines what submittals are outstanding, 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 submit 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 and 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 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 CDFG, USFWS, Corps, and/or CCRWQCB, 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; at a minimum, the EMs will verify with PG&E that access can be safely granted. Supplemental information provided by PG&E, 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. In addition, field inspection forms will be utilized in the field to document compliance of specific crews, construction activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate weekly status reports and update the status of mitigation measures listed in Section 4.3.

3.1.5 COMPLIANCE LEVELS

Observations of 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 a non-compliance event, should be noted and provided to PG&E. These observations or concerns could also include minor deviations from a permit condition or mitigation measure that do not affect the effectiveness of the mitigation measures. Examples could include a trash bin that needs emptying, substitution of a coir roll for a silt fence in the SWPPP measures that provides equivalent protection, 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. These are typically issues or concerns that are addressed and resolved at the field level.

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 noncompliance 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 waterbody or storm drain

The CPUC EM will immediately notify the designated PG&E representative of a noncompliance that requires immediate corrective action. A non-compliance memorandum will be sent to PG&E by the CPUC Project Manager that outlines the incident, lists actions required to bring the activity back into compliance, and provides a timeline for follow-up. 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 get the issue corrected. 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

Repeated incidents without addressing the issue may result in non-compliance.

3.2 Project Changes

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

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. No project variance will be approved by the CPUC if it creates new significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements 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 PD and PM for their review. The CPUC Monitoring PD and 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 from the CPUC EM or need additional information to process the variance. In some cases, a variance may also require approval by jurisdictional agencies. In general a variance request must include the 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 as *Appendix* D.

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 would 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. Anything required to be utilized for a period longer than 60 days will require a variance (see Section 3.2.1). PG&E must demonstrate that: the TEWS is located in a disturbed area with no sensitive resources or land uses onsite or adjacent to the proposed work space, PG&E has permission of the applicable landowner (e.g., municipality or private) to use the work space, and that 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, it must submit such a request to the CPUC Monitoring PD. The CPUC Monitoring PD 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 PD. .

Following is a list of the specific information that PG&E would be required to submit with its TEWS request:

- 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 as *Appendix* E.

3.3 Records Management

Any daily inspection and weekly status reports will be filed and used by the CPUC third-party monitor 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 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 on request.

Chapter 4: Mitigation Monitoring Program Table

4.1 Using the Table

The table in Appendix F lists the mitigation measures included in the Final IS/MND and the CPUC decision (10-05-006) dated May 6, 2010. The Mitigation Monitoring Program table is the core document for environmental requirements on the project, and is the primary guideline 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 preconstruction 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. Similarly, 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 which are not effectively mitigating impacts, at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in *Section 2.3.6.* 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

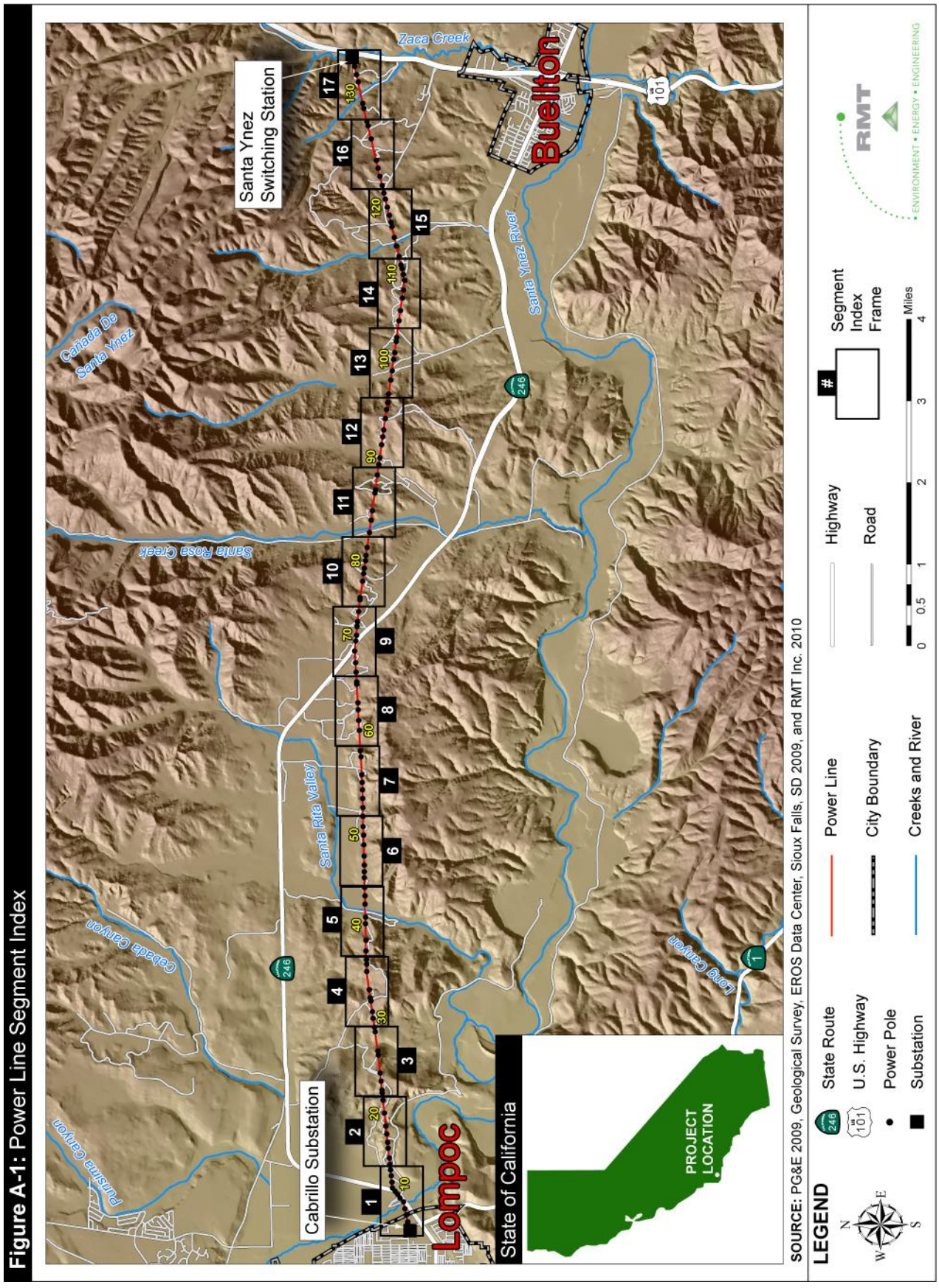
Figure A-1: Power Line Segment Index
Santa Ynez Switching Station
Buellton
Lompoc
Cabrillo Substation
Zaca Creek
Cañada De Santa Ynez
Santa Rosa Creek
Santa Rita Valley
Santa Ynez River
Cebada Canyon
Purisima Canyon
Long Canyon
State of California
PROJECT LOCATION
SOURCE: PG&E 2009, Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2010
LEGEND
State Route
U.S. Highway
Power Pole
Substation
Power Line
City Boundary
Creeks and River
Highway
Road
Segment Index Frame
Miles
0 0.5 1 2 3 4
RMT
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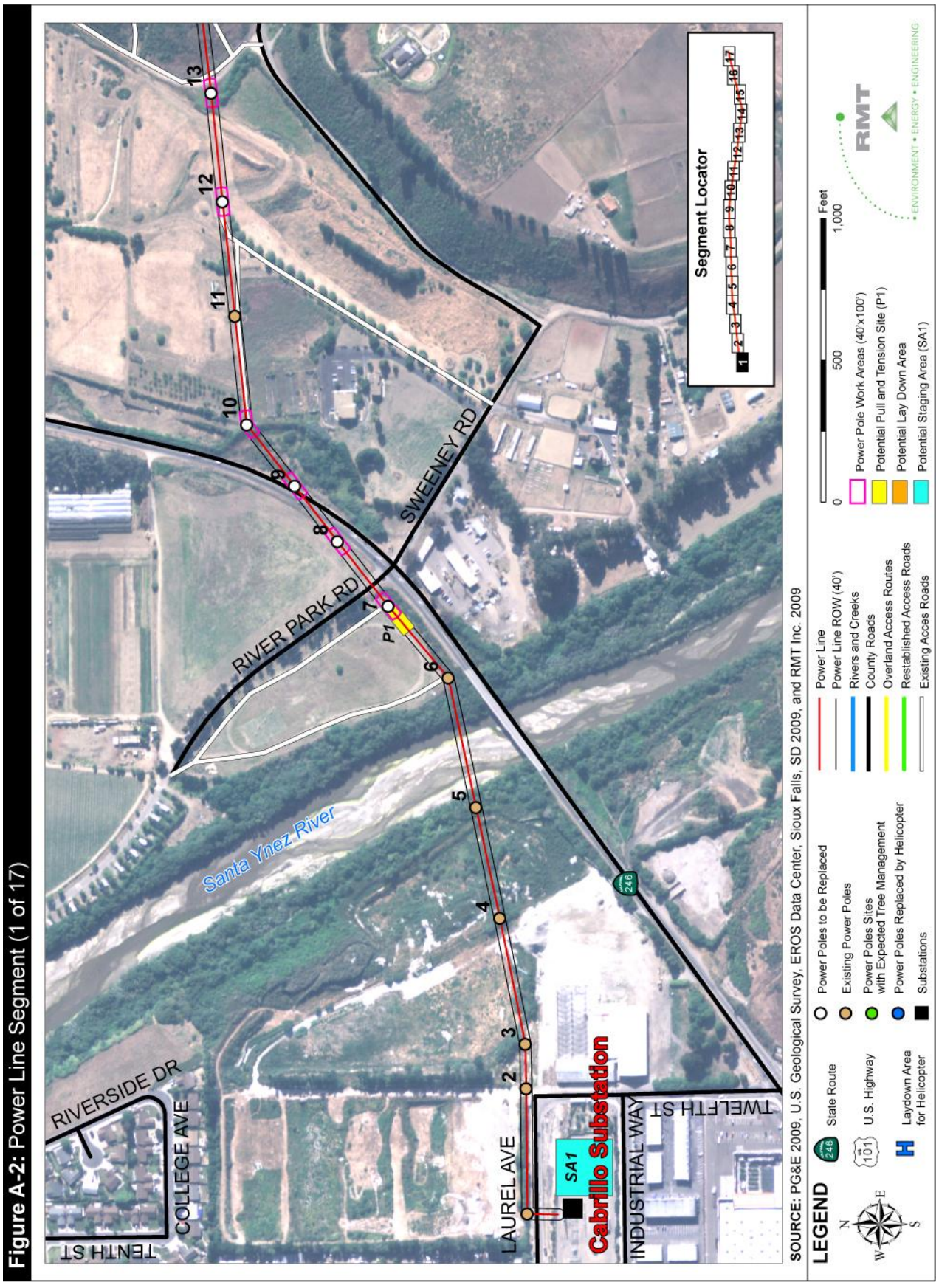
Figure A-2: Power Line Segment (1 of 17)
RIVERSIDE DR
COLLEGE AVE
TENTH ST
RIVER PARK RD
SWEENEY RD
LAUREL AVE
INDUSTRIAL WAY
TWELFTH ST
Santa Ynez River
Cabrillo Substation
SA1
P1
Segment Locator
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
Feet
0
500
1,000
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P1)
Potential Lay Down Area
Potential Staging Area (SA1)
RMT
ENVIRONMENT • ENERGY • ENGINEERING

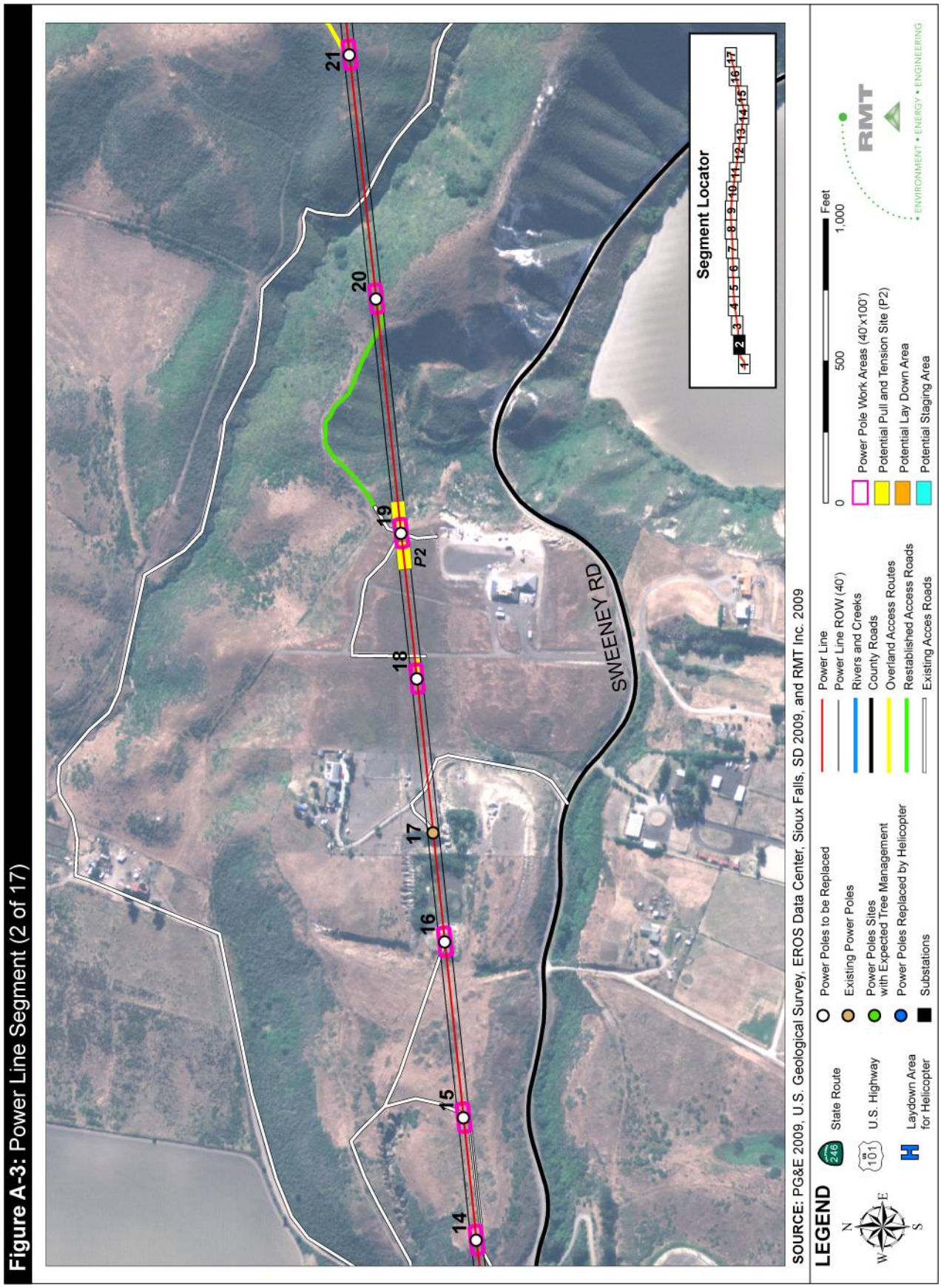
Figure A-3: Power Line Segment (2 of 17)
Segment Locator
SWEENEY RD
P2
14
15
16
17
18
19
20
21
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P2)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

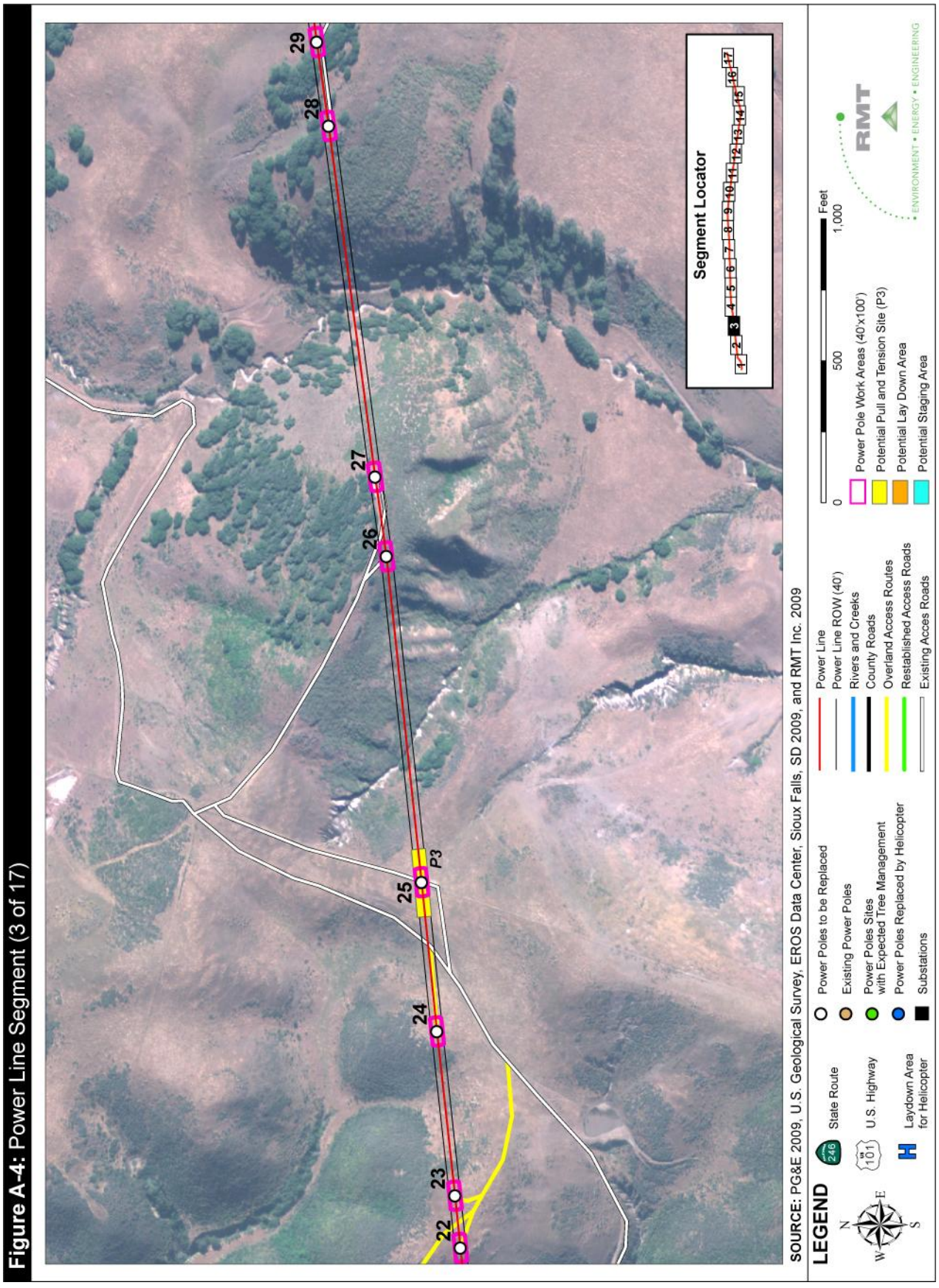
Figure A-4: Power Line Segment (3 of 17)
Segment Locator
22
23
24
25
26
27
28
29
P3
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P3)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

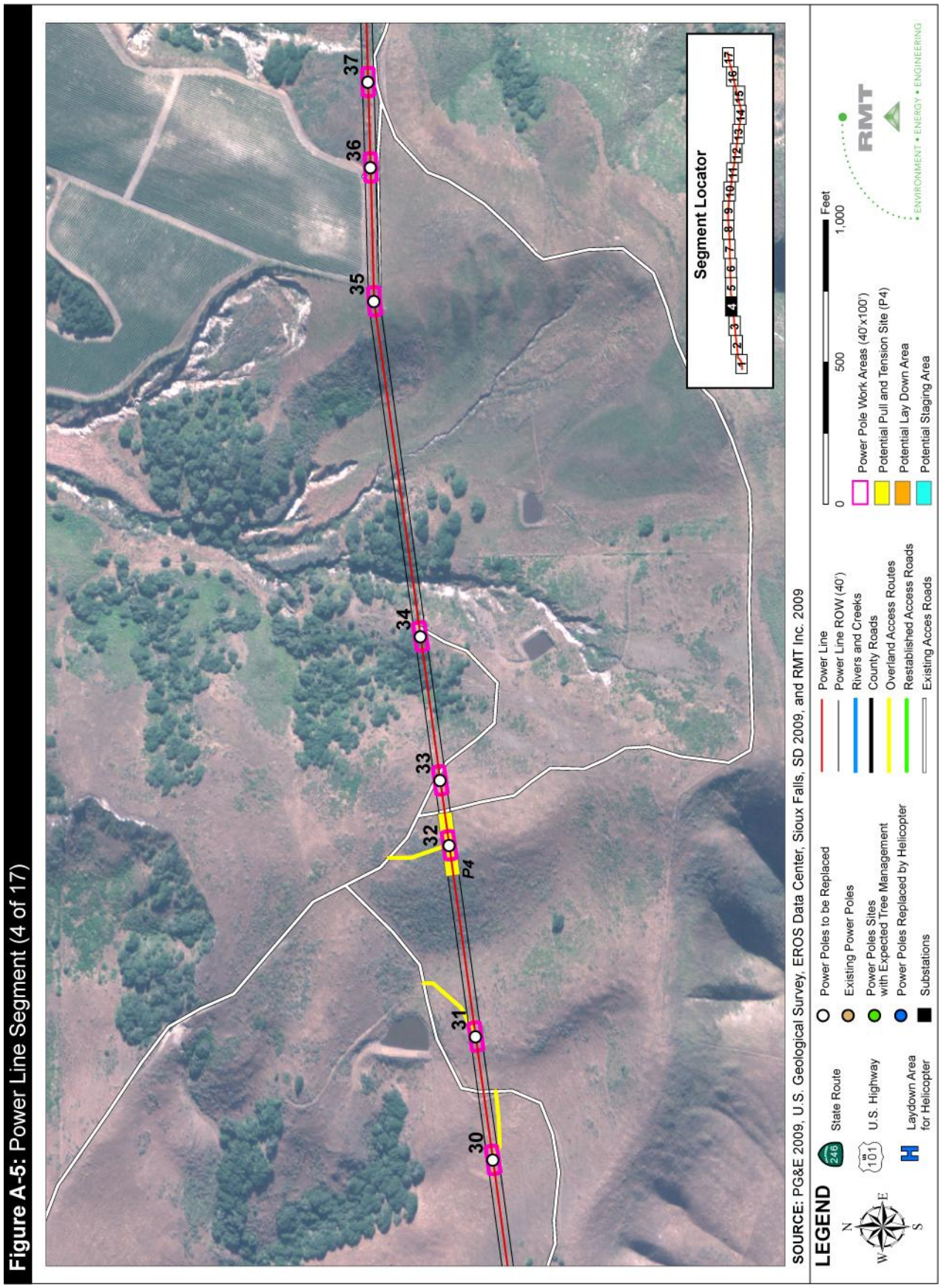
Figure A-5: Power Line Segment (4 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
30
31
32
33
34
35
36
37
P4
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P4)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

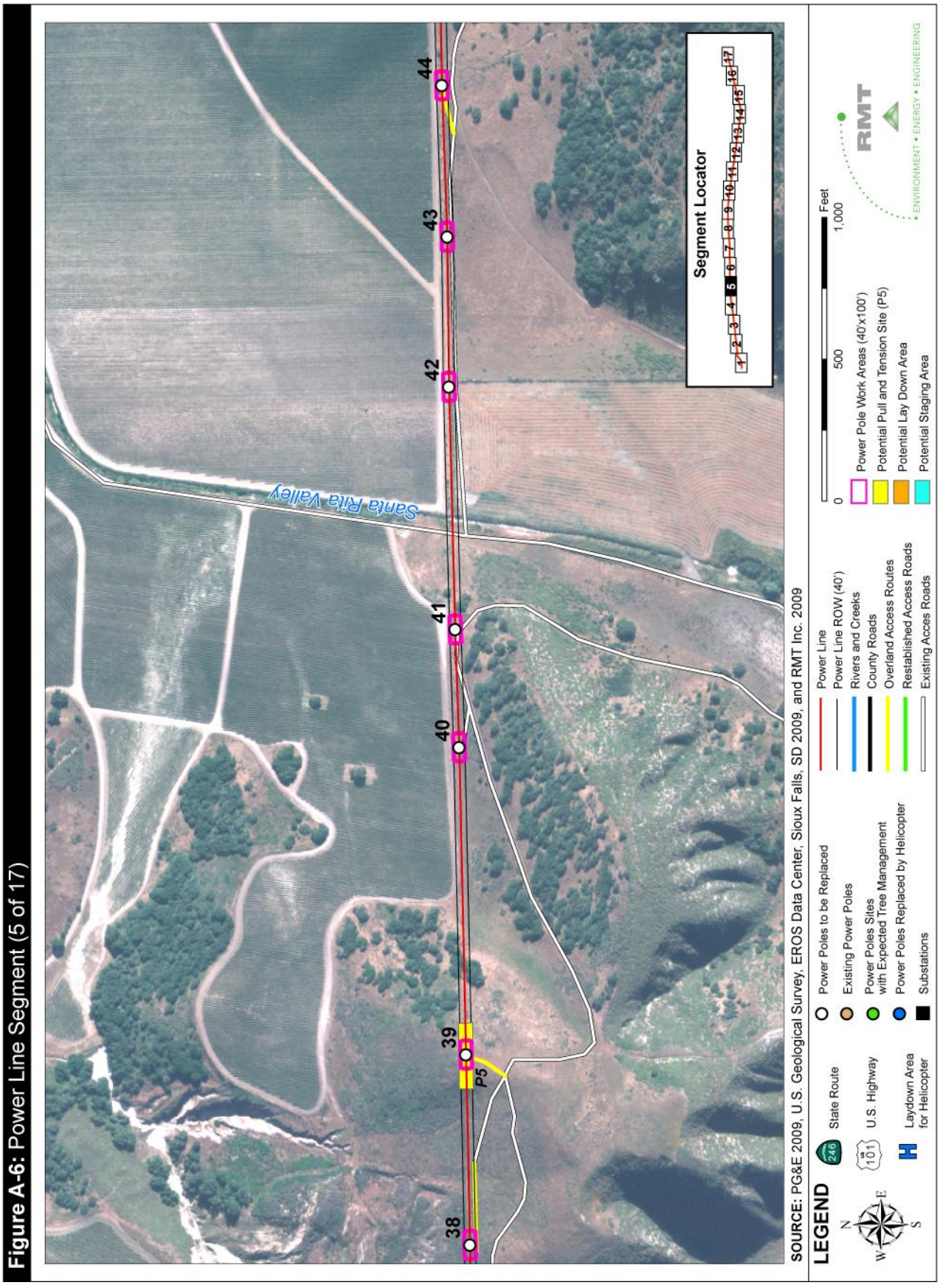
Figure A-6: Power Line Segment (5 of 17)
Santa Rita Valley
38
39
40
41
42
43
44
P5
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Reestablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P5)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

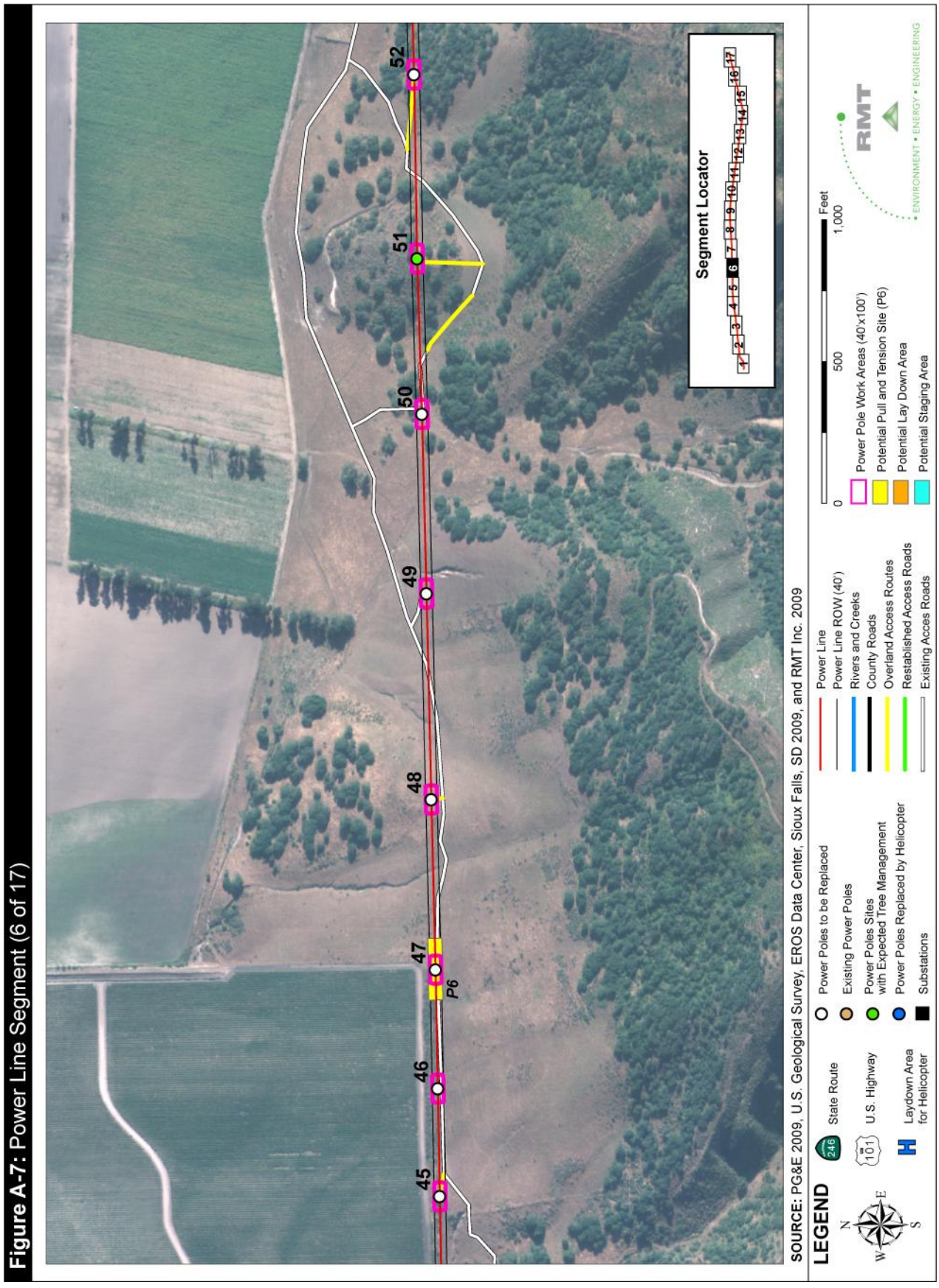
Figure A-7: Power Line Segment (6 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
45
46
47
48
49
50
51
52
P6
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
State Route
U.S. Highway
Laydown Area for Helicopter
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P6)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

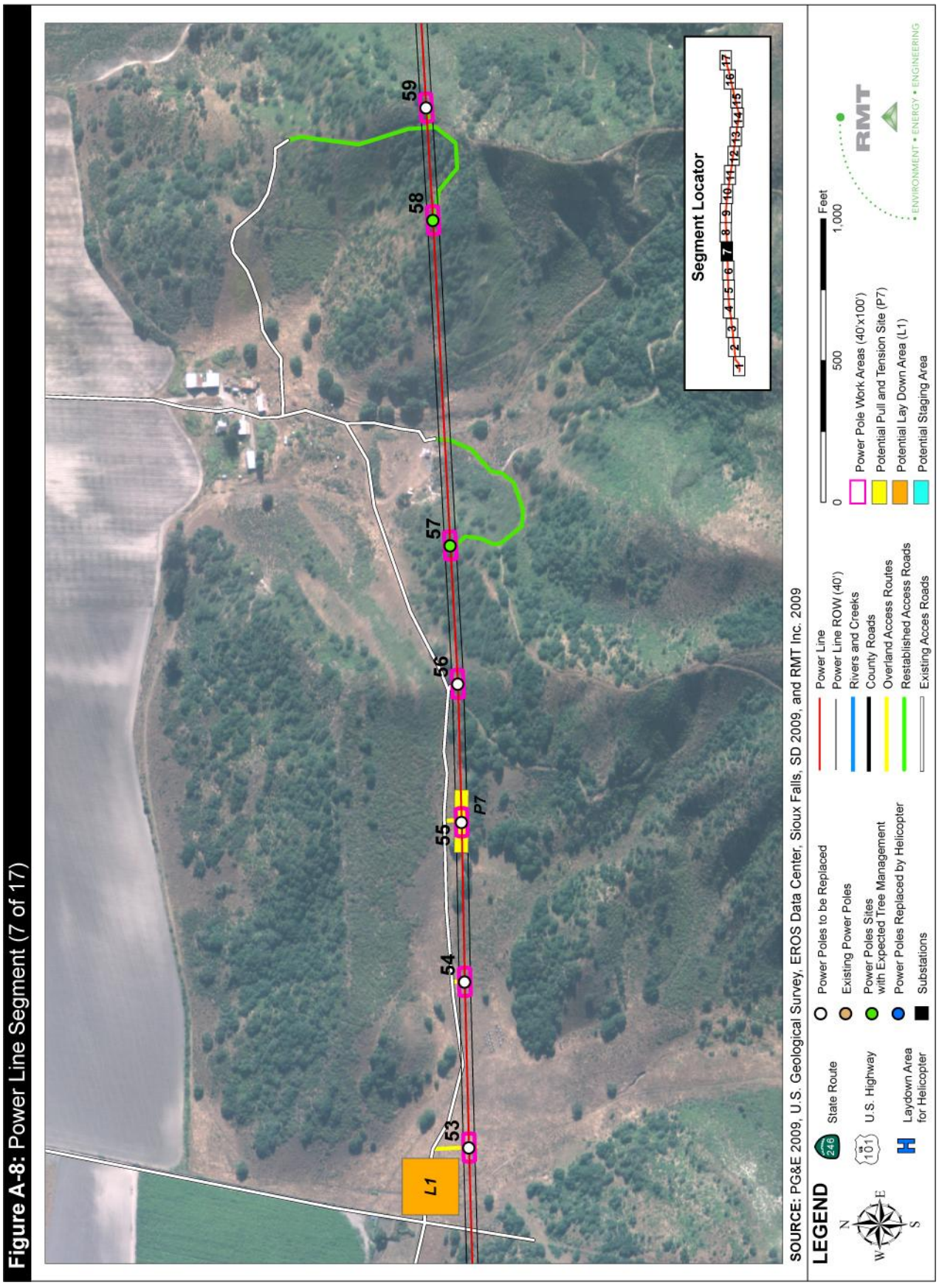
Figure A-8: Power Line Segment (7 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
53
54
55
56
57
58
59
L1
P7
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P7)
Potential Lay Down Area (L1)
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

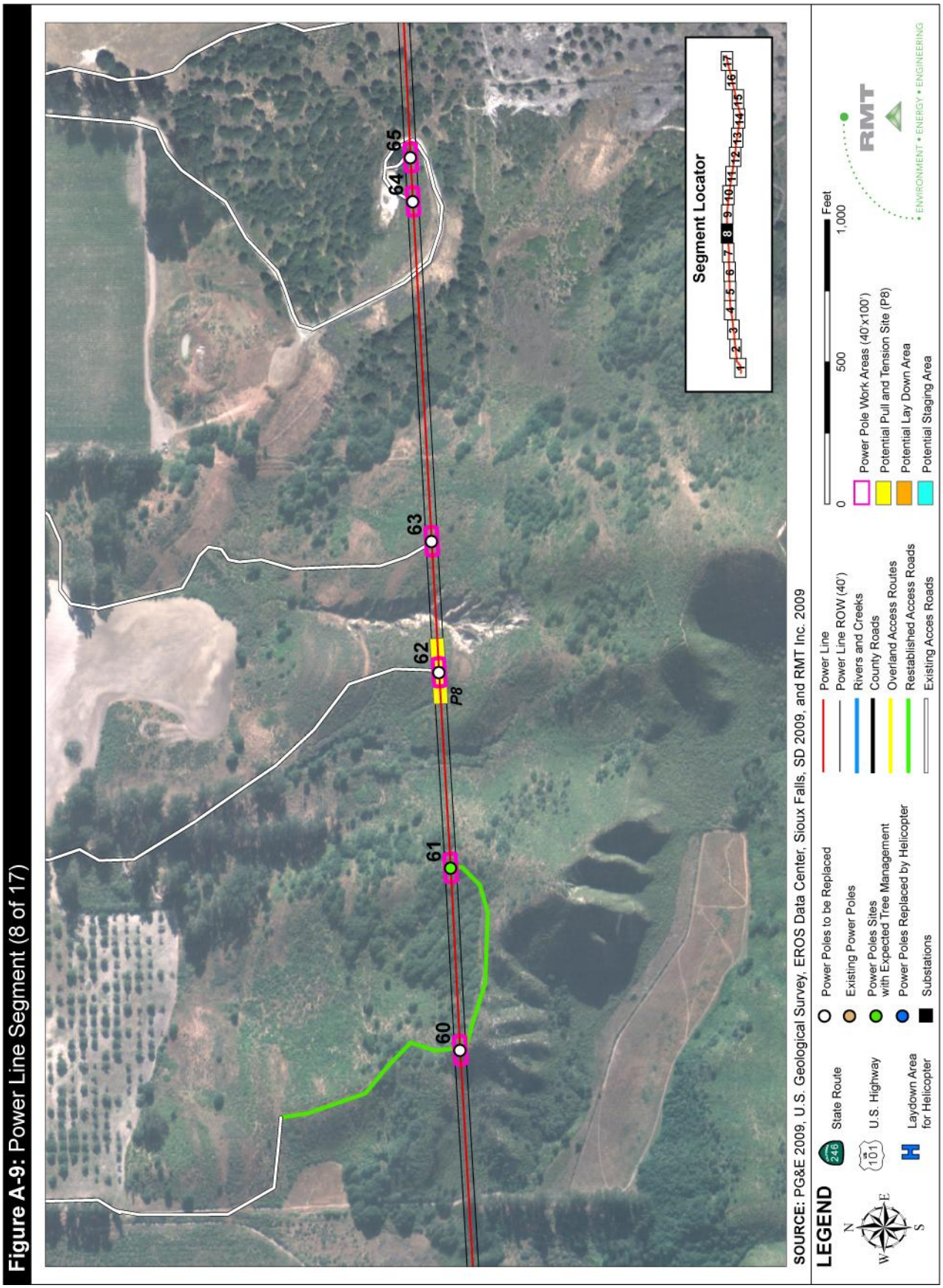
Figure A-9: Power Line Segment (8 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
60
61
62
63
64
65
P8
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P8)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

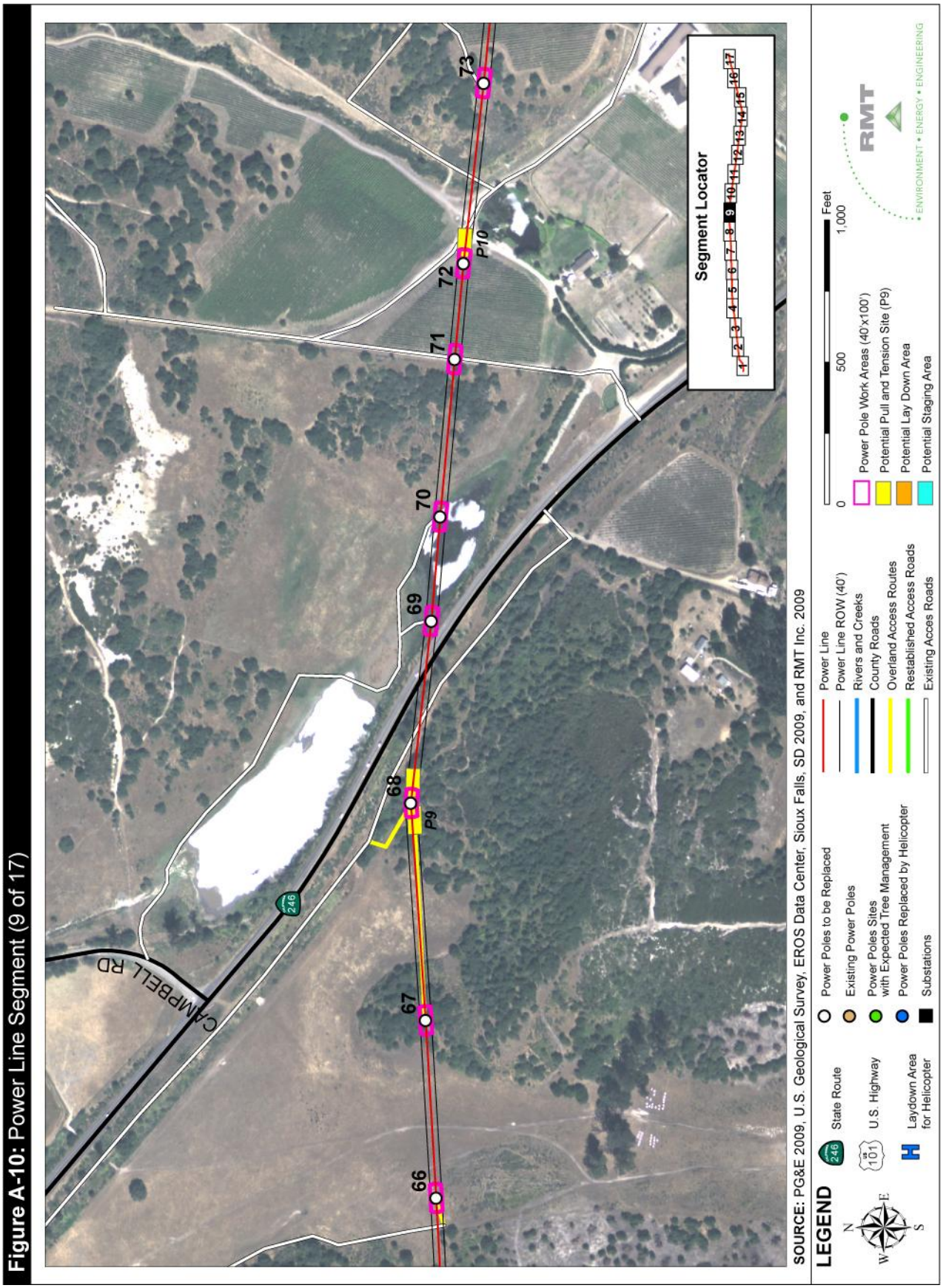
Figure A-10: Power Line Segment (9 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
CAMPBELL RD
246
66
67
68
69
70
71
72
73
P9
P10
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Reestablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P9)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

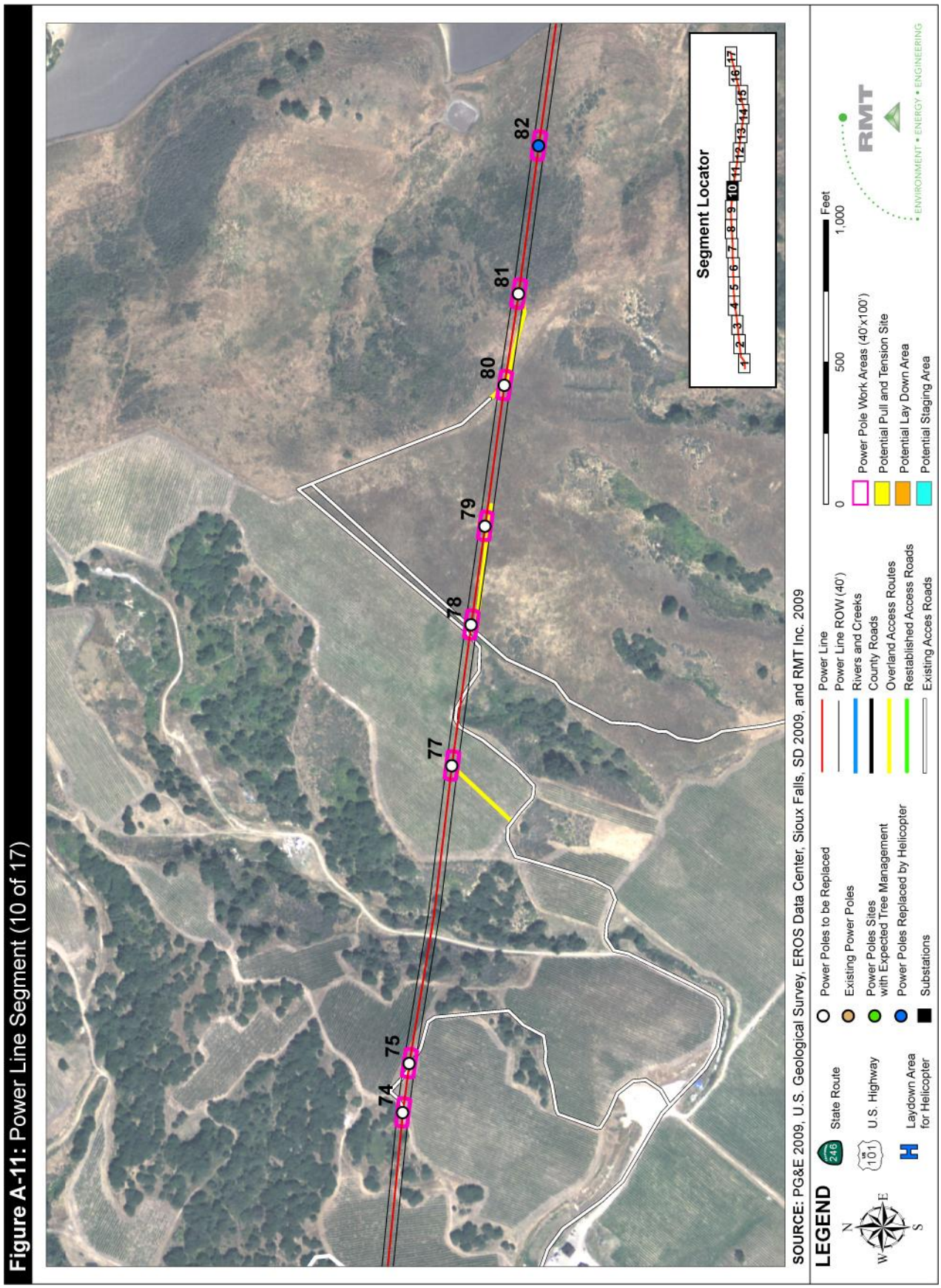
Figure A-11: Power Line Segment (10 of 17)
Segment Locator
74
75
77
78
79
80
81
82
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Reestablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

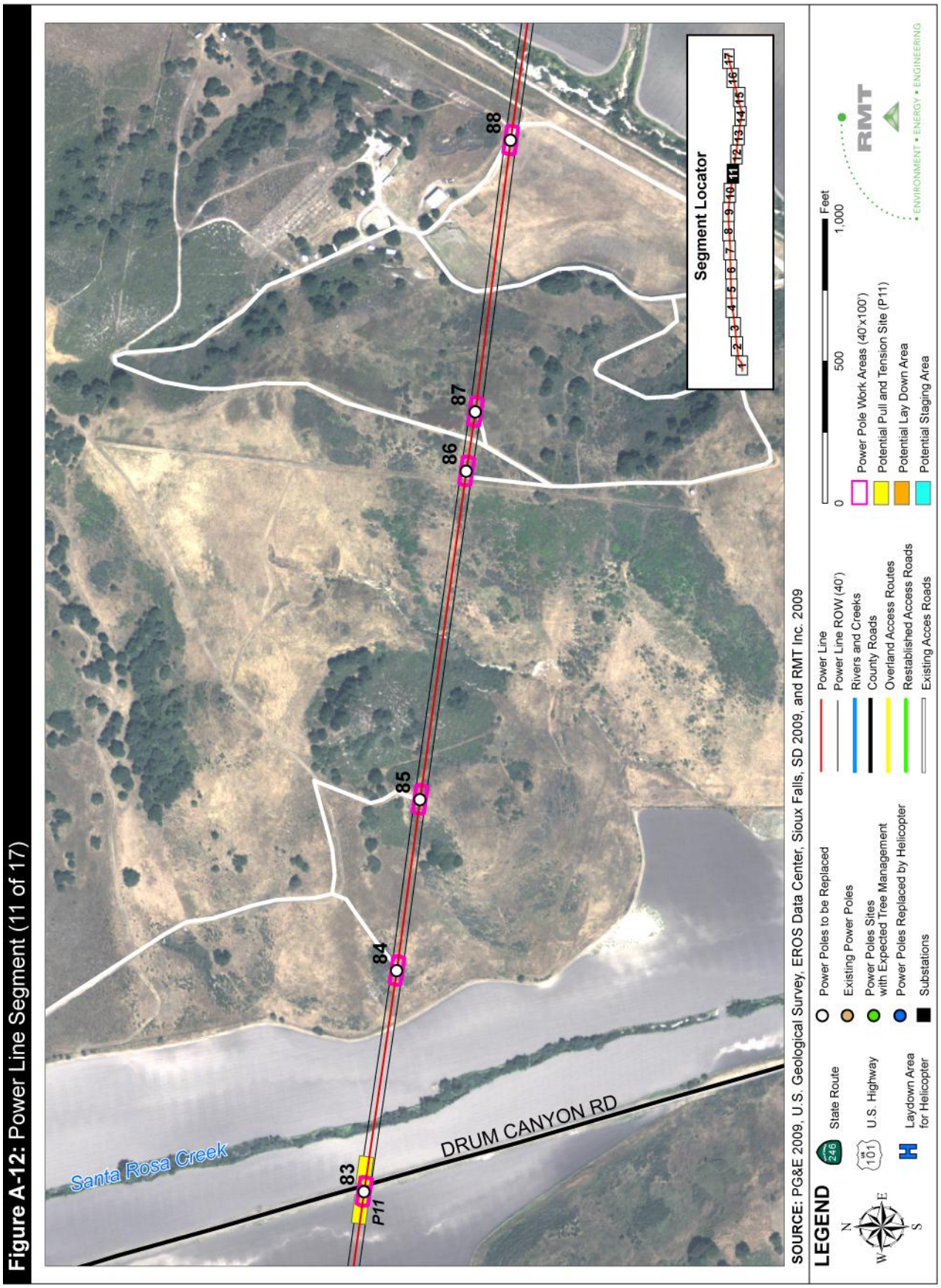
Figure A-12: Power Line Segment (11 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
83
84
85
86
87
88
P11
Santa Rosa Creek
DRUM CANYON RD
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P11)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

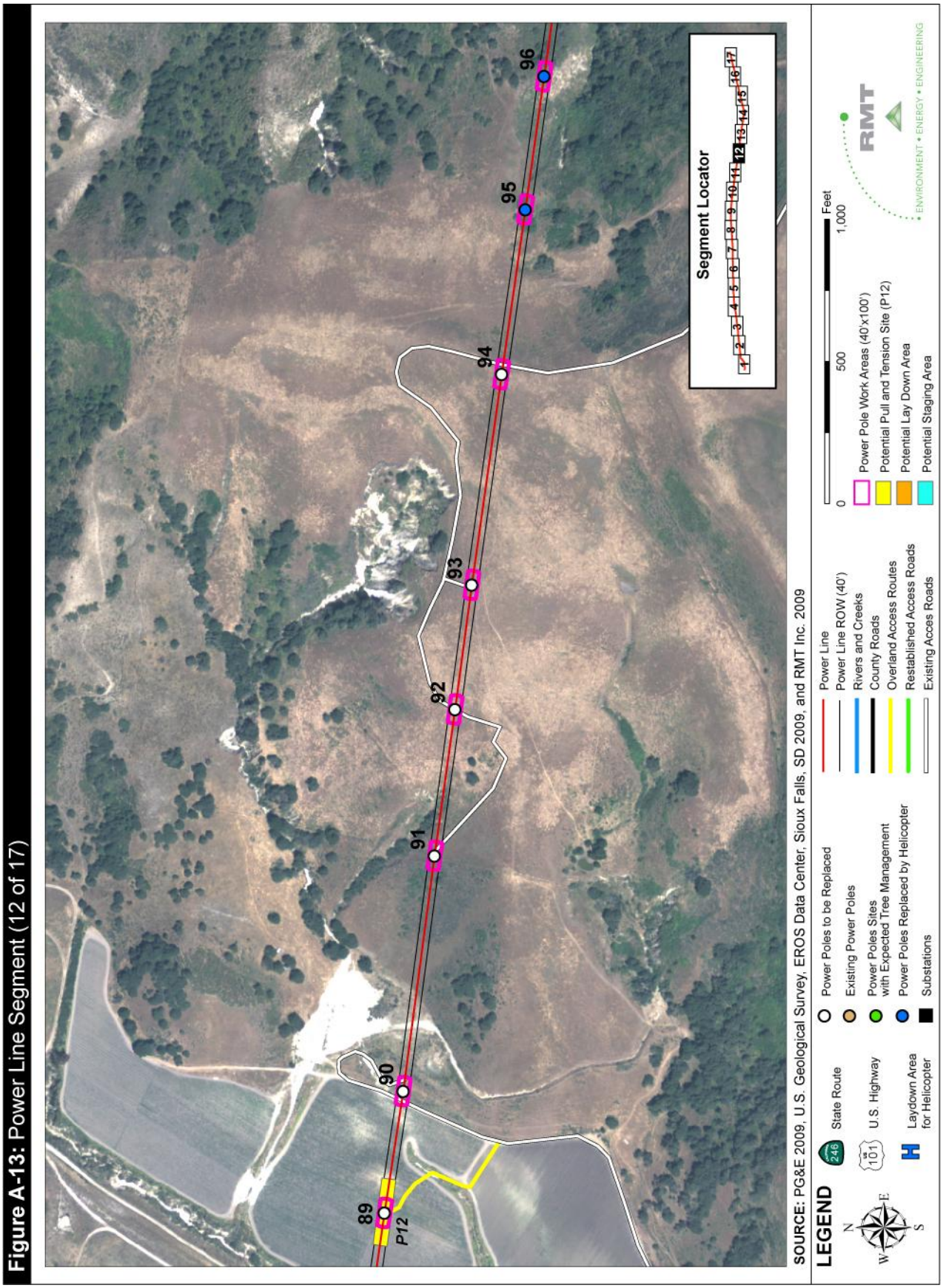
Figure A-13: Power Line Segment (12 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
89
P12
90
91
92
93
94
95
96
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P12)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

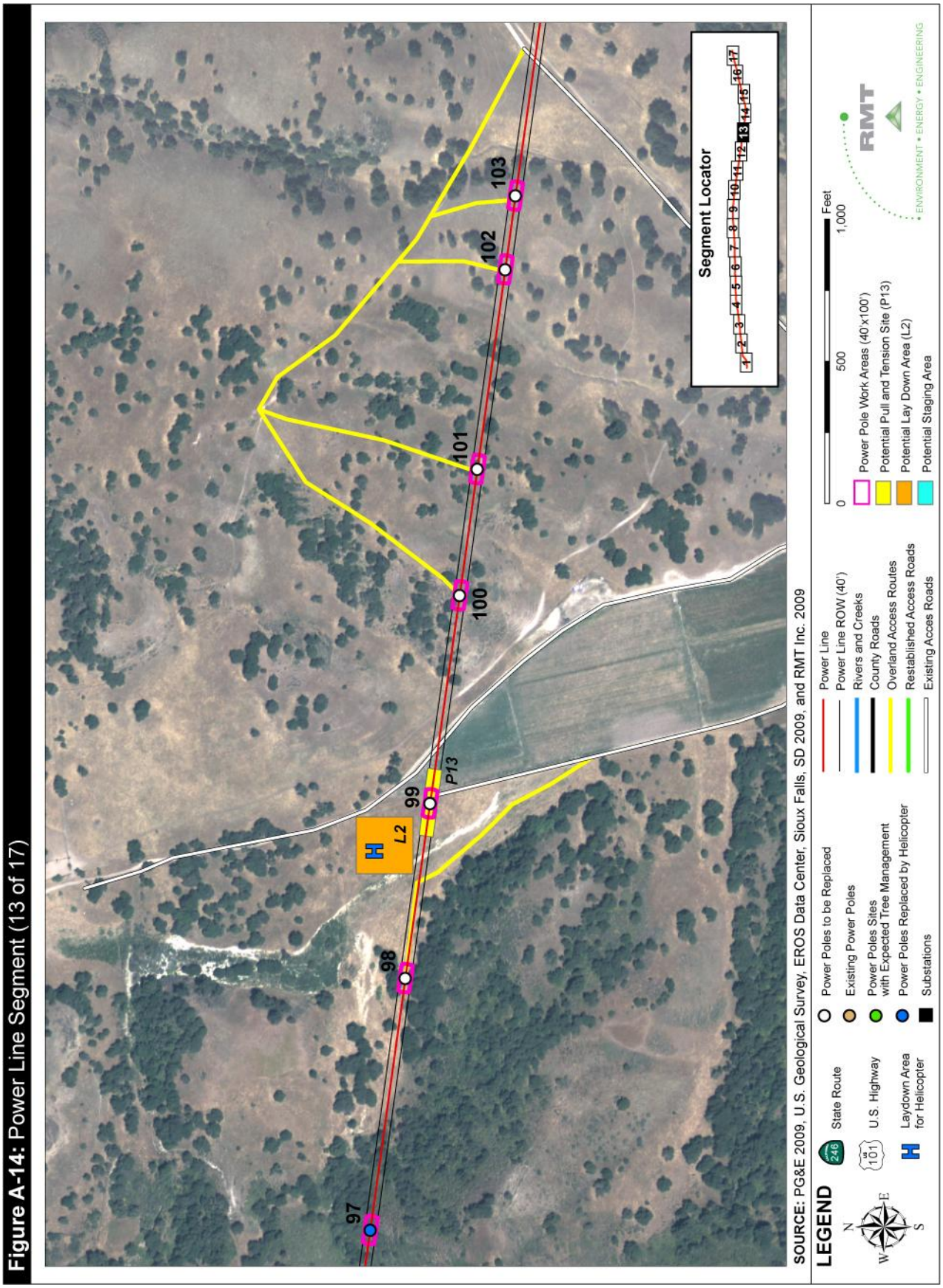
Figure A-14: Power Line Segment (13 of 17)
97
98
99
100
101
102
103
P13
L2
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route 246
U.S. Highway 101
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Reestablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P13)
Potential Lay Down Area (L2)
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

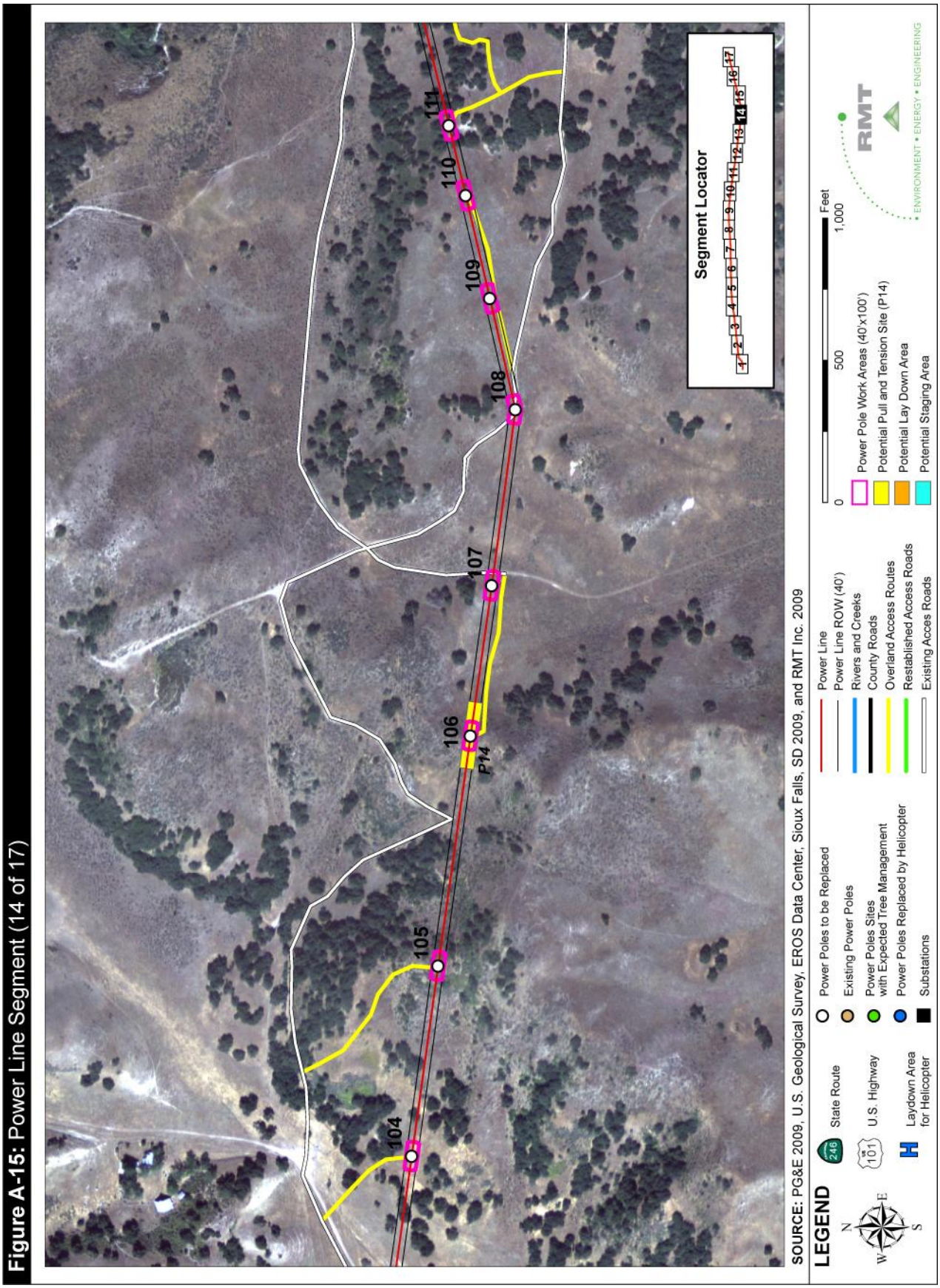
Figure A-15: Power Line Segment (14 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
104
105
106
P14
107
108
109
110
111
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Reestablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P14)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

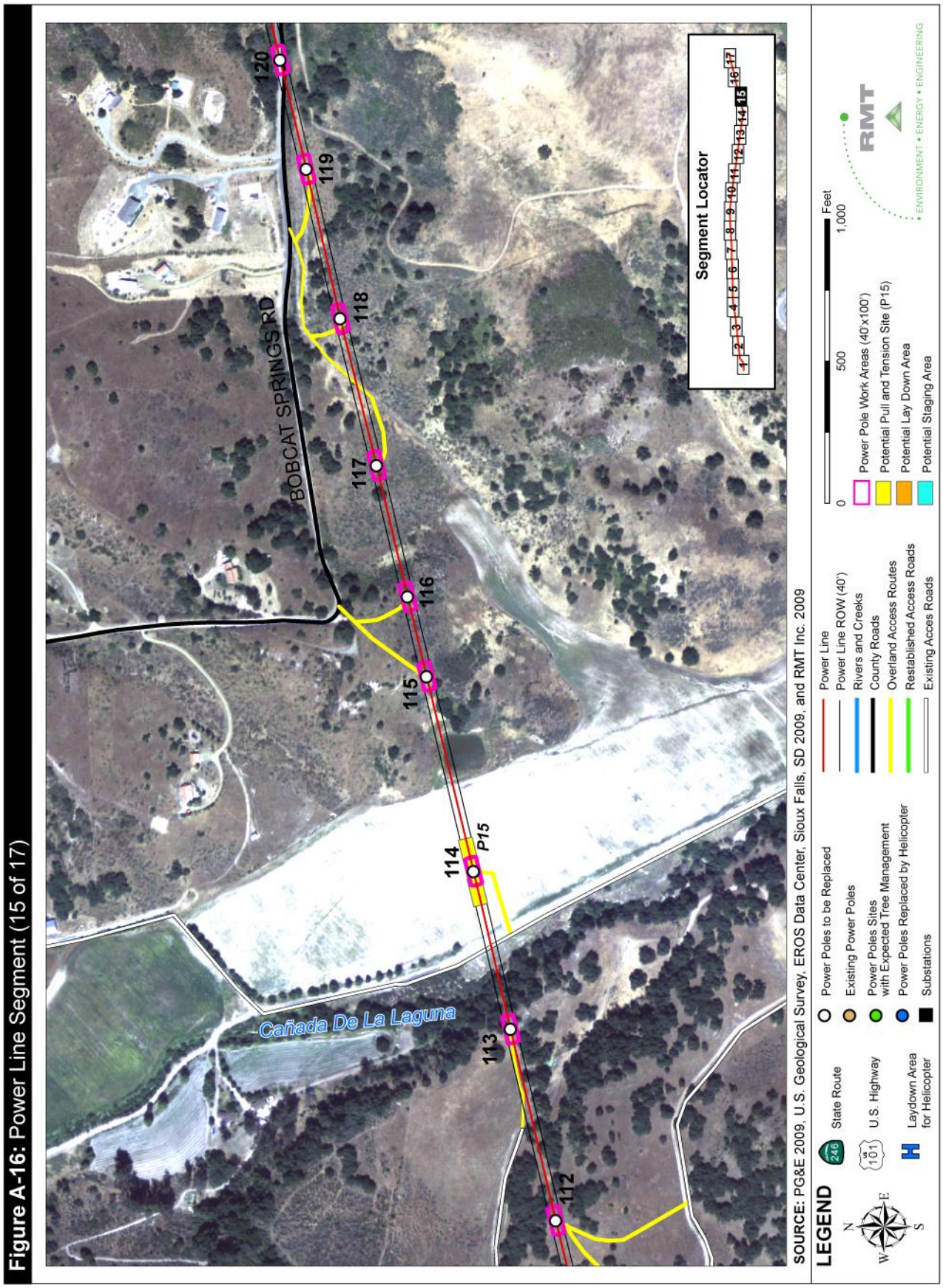
Figure A-16: Power Line Segment (15 of 17)
BOBCAT SPRINGS RD
Cañada De La Laguna
112
113
114
P15
115
116
117
118
119
120
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Reestablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P15)
Potential Lay Down Area
Potential Staging Area
RMT
ENVIRONMENT • ENERGY • ENGINEERING

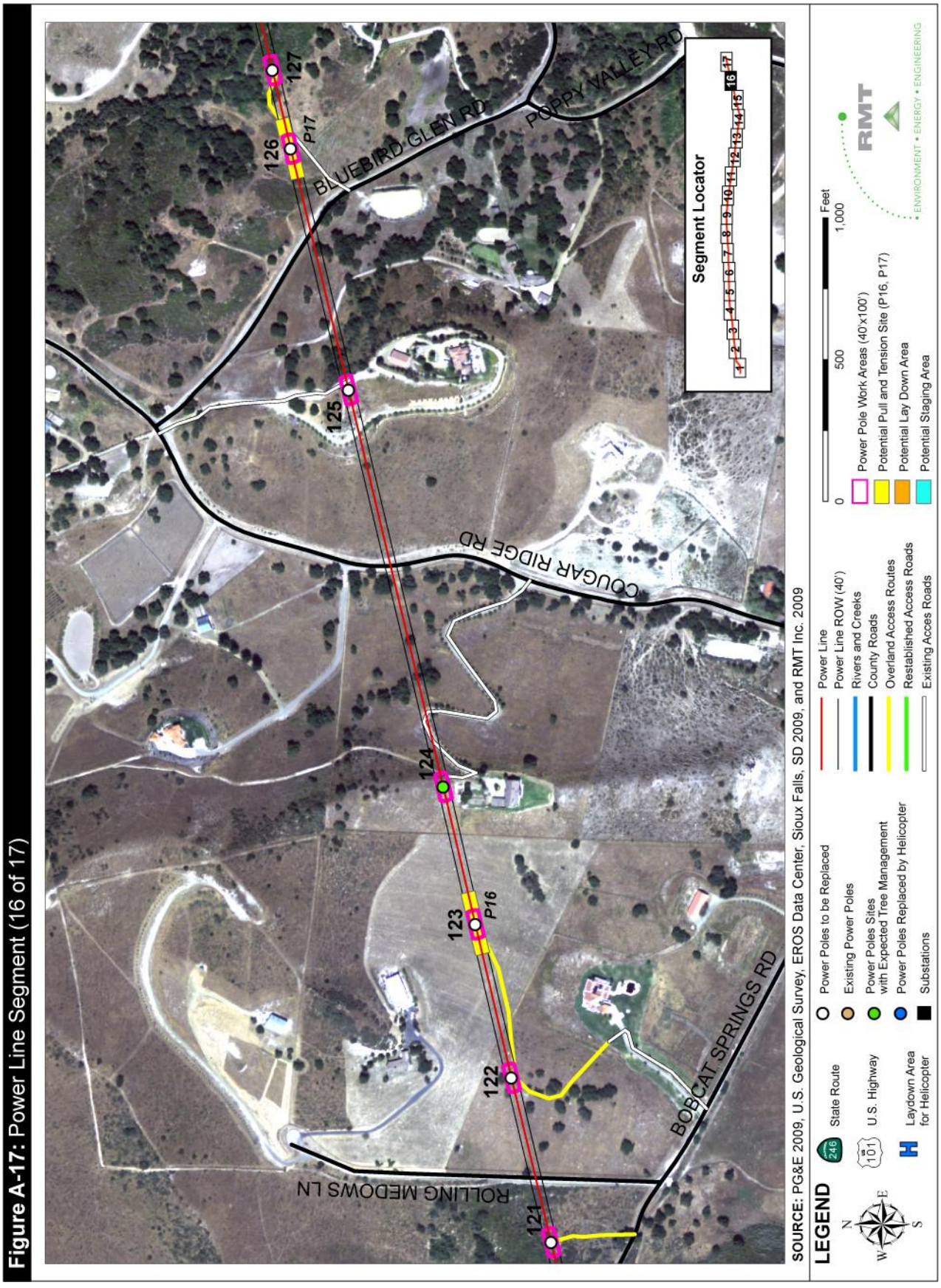
Figure A-17: Power Line Segment (16 of 17)
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
BLUEBIRD GLEN RD
POPPY VALLEY RD
COUGAR RIDGE RD
ROLLING MEDOWS LN
BOBCAT SPRINGS RD
121
122
123
124
125
126
127
P16
P17
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0
500
1,000
Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site (P16, P17)
Potential Lay Down Area
Potential Staging Area
RMT
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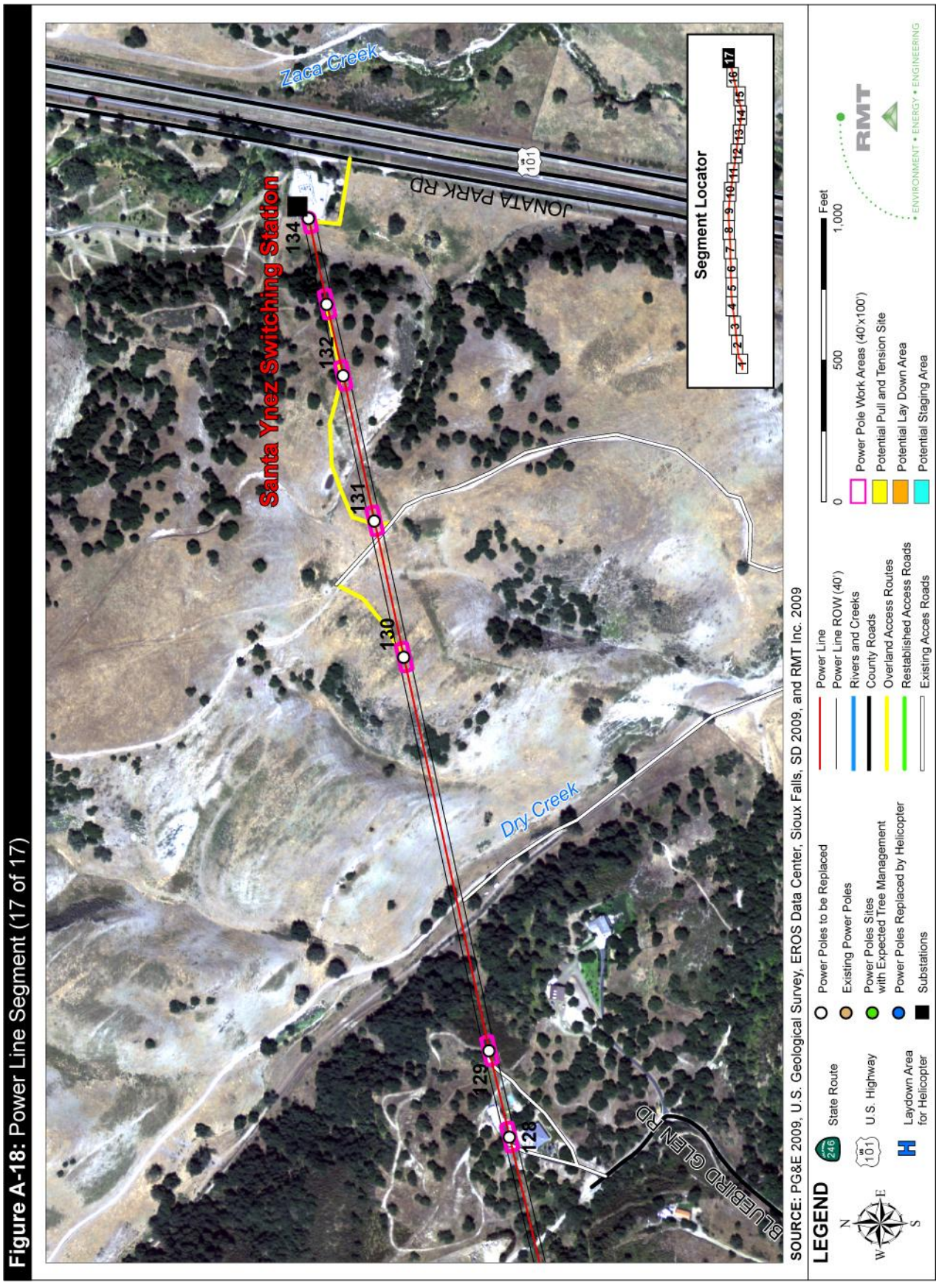
Figure A-18: Power Line Segment (17 of 17)
Zaca Creek
Santa Ynez Switching Station
JONATA PARK RD
BLUEBIRD GLEN RD
Dry Creek
128
129
130
131
132
134
Segment Locator
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17
SOURCE: PG&E 2009, U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009, and RMT Inc. 2009
LEGEND
State Route
U.S. Highway
Laydown Area for Helicopter
Power Poles to be Replaced
Existing Power Poles
Power Poles Sites with Expected Tree Management
Power Poles Replaced by Helicopter
Substations
Power Line
Power Line ROW (40')
Rivers and Creeks
County Roads
Overland Access Routes
Restablished Access Roads
Existing Acces Roads
0 500 1,000 Feet
Power Pole Work Areas (40'x100')
Potential Pull and Tension Site
Potential Lay Down Area
Potential Staging Area
RMT
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Appendix B:
Project Contact List

Project Contact List				
Name	**Agency/ Company**	**Job Title/Duties**	**Phone Number/Fax Number**	**Email Address**
Billie Blanchard	CPUC	CPUC Project Manager	(415) 703-2068 (office)	billie.blanchard@cpuc.ca.gov
Jo Lynn Lambert	PG&E	Attorney	(909) 793-4942 (office) (909) 528-6436 (cell) (415) 973-5248 (PG&E)	jllm@pge.com
Sam Danner	PG&E	Land Planner	(805) 305-7489 (cell) (805) 546-3836 (office)	sadk@pge.com
Lee Ellis	PG&E	PG&E Project Construction Manager	(805) 260-9331 (office)	lee2@pge.com
Jeff Glenn	PG&E	PG&E Construction Management		
Jim Layugan	PG&E	PG&E Construction Management		
Colleen Taylor	CH2M Hill	Environmental Lead	(510) 587-7644 (office) (510) 316-7406 (cell)	colleen.taylor@ch2m.com
Nicole McNair	ETIC	SWPPP Lead	(925) 602-4710 x 44 (office) (925) 408-6616 (cell)	nmcnair@eticeng.com
TBD	ETIC	SWPPP Monitor		
Christophe Descantes	PG&E	Cultural Lead	(415) 973-1177 (office) (925) 719-2740 (cell)	chd8@pge.com
Rick Hernandez	PG&E	Hazardous Material Lead	(805) 595 6376 (office) (805) 441 6408 (cell)	Rdh4@pge.com
TBD	Garcia and Associates	Environmental Monitors		
Brent Miyazaki	RMT	CPUC Monitoring Project Director	(323) 337-6513 (cell)	brent.miyazaki@rmtinc.com

Project Contact List *(Continued)*				
Name	**Agency/ Company**	**Job Title/Duties**	**Phone Number/Fax Number**	**Email Address**
Bonny O'Connor	RMT	CPUC Monitoring Project Manger	(650) 373-1200 (office)	bonny.oconnor@rmtinc.com
Charina Gaspay	RMT	CPUC Environmental Monitor	(650) 373-1200 (office)	charina.gaspay@rmtinc.com
Aaron Lui	RMT	CPUC Environmental Monitor	(650) 373-1200 (office)	aaron.lui@rmtinc.com
Logan Wicks	RMT	CPUC Environmental Monitor	(213) 458-5660 (cell)	logan.wicks@rmtinc.com

Appendix C:
Communication Protocol Summary

Section 2.3 of the Mitigation Monitoring, Compliance and Reporting Program (MMCRP) includes a communication protocol to ensure that CPUC Environmental Monitors (CPUC EMs) have access to project information, including schedules, mitigation measure status, and survey results. The communication protocol was also developed to establish a chain of command that will be used to report environmental issues observed during CPUC EM site inspections. The following table provides an outline of the communication protocol. For additional information, refer to Sections 2.0 and 3.0 of the MMCRP.

Table C-1: Communication Protocol

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
Meetings				
Regular Construction Meetings	PG&E CM	CPUC's EM	TBD	Regular construction meetings to be held in the field to discuss construction progress and construction and environmental issues. Refer to Section 2.3.2 of the MMCRP.
Bi-Weekly Teleconference Calls	CPUC Monitoring PD	CPUC PM	CPUC Monitoring PM CPUC EMs PG&E CM PG&E PM PG&E EMs	Bi-weekly teleconference call to discuss status of mitigation measures, construction schedule, issues noted during site visits, and project changes.
Field Meetings	PG&E or CPUC EMs	TBD	TBD	Field meetings may be requested by any party to discuss variance requests, non-compliances, or other site-specific issues.
Project Changes				
Scheduling	PG&E PM	CPUC Monitoring PM	CPUC EMs	Changes in project schedule that could affect the status of mitigation measures will be communicated to the CPUC Monitoring PM by email. If the project change would have an immediate impact, the CPUC EM or will be contacted by phone.

Table C-1 *(Continued)*: Communication Protocol

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
Variance Requests	PG&E PM or Environmental Lead	CPUC Monitoring PM	CPUC Monitoring PD and CPUC PM	All variance requests will be submitted to the CPUC Monitoring PM through the variance request form and supporting documentation. The CPUC Monitoring PM will forward the variance request to the CPUC PM and CPUC Monitoring PD after verifying the information is complete. The CPUC PM will distribute a variance request approval or denial after review is complete. Refer to Section 3.2.1 of the MMCRP.
Compliance Issues				
Minor Incidences and Non-compliance	CPUC EM or CPUC Monitoring PM	PG&E PM or Environmental Lead	PG&E TBD	Minor incidences and non-compliances noted during site inspections will be documented by the CPUC EMs and sent to PG&E for corrective action. Notification of a minor incident or non-compliance will occur no later than the following day. If PG&E corrects the issue before the report is issued, it will be noted in the report. Refer to Section 2.3.6 of the MMCRP.
General Concerns	CPUC EMs	PG&E EM	PG&E (TBD)	The CPUC EMs will contact PG&E EMs to discuss general issues and questions that come up during site visits. The CPUC may talk with other crew members on the ROW, but will not direct their work or rely on them for information regarding the project.
Agency Jurisdiction Concerns	PG&E PM	Applicable Agency	CPUC Monitoring PM	The resource agencies will be notified by PG&E of any issues regarding their jurisdiction. The CPUC Monitoring PM will also

Table C-1 *(Continued)*: Communication Protocol

Action Item	Responsibility	Primary Contact	Secondary Contact/ Participants	Description
				receive immediate notification. Communication between PG&E and resource agencies will be documented and submitted to the CPUC Monitoring PM. In addition, if the CPUC Monitoring PM have an unresolved concern about compliance with agency requirement, they will request to participate in a call with PG&E and the resource agency.
Dispute Resolution	All	CPUC Monitoring PM or PD	CPUC PM	In the event that a dispute cannot be resolved in the field, the CPUC Project Manager may issue a formal letter. Refer to Section 2.3.6 of the MMCRP.

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Appendix D:
Variance Request Form

Variance Request No.:_____

Environmental Variance Request Form
Cabrillo – Santa Ynez 115kV 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)_____

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Appendix E:
Temporary Extra Work Space Form

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?			
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 PD 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.

Property Owner: _____ Date:_____

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 Director: _____ Date:_____

Additional CPUC Conditions of Approval

_____

_____

_____

(CPUC Monitor Initial _____)

Reason(s) for Denial

_____

_____

_____

Appendix F:
Mitigation Monitoring Program Table

Mitigation Monitoring Program Table			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
APM AE-1	**APM Aesthetics (AE)-1: 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 equipment through on-site monitoring or photo documentation.	During construction
APM LU-1	**APM Land Use (LU)-1: Agriculture impacts avoidance.** To avoid potential impacts to agriculture, PG&E will work with farmers and ranchers to conduct its work between their harvest and planting periods where and whenever possible. In areas containing permanent crops (i.e., grape vines, tree orchard, etc.) that must be removed and replaced to gain access to poles sites for construction purposes, PG&E will provide compensation to landowners for crop loss and other reasonable and associated costs as soon as practicable after completion of construction. Access across active crop areas will be negotiated with the owners in advance of any construction activities	Verify coordination with landowners through documentation	During construction
APM AQ-1	**Mitigation Measure AQ-1 (Proposed to supersede APM AQ-1):** The following fugitive dust control measures would be implemented unless otherwise approved by the SBCAPCD. Copies of the finalized dust control measures would be submitted to the CPUC for recordkeeping. ▪ PG&E would use water trucks or sprinkler systems during construction on all active construction and disturbed areas to keep areas of vehicle and equipment movement sufficiently damp to prevent dust from leaving the site. At a minimum, this would include wetting down these areas in the late morning and after work is completed for the day. Watering frequency would increase whenever the wind speed exceeds 15 miles per hour (mph). ▪ Reclaimed water will be used whenever possible; however, reclaimed water will not be used in or around crops for human consumption.	Confirm the CPUC has received the name and telephone number(s) of the designated monitor(s) for the Dust Control Program	Prior to construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	▪ Construction equipment and related vehicles, including personal vehicles, would be limited to a maximum speed of 15 mph on unpaved roads ▪ All exposed soil stockpiles (e.g., soil and sand) would be covered. ▪ Gravel pads, bamboo mats, or a suitable equivalent would be installed at all access points to prevent tracking mud on to public roads, as discussed in the project's Stormwater Pollution Prevention Plan (SWPPP) ▪ PG&E would designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent dust transport off site. Monitor duties would include holiday and weekend periods when work may be in progress. The name and telephone number of the monitor would be provided to the SBCAPCD prior to project construction	Verify implementation of measures through on-site monitoring and During construction documentation from Dust Control Program designated monitor. Verify obtainment of finalized dust control measures through documentation.	During construction
APM GHG-1	**APM Greenhouse gas (GHG)-1: GHG emissions minimization.** The following measures will be implemented during construction to minimize GHG emissions. Park-and-ride facilities in the Project vicinity will be identified and construction workers will be encouraged 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 discussed in Section 4.10, Traffic and Transportation. Unnecessary construction vehicle idling time will be minimized. 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	Verify implementation of measures through on-site monitoring and documentation	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	powered vehicles, have extended warm-up times following start-up that limit their availability for use following startup. Where such diesel powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The Proposed Project will apply a "common sense" approach to vehicle use; 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. Construction equipment will be maintained in good working order, per manufacturing specifications. Low-emission construction equipment will be used where feasible to further minimize the minimal short-term increase in GHG emissions. With implementation of APM GHG-1, the entire construction effort for this project is forecasted to create 379 metric tons of CO2 which represents a small fraction of the emissions limit set by AB322020 (427 million metric tons CO2e).		
APM BO-1	**APM Biological Resources (BO)-1: 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.	Verify implementation of measures through on-site monitoring and documentation	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	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 shall 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 shall 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 through on-site monitoring and documentation.	During operation
APM BO-2	**APM BO-2: Avoidance of impacts to natural habitats** Minimization of grading and vegetation removal along access roads and pole work areas. Clearing and grading will be limited to previous access roads that have become overgrown with vegetation. Overland access routes and work areas around pole locations will not require any grading or vegetation removal other than minimal tree trimming as described	Verify implementation of measures through on-site monitoring and documentation	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	in the Project description. Tree removal. A single tree, a Leland Cypress, is planned for removal as described in the Project description. No other tree removal is planned. Re-vegetation. Since clearing and grading is limited to re-establishment of existing roads, no re-vegetation is needed for the Project. Temporarily disturbed vegetation is expected to recover without the need for reseeding.		
APM BO-4	**APM BO-4: General avoidance and minimization of impacts to aquatic or wetland habitat.** **Timing and extent of work in aquatic or wetland habitat.** Work in aquatic or wetland habitat is limited to the removal of two poles and replacement of one pole in the wetland northeast of SR 246. All ground-disturbing work at this location will take place in dry conditions. The timing is dependent on seasonal rainfall; in winter 2008-2009, ground was dry even in January.	Verify construction activities through on-site monitoring and documentation	During construction in wetland or aquatic habitat
APM BO-5	**APM BO-5: Avoidance of impacts to California red-legged frog, California tiger salamander, western spade foot toad and western pond turtle in proximity to identified suitable breeding ponds or aquatic habitat.** **Dawn and dusk timing restrictions.** Construction activities within 600 feet of suitable aquatic habitat shall not begin prior to 30 minutes after sunrise and will cease no later than 30 minutes before sunset.	Confirm construction time requirements for aquatic habitat. Ensure netting material is made of suitable material	Prior to construction
	Erosion control materials. Only tightly woven netting or similar material shall be used for all geo-synthetic erosion control materials such as coir rolls and geo-textiles. No plastic monofilament matting will be used.	Confirm construction time requirements for aquatic habitat. Ensure netting material is made of suitable material	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
APM BO-9	**Avoidance of and minimization of potential impacts to wetlands and water resources.** Stormwater Pollution Prevention Plan and erosion control measures. As described in Section 4.8, APMs WQ-1 and WQ-3, 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 required contents in the SWPPP	Prior to construction
		Verify SWPPP and erosion control measure are being implemented correctly through on-site monitoring and documentation. Verify that supplementary measures are being implemented as necessary through on-site monitoring.	During construction
MM Bio-1	**Mitigation Measure Bio-1 (Proposed to supersede APM BO-1 "Development and implementation of a Worker Environmental Awareness Program"):** A qualified biologist would conduct an environmental awareness program for all construction and on-site	Verify required contents in the WEAP.	Prior to construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	personnel prior to the beginning of construction activities. Training would include the following topics and information: A discussion of avoidance and minimization measures being implemented to protect biological resources as well as the terms and conditions of the Biological Opinion and other permits. A map depicting all of the locations of previously flagged/marked sensitive and special status plants. The map would be accompanied with an explanation of how the locations were demarcated out in the field. Information on the federal and state Endangered Species Acts, as well as other applicable state and federal laws protecting sensitive plant and wildlife species, nesting birds, wetlands, and other water resources. The consequences of noncompliance with these acts and laws would be disclosed to the workers. -Information about the presence, life history, defining characteristic, and habitat requirements of all special-status species with a potential to be affected within the project area. An educational brochure would be produced for construction crews working on the project. The brochure would include color photos of sensitive species as well as a discussion of mitigation measures.	Verify all construction and on-site personnel have undergoing training through documentation and on-site monitoring.	During Construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
MM Bio-2	**Mitigation Measure Bio-2 (Proposed to supersede APM BO-1 "Biological monitor on-site during construction activities in sensitive areas" and "Reporting and communication"):** A qualified biological monitor would be on site during all ground-disturbing construction activities in or near sensitive habitats previously identified by a qualified biologist. The monitor would ensure implementation of and compliance with all avoidance and mitigation measures. The monitor would 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 would document monitoring activities in daily logs to document construction activities and environmental compliance. The daily logs would be included in the project report submitted to the appropriate agencies following completion of construction.	Confirm qualifications of the monitor	Prior to construction
	The biological monitor would 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 would be submitted to CPUC, and to any resource agencies (upon request), throughout construction. A final project summary report would be submitted to the CPUC 90 days after the completion of construction activities.	Verify biological monitoring through daily logs and reports.	During construction
MM Bio-3	**Mitigation Measure Bio-3 (Proposed to supersede APM BO-1 "Identification and marking of sensitive resource areas"):** Sensitive resources identified during pre-construction surveys in the project vicinity would be mapped and clearly marked in the field. Such areas would 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, would be implemented to avoid or minimize impacts.	Verify that sensitive areas are clearly marked and avoided through on-site monitoring.	During construction
MM Bio-4	**Mitigation Measure Bio-4 (Proposed to supersede APM BO-2 "Weed management"):** All project vehicles would be washed before arrival on site at PG&E's Santa Maria,	Verify vehicles are washed thoroughly	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	Lompoc, or Buellton PG&E wash facilities or otherwise approved wash-down location. Vehicles would also be cleaned at an appropriate wash facility, at the completion of the project or when off-road use for that vehicle has been completed.	prior to arriving on-site and at the completion of use on-site through on-site monitoring.	
MM Bio-5	**Mitigation Measure Bio-5 (Proposed to supersede APM BO-3 "Avoidance of and minimization of potential impacts to special-status plants"):** A pre-construction survey would be conducted by a qualified botanist or biologist prior to commencement of construction in each area. All rare plant populations would be appropriately marked or flagged for exclusion, or as appropriate, the limits of construction will be marked between the population and the work area. Surveys and marking or flagging must be completed no more than 30 days prior to construction. In the event that any previously unidentified listed plants, or CNPS List 1-3 plants cannot be avoided, PG&E would consult with the USFWS and/or the CDFG (depending on whether the species is on the federal or state list of sensitive species) to determine appropriate measures to minimize effects to the species and its habitat during construction of the project, as well as during operation and maintenance. The CPUC would be informed of the results of any agency consultations.	Verify the completion of survey through documentation. Verify necessary marking or flagging through photo documentation or on-site visit. Verify any necessary agency consultations through documentation.	No more than 30 days prior to construction
		Verify that sensitive plants are clearly marked and avoided through on-site monitoring. Verify agency consultations, if necessary, through documentation.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
MM Bio-6	**Mitigation Measure Bio-6 (Proposed to supersede APM BO-5 "Pre-construction surveys and relocation of species"):** Pre-construction surveys for special-status amphibians and aquatic reptiles would be conducted no more than two weeks prior to the commencement of construction. Surveys would include work areas within 600 feet of suitable CTS breeding habitat and work areas within 300 feet of suitable CRLF aquatic habitat. Surveys would be conducted by a qualified, agency-approved biologist. Potential habitat for western spade foot toad and western pond turtle exists in similar locations to those for CRLF and CTS. The biologist would relocate any special-status species to a location previously agreed upon by the USFWS and the CDFG. Before the start of work each morning, the biologist would check under any equipment and stored construction supplies left in the work area overnight within 600 feet of suitable habitat. All pole holes would be backfilled or covered at the end of the work day to prevent entrapment of special-status species.	Verify the completion of survey through documentation.	No more than 2 weeks prior to construction in suitable habitat buffer.
		Verify daily biological sweep of work area within suitable habitat through documentation and on-site monitoring.	During construction
MM Bio-7	**Mitigation Measure Bio-7 (Proposed to supersede APM BO-5 "Seasonal timing restrictions"):** All ground-disturbing construction activities within 600 feet of suitable habitat for CFLF, CTS, western spade foot frog, and western pond turtle would be limited to May 1 through October 31, to the greatest extent feasible. For work in these areas, a qualified biologist would conduct a pre-construction survey of the work area immediately preceding construction activities. All potential habitat areas including burrows, woody debris piles, wetlands, riparian areas, and edges of ponds within the work area would be thoroughly checked. Any special-status species found would be captured and relocated to a FWS and CDFG approved location type (e.g., a small mammal burrow) and area, prior to the start of construction.	Verify the completion of survey through documentation.	Immediately prior to construction in suitable habitat buffer.
		Verify construction activities to only occur during May1 to October 31within suitable habitat through on-site monitoring and documentation.	During construction
MM Bio-8	**Mitigation Measure Bio-8 (Proposed to supersede APM BO-5 "Minimization of burrow disturbance"):** Plywood sheets would be used to temporarily cover potentially active	Verify plywood sheets are used to	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	burrows in work areas within 600 feet of suitable breeding habitat. Burrows would be covered after re-location has taken place, if necessary, or otherwise specified in the Biological Opinion.	cover potentially active burrows after relocation or in accordance to BO protocol through documentation and on-site monitoring.	
MM Bio-9	**Mitigation Measure Bio-9 (Proposed to supersede APM BO-6 "Avoidance of and minimization of potential impacts to southwestern willow flycatcher and least Bell's vireo"):** Work anticipated within 300 feet of the potential nesting habitat for these species and the designated critical habitat for southwestern willow flycatcher includes the use of pull site P1 and insulator replacement at Poles 4, 5, and 6. Insulator replacement and use of the pull site would be restricted to the non-nesting season. For the purposes of this measure, the nesting season for these species is considered to be March 15 to September 15. Additionally, the raptor nesting season extends from February 1 through August 15. Work within the period of February 1 to September 15 in this area would only occur if pre-construction surveys determine these species are not actively nesting within 300 feet of the work areas, or a qualified biologist is present during all activities to monitor for potential nest disturbance per an Avian Protection Plan as described in Mitigation Measure Bio-12.	Verify the completion of survey through documentation.	Prior to construction
		Verify construction activities to only occur during September 16 to January 31 to within critical habitat through on-site monitoring and documentation. Verify results of preconstruction surveys through documentation to allow work to occur from January 31 through March 14.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
MM Bio-10	**Mitigation Measure Bio-10 (Proposed to supersede APM BO-7 "Avoidance of and minimization of potential impacts to western burrowing owl"):** The following methods would be employed unless otherwise approved by CDFG or USFWS. Pre-construction burrowing owl surveys would be conducted by a qualified biologist within 250 feet of areas within burrowing owl habitat subject to disturbance. Burrowing owl surveys would follow the CDFG's Burrowing Owl Protocol Survey and Mitigation Guidelines (California Burrowing Owl Consortium 1993) and shall occur between February 1 and September 30. If ground-disturbing activities are delayed or suspended for more than 30 days after the pre-construction surveys, the site would be resurveyed. If no burrowing owls are detected, no further mitigation is necessary. Appropriate avoidance, minimization, or protection measures shall be determined in consultation with CDFG in the event that construction is located within 150 feet of occupied burrows or nests during the non-breeding season, or within 250 ft of an area	Verify the completion of survey through documentation. Verify PG&E's consultation for appropriate mitigation with CDFG if burrowing owls are detected.	30 days prior to construction in suitable habitat buffer.

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	subject to disturbance during the breeding season. Measures-could include, but would not be limited to the following: No disturbance would 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 The limits of the exclusion zone in the project work area would be clearly marked with signs, flagging and/or fencing If work within these limits is unavoidable while burrows are active, work would only take place within the presence of a qualified monitor who would monitor to determine if the owls show signs of disturbance or, upon prior approval from CDFG a passive relocation effort (displacing the owls from the work area) may be conducted as described below, and subject to the approval of the CDFG. Passive relocation of owls may occur during the non-breeding season (September 1 through January 31) with prior approval from CDFG. Passive relocation would include installing one-way doors on the entrances of burrows. The one-way doors would be left in place for 48 hours to ensure the owls have vacated the nest site. Owls would not be relocated during the breeding season.	Verify appropriate buffers and/or on-site monitors are established.	During construction surrounding an active burrow or nest
MM Bio-11	**Mitigation Measure Bio-11:** The open ends of light-duty steel poles would be covered during storage to prevent burrowing owls or any other sensitive species from inhabiting the pole openings.	Verify pole ends are covered through on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
MM Bio-12	**Mitigation Measure Bio-12 (Proposed to supersede APM BO-8 "Avoidance of and minimization of potential impacts to song birds, raptors and other migratory bird species"):** Pre-construction bird nesting surveys for pull sites or locations of pole replacement or clearing and grading activities would be conducted before work performed between February 1 and August 15. See mitigation measure Bio-9 for pre-construction survey requirements near the Santa Ynez River. Pre-construction surveys would be conducted within the ROW and from the ROW of areas visible from the ROW. To the extent possible, working in the vicinity of active nests would be avoided; however, if avoidance is not practicable, a buffer zone, as determined by a qualified biologist, would be maintained around the active nest to prevent nest abandonment. In the event that work would take place within 50 feet (300 feet for raptors) of an active nest, a biological monitor would monitor the activity of the nesting birds during work to determine if construction activities are resulting in significant disturbance to the birds. If the qualified biologist determines that work is disrupting nesting, then work in that area would be halted until nesting is completed and the young have fledged. Monitoring guidelines would be provided in an Avian Protection Plan to be submitted to the USFWS and CDFG for review and approval prior to construction. Documentation of Plan approval would be submitted to the CPUC for recordkeeping. Installation of the replacement power lines would conform to PG&E's most current version of Bird and Wildlife Protection Standards, and would include the use of bird guards.	Verify the completion of survey through documentation. Verify CDFG and USFWS approval of Avian Protection Plan through documentation.	Prior to construction
		Verify appropriate buffers and/or on-site monitors are established. Verify power line conformance with Bird and Wildlife Protection Standards through documentation.	During construction surrounding an active nest.
APM CR-1	**APM Cultural Resources (CR)-1: Archaeological site avoidance.** To ensure that Æ-1857-3H is not inadvertently damaged during implementation of the Project, the limits of the work areas listed in Potential Impact CR-1 will be marked with readily visible flagging tape and the construction crews will be instructed that there will be no vehicle access, travel, equipment staging and storage, or other construction-related work outside of the flagged work areas when working at Pole 13.	Verify that the cultural site is clearly marked and avoided through on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
APM CR-2	**APM CR-2: Pre-construction Worker Education Program.** 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 shall 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 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. 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.	Verify required content in the WEP.	Prior to construction
APM CR-3	**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 resources specialist or his/her designated representative will	Verify the implementation of proper procedures through	During a discovery of a previously unidentified cultural

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	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 State of California Department of Parks and Recreation cultural resource records 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 resources, and implement data recovery excavation or other appropriate treatment measures if warranted.	documentation and on-site monitoring	resource
MM Cultural-1	**Mitigation Measure Cultural-1:** Environmental training would 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. This training may be combined with other environmental training for the project, provided that the program elements pertaining to cultural resources are provided by a qualified instructor meeting applicable professional qualification standards. In the unlikely event that previously unidentified paleontological resources are uncovered during implementation of the project, all ground disturbing work would be temporarily halted or diverted away from the discovery to another location. PG&E's paleontological resources specialist or his/her designated representative would inspect the discovery and determine whether further investigation is required. If the discovery is significant, but can be avoided and no further impacts would occur, the resource would be documented in the appropriate paleontological resource records and no further effort would be required. If the resource is significant, but cannot be avoided and may be subject to further impact, PG&E would evaluate the significance of the resources, and implement data recovery excavation or other appropriate treatment measures as recommended by a qualified paleontologist.	Verify required content in the environmental training documentation.	Prior to construction
		Verify training of paleontological resources and procedures documentation. Verify the implementation of procedures through documentation and on-site monitoring.	During construction and during a discovery of a previously unidentified paleontological resource

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
APM GM-2	**APM GM-2: 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 appropriate measures have taken place through on-site monitoring	During construction at location with soft or loose soils
APM HM-2/WQ-2	**APM HM-2/WQ-2: Environmental Training and Monitoring Program (ETMP) development and implementation.** An environmental training program will be established to communicate to all field personnel any environmental concerns and appropriate work practices, including spill prevention and response measures and Best Management Practices (BMPs). The training program 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 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 monitoring program will also be implemented 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, will also be implemented during the Project to	Verify required content in the WEP.	Prior to construction
		Verify training and implementation of ETMP through documentation and on-site monitoring.	During construction
		Verify implementation of ETMP through documentation and	During operation

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
		on-site monitoring.	
MM Haz-1	**Mitigation Measure Haz-1 (Proposed to supersede APM HM-1):** PG&E would submit a Hazardous Substance Control and Emergency Response Plan to the CPUC for recordkeeping at least 30 days prior to project construction. The plan would 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 would 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 would 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 would 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 would be scheduled for transportation to the appropriate licensed Class 1 or a composite-lined portion of a solid waste landfill. The plan	Verify required content in the Hazardous Substance Control and Emergency Response Plan.	30 days prior to construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	would include, but not be limited to, the following: ▪ 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 ▪ Stopping work and contacting the County Fire Department, Hazardous Materials Unit (HMU) immediately if visual contamination or chemical odors are detected. ~~The resumption of work would require the approval of the HMU.~~ Work would be resumed at this location after any necessary consultation and approval by the HMU.[1] ▪ Notifying the appropriate Certified Unified Program Agency (CUPA) inspector of the storage and disposal locations for wooden poles removed, prior to initiating construction	Verify implementation of Hazardous Substance Control and Emergency Response Plan through documentation and on-site monitoring.	During construction with exposure to hazardous materials
Hazardous Substance Control and Emergency Response Plan	**ON-SITE REFUELING** If on-site refueling is needed, no vehicles or equipment will be refueled within 100 feet of a stream with a defined stream channel or bank, a wetland, or a pond unless a bermed and lined refueling area is constructed, secondary containment is otherwise in place, or the refueling area is down gradient or hydrologically separated (e.g. such as a site across a road and down gradient of the wetland).	Verify refueling is occurring in appropriate locations through on-site monitoring	During refueling events
	HAZARDOUS DISPOSAL With the exception of the poles, all hazardous materials would be collected in project-specific containers at the site, and transported to a PG&E service center designated as a	Verify disposal is occurring appropriately	During construction

[11] The CPUC and PG&E agreed on June 22, 2010 to change the last sentence of the second to last bullet of Mitigation Measure Haz-1 in order to clarify the process to resume work.

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	PG&E consolidation site. Poles removed from the Project would be scheduled for transportation to the appropriate licensed Class 1 or a composite-lined portion of a solid waste landfill. If potentially contaminated soils are discovered (e.g. based on odor, color, sheen), then work at the site would be halted, the soil would be collected and contained while awaiting test results (i.e. in a drum). The soil will be sampled, analyzed, and characterized to determine proper disposal.	through on-site monitoring.	
	HAZARDOUS SUBSTANCE RELEASE RESPONSE PLAN The Hazardous Substance Release Response Plan is to be followed as a control measure in the event of a hazardous substance release. Steps included, ▪ Initial response ▪ Containment techniques ▪ Emergency coordinator duties ▪ Emergency response plan ▪ Clean up of insulating oil ▪ Sampling requirements ▪ Transportation and handling of release clean up debris hazardous waste ▪ Notifications ▪ Document retention	Verify Hazardous Substance Release Response Plan through documentation.	During hazardous spills
MM Haz-2	**Mitigation Measure Haz-2 (Proposed to supplement APM HM-2/WQ-2):** PG&E would prepare a site-specific Health and Safety Plan (HSP) to ensure that potential safety hazards would be kept at a minimum. The HSP would include elements that establish worker training and emergency response procedures relevant to project activities. The plan would	Verify required content in the Health and Safety Plan	30 days prior to construction
		Verify training and	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	be submitted to the CPUC at least 30 days prior to construction for CPUC recordkeeping.	implementation of HSP through documentation and on-site monitoring.	
		Verify implementation of HSP through documentation and on-site monitoring.	During operation
Health and Safety Plan	All personnel working on this project or in the area of this project will read and be familiar with this HASP before doing any work. All project personnel will sign the certification page acknowledging that they have read and understand this HASP.	Verify training logs to ensure that all project personnel have signed the certification page through documentation.	During construction
	WORKER BOUNDARIES – ENERGIZED LINES When work will occur near energized electrical lines, clearly defined work boundaries and limits will be established (e.g. applicable regulations, including NFPA 70E). A 25-foot set-back distance from live electrical lines is the communicated safe working distance for mobile equipment. Physical barriers will be constructed, if necessary, to limit equipment proximity and warn operators of this hazard. Qualified, high voltage electrical workers may work closer than 25 ft to energized conductors.	Verify distance of workers from energized electrical lines through on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	FLAME RETARDANT CLOTHING Every person will ensure that they wear Flame Retardant (FR) clothing that has an arc rating greater than or equal to the available hear energy whenever they are within the Arc Flash Boundary. In addition, everyone will ensure that they wear clothing that cannot melt or ignite and continue to burn in the presence of electric arcs to which personnel could be exposed, whenever they are working on or around PG&E electrical facilities. All garments will have tags visible from the outside that clearly identified the garment as Flame Resistant and clearly indicates the arc rating (HRC category) of the garment. All garments will have a minimum rating of HRC 2. PG&E personnel will refer to the PG&E Flame-Resistant (FR) Clothing Procedures (Utility Work Procedure WP2509) to determine the appropriate Flame Retardant clothing for this Project.	Verify flame resistance of worker's clothing within 12 ft of the 115kV line through on-site monitoring.	During construction
	SAFETY VESTS When deciding which vest (Class III or Class II) to wear, employees will comply with the following regulations: Class III vests are required in traffic areas where vehicle speeds exceed 50 mph; high volume traffic and unmonitored equipment movement; users and vehicle operators with multi-task loads that divert attention and increase risk; complex backgrounds; work activities taking place in or near unimpeded vehicle traffic; work activities taking place under icy or snowy conditions; and work activities taking place in low light or at nighttime. A traffic area is defined as any roadway, highway, freeway, street or parking lot area, as well as construction sites and PG&E yards where employees on foot are exposed to moving construction vehicles or equipment. Additionally, the Class III vests are Flame Retardant, can be worn in Arc Flash Hazard boundaries. In addition to the new safety vests, the long-sleeve orange FR shirt with reflective material also meets the Class III standard and the ANSI visibility standard.	Verify proper vest are being worn by construction personnel through on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	Employees wearing these shirts are not required to wear a safety vest over them. Class II vests are required in all other situations (day or night at speeds under 50 mph). Class II vests are Flame Retardant, can be worn in Arc Flash Hazard boundaries.		
	TAIL GATE MEETINGS Tailgate safety briefings will be conducted, as needed, at the beginning of the work day, or as tasks/hazards change. Each tailgate safety briefing will be documented on the form included in the Site Activities Tailgate Health and Safety Briefing Form. This briefing form documents the tailgate briefing conducted in accordance with the HASP. Personnel who perform work operations on site are required to attend each briefing and to acknowledge receipt of each briefing, at least daily.	Verify tailgate meetings through documentation.	During construction
	SAFETY EQUIPMENT All employees working on this project must be shown the location and proper use of all emergency equipment prior to beginning work on the project.	Verify workers knowledge of safety equipment location and use through on-site monitoring.	During construction
	SUBCONTRACTORS In the event that the subcontractor's procedures/requirements conflict with requirements specified in this HASP, the more stringent guidance will be adopted after discussion and agreement between the subcontractor and project health and safety personnel. Hazards not listed in this HASP, but known to the subcontractor or known to be associated with the subcontractor's services, must be identified and addressed to the project or task manager and construction crew foreman prior to beginning work operations. The "Subcontractor Acknowledgement Memo" must be signed and dated by the subcontractor's management and placed in the project file before they can begin work on the project. Once the signed memo is received by the project manager, this HASP can be provided to the subcontractor to use as their own. Subcontractors working at the project	Verify subcontractors Memo is signed and included in the project record through documentation.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	site will need to have this plan with them, and will also need to sign the Subcontractor HASP receipt signature page.		
MM Haz-3	**Mitigation Measure Haz-3:** If it is necessary to store any chemicals on-site, they would be managed in accordance with all applicable regulations. Material Safety Data Sheets would be maintained and kept available on-site, as applicable.	Verify that stored chemicals have the MSDS on-site and are being stored in accordance with applicable regulations through documentation and on-site monitoring.	During construction
MM Haz-4	**Mitigation Measure Haz-4:** 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 would be tested and, if contaminated above hazardous levels, would be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil would require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.	Verify appropriate testing of potentially contaminated soils through documentation and on-site monitoring.	During construction
MM Haz-5	**Mitigation Measure Haz-5 (Proposed to supersede APM HM-3):** PG&E would 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 would include fire protection and prevention methods for all components of the project. The plan would 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 would be directed to park away from dry vegetation; to equip vehicles with fire extinguishers; not to smoke; and to	Verify required content in the Fire Prevention and Response Plan.	30 days prior to construction
		Verify implementation of Fire Prevention and Response Plan	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	carry water, shovels, and fire extinguishers in times of high fire hazard. The plan would also include contacting the Santa Barbara County Fire Department when work is scheduled on Red Flag Days as designated by the National Weather Service.	through documentation and on-site monitoring.	
		Verify coordination with SBCFD on Red Flag Days through documentation.	During operation
Fire prevention and Response Plan	**FIRE PREVENTION** All employees shall observe all laws, rules, and regulations of fire agencies having jurisdiction over areas in which they are working (including work areas outside the project site). No employee shall perform any operation or action which could result in vegetation or forest fires. No employee shall smoke at or in the vicinity of the project site, except in designated areas that are cleared of vegetation. Employees shall make every attempt to park away from dry vegetation. Management of any flammable materials at the project site will be in a manner to minimize fire risk potential.	Verify fire laws are being followed through on-site monitoring.	During construction
	FIRE RATINGS The person in charge shall also be aware of the possibility of increased fire danger during the time work is in progress. The person will contact the Santa Barbara County Fire Department when work is scheduled on Red Flag Days as designated by the National Weather Service. Additionally, through arrangements with the California Department of Forestry and Fire Protection (Cal Fire) and the United States Forest Service, PG&E is notified daily during the California "Fire Season" when next-day fire adjective ratings of Very High or Extreme	Verify Fire Ratings are followed as appropriate through on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	are calculated for any adjective rating zone within PG&E's service territory. The rating received by PG&E is the prediction of the most severe rating expected for that area the following day and is used as the rating for that day. This information posted on the PG&E Intranet at: http://www/fireindex/ The rating is posted by 2100 hours (9:00 p.m.) each day and becomes effective at 0800 hours (8:00 a.m.) the following day. Effective hours of fire adjective ratings, unless canceled or extended by local authorities, are as follows: Very High and Extreme: 0800 until 2 hours after local sunset time, daily. All other ratings (Low, Medium, and High) do not have specific times noted.		
	REQUIRED FIRE EQUIPMENT All personnel working in hazardous fire areas must be equipped with firefighting equipment such as, but not limited to, shovels, axes, back pumps, fire extinguishers, etc. Such equipment shall be maintained in good working condition at all times. Company construction vehicles shall be furnished with the necessary fire prevention equipment.	Verify personnel working in hazardous fire areas must be equipped with appropriate firefighting equipment through on-site monitoring.	During construction
APM WQ-2/HM-2	**APM WQ-2/HM-2: Environmental Training and Monitoring Program (ETMP) development and implementation.** Worker environmental awareness will communicate	Verify required content in the ETMP.	Prior to construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	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. A monitoring program will also be implemented 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, will also be implemented during the Project to minimize the risk of an accidental release and to provide the necessary information for emergency response.	Verify training and implementation of ETMP through documentation and on-site monitoring.	During construction
MM Hydo-1	**Mitigation Measure Hydro-1 (Proposed to supersede APM WQ-1):** Following project approval, PG&E would prepare and implement a SWPPP to minimize construction impacts on surface and groundwater quality. Implementation of the SWPPP would help stabilize graded areas and waterways and reduce erosion and sedimentation. The plan would designate BMPs that would 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) would be installed before the onset of winter rains or any anticipated storm events. Mulching, seeding, or other suitable stabilization measures would be used to protect exposed areas during construction activities, as necessary. During construction, measures would be in place to ensure that contaminants are not discharged from the construction sites.	Verify required content in the SWPPP.	Prior to construction
		Verify implementation of SWPPP through documentation and on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
MM Hydo-2	**Mitigation Measure Hydro-2 (Proposed to supersede APM WQ-3/GM-2):** PG&E would prepare an Erosion Control and Sediment Transport Plan (ECSTP) as an element of the SWPPP describing BMPs, to be used during construction. The plan would address construction in or near sensitive areas described in Section 3.5 Biological Resources. BMPs, where applicable would 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 ▪ 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 would 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, would remain in place until disturbed areas have stabilized. The ECSTP would be submitted to the CPUC for review at least 30 days prior to the commencement of construction. The plan would be revised and updated as needed, and re-submitted to the CPUC if construction activities evolve to the point that the existing approved ECSTP does not adequately address the project.	Verify required content in the ECSTP.	30 days prior to construction
		Verify implementation of ECSTP through documentation and on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
APM Land Use (LU)-1	**Agriculture impacts avoidance.** To avoid potential impacts to agriculture, PG&E will work with farmers and ranchers to conduct its work between their harvest and planting periods where and whenever possible. In areas containing permanent crops (i.e., grape vines, tree orchard, etc.) that must be removed and replaced to gain access to poles sites for construction purposes, PG&E will provide compensation to landowners for crop loss and other reasonable and associated costs as soon as practicable after completion of construction. Access across active crop areas will be negotiated with the owners in advance of any construction activities.	Verify consultation with local farmers and ranchers through documentation. Verify that negotiation of crop compensation is made through documentation.	Prior to construction
		Verify compensation for lost crops through documentation	Post-construction
APM NO-1	**APM Noise (NO)-1: Noise minimization with portable barriers.** Compressors and other small stationary equipment will be shielded with portable barriers in proximity to residential areas.	Verify use of noise barriers through on-site monitoring and documentation	During construction
APM NO-2	**APM NO-2: 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 through on-site monitoring and documentation	During construction
APM NO-3	**APM NO-3: Noise minimization through direction of exhaust.** Equipment exhaust stacks and vents will be directed away from buildings	Verify direction of stacks and vents through on-site monitoring	During construction
APM NO-4	**APM NO-4: Noise minimization through truck traffic routing.** Truck traffic will be	Verify truck routes through	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	routed away from noise-sensitive areas where feasible.	documentation and on-site monitoring	
APM NO-5	**APM NO-5: Noise disruption minimization through residential notification.** PG&E will coordinate with the City of Lompoc and the County of Santa Barbara to notify residents that are located near the power lines of the timeframe for the construction activities.	Verify residents have been notified through documentation.	Prior to construction
MM Traffic-1	**Mitigation Measure Traffic-1 (Proposed to supersede APM TT-1):** PG&E would develop a project-specific TMP, which would be submitted to the CPUC for review at least 30 days prior to construction. The TMP would conform to the California Joint Utility Traffic Control Committee's *Work Area Protection and Traffic Control Manual*. The TMP would 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 would be used to guide vehicles through or around construction zones using proper construction techniques. ▪ Provision that all equipment and materials would 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 would be limited to safe levels as appropriate for all roads, including access roads and overland routes without existing, posted speed limits.	Verify required content in the TMP. Verify the TMP is properly implemented through documentation and on-site monitoring	30 days prior to construction During construction
Traffic Management Plan	**TRAFFIC CONTROL** From the edge of the work area (PG&E's ROW), appropriate traffic signage will be placed at 1,000-foot intervals along SR 246, up to 3,100 feet to each side of the ROW. Appropriate traffic signage will also be placed at 350-foot intervals along any crossroad up to 700 feet to	Verify traffic control through on-site monitoring.	During construction

Mitigation Monitoring Program Table *(Continued)*			
APM/ Mitigation Measure	**APM/Mitigation Measure**	**Implementation/ Monitoring Method**	**Implementation Schedule**
	each side of the ROW crossing. Flaggers will be posted to each side of the ROW		
	TRAFFIC SPEED PG&E staff and contractors will follow posted 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. Vehicle speed on unpaved roads is limited to 15 miles per hour, except where safety considerations supersede this requirement, e.g. when heavy loads approach a steep hill.	Verify project traffic speed through on-site monitoring.	During construction

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