

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 16, 2019

Mr. David Thomas  
245 Market Street, Room 1054D  
San Francisco, CA 94105

**RE: Notice to Proceed #4 for the Fulton-Fitch Mountain Reconductoring Project**

Dear Mr. Thomas,

Pursuant to the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) prepared an Initial Study (IS)/Mitigated Negative Declaration (MND) for Pacific Gas and Electric Company's (PG&E's) Fulton-Fitch Mountain Reconductoring Project (Application No. 15-12-005). On December 18, 2017, the CPUC issued a decision to adopt the Final MND (2017 MND) and grant PG&E a Permit to Construct the approved project (Decision No. 17-12-012). On June 29, 2018, PG&E submitted a Petition for Modification in which PG&E requested changes to the approved project that were not specified in the 2017 MND, including replacing the 21 TSPs in the Southern Segment and related construction activities as part of the reconductoring process. The CPUC prepared a Supplemental MND to evaluate the project changes pursuant to CEQA. On September 12, 2019, the CPUC issued a decision to adopt the Supplemental MND and grant PG&E's Petition for Modification.

The 2017 MND and Supplemental MND include the adopted mitigation measures (MMs) and applicant proposed measures (APMs) that PG&E must implement as conditions of project approval, and a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with the MMs and APMs. A Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) was developed as an extension of the MMRP to provide project-specific procedures and tracking methods for monitoring and complying with all conditions of project approval.<sup>1</sup>

The MMCRP describes the Notice to Proceed (NTP) process which requires PG&E to obtain approval from the CPUC prior to initiating specific actions associated with the project. The purpose of the NTP process is to ensure all pre-construction requirements are completed adequately and the actions undertaken are consistent with the CPUC's prior decisions and environmental review requirements. Any deviation from the CPUC's prior decisions must be

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<sup>1</sup> The Supplemental MND included revisions to five MMs and the MMRP that were adopted with the 2017 MND. The MMCRP was updated in September 2019 to reflect these revisions.

authorized by the CPUC through the Minor Project Refinement (MPR) process described in the MMCRP or the Petition for Modification process (CPUC Rules of Practice and Procedure 16.4).

#### **Request and Approval of NTP #4**

On September 12, 2019, PG&E submitted NTP #4 requesting CPUC authorization to begin all project activities in the Southern Segment of the project, as described in the 2017 Final MND and Supplemental MND. Project activities are scheduled to commence on September 17, 2019 and are anticipated to be completed by March 2020. A copy of the NTP request letter is included as Attachment 1.<sup>2</sup>

The CPUC reviewed PG&E's request for NTP #4 and found that all the pre-construction requirements necessary to initiate the requested actions are complete. The CPUC approved PG&E's request for NTP #4 with standard and specific conditions identified in the last section of this letter. The results of the CPUC's review and the status of applicable pre-construction requirements, including updated requirement summary tables from the MMCRP, are provided in Attachment 2. Actions that have been reviewed and approved by the CPUC are summarized below.

#### **Actions Reviewed and Approved in NTP #4**

This NTP authorizes PG&E to initiate all remaining project activities described in the 2017 Final MND and Supplemental MND for the Southern Segment, including activities associated with Fulton Substation, Pull Site (PS)-1, PS-2, PS-3, PS-5, Helicopter Landing Zone (LZ)-1, LZ-2, Staging Area (SA)-1, SA-2, Poles 1-22, and associated access roads. Actions that were reviewed and authorized in this NTP include:

- Clearing vegetation and grading, installing gravel, and installing water crossings
- Installing erosion and sediment controls
- Installing construction fencing and trailers
- Storing vehicles, materials, and equipment
- Helicopter landing and transport operations
- Removing existing poles and installing new poles
- Removing or transferring existing conductor and installing new conductor

#### **Actions Reviewed and Approved in Previous NTPs**

The CPUC's approval of NTP #1 authorized initial site development and staging area activities at LZ-3 and LZ-5, and the associated access roads. The CPUC's approval of NTP #2 authorized all project activities associated with Fitch Mountain Substation, LZ-6, PS-10, PS-12, Poles 62-109, the TAP Staging Area, and the associated access roads. The CPUC's approval of NTP #3

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<sup>2</sup> Some of the materials typically included with NTP request packages were previously reviewed and approved by CPUC, and therefore were not included in this NTP request.

authorized all project activities associated with PS-6, PS-7, PS-9, LZ-4, Poles 23-61, and the associated access roads.

### **Actions Pending NTP Review and Approval**

No additional NTPs are anticipated. If any additional actions are identified that deviate from those described above, additional NTPs may be required unless otherwise authorized through the MPR process.

### **Conditions of Approval**

This NTP is approved with the following standard conditions:

1. PG&E shall comply with all APMs and MMs identified in the Supplemental MND; CPUC-approved plans; and other agency authorizations and permits.
2. PG&E shall comply with the adopted MMRP and project-specific procedures identified in the MMCRP.
3. PG&E shall not deviate from the CPUC-approved project as defined in the 2017 MND and Supplemental MND or otherwise authorized by the CPUC through the procedures described in the MMCRP.
4. PG&E shall obtain an NTP from the CPUC prior to initiating any actions that are not specifically authorized in this or previous NTPs.

This NTP is also approved contingent upon the following specific conditions:

5. **Federal Aviation Administration (FAA) Congested Area Plan for External Helicopter Loads.** PG&E shall complete either of the following criteria at least 30 days prior to conducting helicopter activities in the Southern Segment:
  - a. Provide the CPUC with a Congested Area Plan that has been reviewed and approved by the FAA for the helicopter activities that would be undertaken; or
  - b. Provide the CPUC written confirmation from the FAA that a Congested Area Plan would not be required for the helicopter activities that would be undertaken.
6. **California Department of Transportation (Caltrans) Transportation Permit.** PG&E shall provide the CPUC with a Caltrans transportation permit prior to transporting oversized equipment on State highways that would be used during pole replacement (i.e., cranes).
7. **Sonoma County Encroachment Permit.** PG&E shall provide the CPUC with a Sonoma County encroachment permit prior to beginning work within County roadways, including any lane or road closures.
8. **Sonoma County Transportation Permit.** PG&E shall provide the CPUC with a Sonoma County transportation permit prior to transporting oversized equipment on county roadways that would be used during pole replacement (i.e., cranes).
9. **Dust and Noise Public Signage.** PG&E shall install a publicly visible sign at work areas where grading/blading and helicopter activities occur near public and residential areas prior to grading/blading and helicopter activities.
10. **Helicopter Noise Public Notification.** Noise-sensitive receptors within 500 feet of any location where helicopter activities may occur, including flight paths if

applicable, shall be provided written notice at least 30 days prior to beginning helicopter activities. PG&E shall inform the CPUC when such notices are delivered and provide copies to the CPUC.

11. **Park Trail Closure Signage.** PG&E shall post signs at park and trail entrances at least one week in advance of park or trail closures.
12. **Pending Surveys and Response.** Immediately prior to initiating work activities at each project site, PG&E shall conduct all remaining pre-construction surveys and clearances as specified in applicable APMs, MMs, and permits. Pending pre-construction surveys are required for the following resources (refer to Table 4 in Attachment 2):
  - c. California tiger salamander
  - d. American badger
  - e. Western pond turtle
  - f. California red-legged frog (CRLF)
  - g. Foothill yellow-legged frog (FYLF)
  - h. Nesting birds
  - i. Special-status and protected bats. An acoustic emergence survey must be completed, and the results reported to CPUC, prior to impacting suitable roosts during the breeding season.
  - j. Vegetation infected with Sudden Oak Death

Please direct any questions related to this NTP to me at 415-703-1966 or [lisa.orsaba@cpuc.ca.gov](mailto:lisa.orsaba@cpuc.ca.gov).

Sincerely,



Lisa Orsaba

Project Manager  
Energy Division, CEQA Unit

cc:

Jo Lynn Lambert, PG&E Attorney

Aaron Lui, Project Manager, Panorama Environmental, Inc.

Attachment 1: PG&E Request for NTP #4

Attachment 2: CPUC Review of Pre-Construction Requirements for NTP #4

9/12/2019

Lonn Maier/Lisa Orsaba  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Subject: Fulton-Fitch Mountain 60kV Reconductoring  
Subject to Project Petition to Modify D.17-12-012  
Notice to Proceed Request No. 4 (NTP #4) – Replacement of 21 tubular steel poles and  
approximately 1.4 miles of conductor**

Dear Mr. Maier/Ms. Orsaba,

On December 18, 2017, the California Public Utilities Commission (CPUC) issued Decision D1712012, granting Pacific Gas and Electric Company (PG&E) a Permit to Construct the Fulton-Fitch Mountain 60kV Reconductoring Project (project) (Application A.15-12-005) pursuant to General Order 131-D. The CPUC Decision adopted the Final Mitigated Negative Declaration (MND), released in October 2017, in its entirety. The Final MND includes a Mitigation Monitoring, Compliance and Reporting Plan (MMCRP), and the CPUC adopted the MMCRP as part of its approval of the project. Petition for Modification of Decision 17-12-012 (A.15-12-005) was granted on September 12, 2019

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|---|--|
| <b>NTP Request Number:</b>                              | 4  |
| <b>Date Submitted to CPUC:</b>                          | 9/12/19  |
| <b>Requested Approval Date:</b>                         | 9/16/19  |
| <b>Anticipated Start/End Date for Proposed Actions:</b> | This NTP request is for replacement of 21 tubular steel poles and approximately 1.4 miles of conductor, scheduled to commence on September 17, 2019. Work is anticipated to be complete by March 1, 2020 |

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| <b>Description of the proposed actions requested in the NTP:</b>  |
| PG&E requests that the CPUC issue a Notice to Proceed (NTP #4) for replacement of 21 tubular steel poles and approximately 1.4 miles of conductor located between Fulton Substation and Shiloh Ranch Regional Park as described in the Supplemental Initial Study/Mitigated Negative Declaration (State Clearinghouse No. 2017072049)   |
| <b>Summary of previously authorized actions (if applicable) as detailed in NTP Authorization Letters:</b>   |
| NTP Authorization Letter #1, Staging Areas LZ-3 (Shiloh Road) and LZ-5 (Windsor Oaks), approved June 18, 2018. NTP Authorization Letter #2, Fitch Substation, TAP Staging Area, LZ-6, PS-12, PS-10, Poles 62-109, and associated access routes, approved July 20, 2018, NTP Authorization Letter #3, PS-6, PS-7, PS-9, LZ-4, Poles 23-61, and associated access routes, approved August 22, 2018. |
| <b>Summary of actions that have not been proposed or authorized that must be included with future NTP requests:</b>   |
| None.   |
| <b>Summary of outstanding requirements and documentation not included with the NTP package, and the anticipated dates it will be provided:</b>  |
| None.   |

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| <b>Minor Project Refinements or Temporary Extra Workspace related to the proposed actions:</b> |
| None.  |
| <b>List of Attachments:</b>  |
| None.  |

# FULTON-FITCH MOUNTAIN RECONDUCTING PROJECT

Review of Pre-construction Requirements for NTP #4

**Updated: September 16, 2019**

REQUIREMENT TRACKING TABLES

Table 1 Permits and Authorizations Tracking

| Permit/Authorization                                       | Purpose and Authority  | Requirement Sources  | Timing and Submittal Requirements   | Review/Coordination <sup>a</sup>      |   | Status  |
|--|--|--|---|---------------------------------------|---|---|
|  |  |  |   | Submitted                             | Approved  |   |
| <b>Required Prior to All Construction Activities</b>       |  |  |   |                                       |   |   |
| CPUC Permit to Construct (PTC)                             | CPUC authorization to construct the project<br><i>CPUC General Order (GO) 131-D, Section III.B</i>   | MMCRP  | PG&E obtained a PTC from CPUC (as issued through the CPUC Proceeding Decision).   | CPUC:<br>12/3/15                      | CPUC:<br>12/14/17;<br>4/26/18;<br>2/26/19;<br>9/12/19 | <b>Complete</b><br>On 12/14/17, the CPUC issued its Decision to grant PG&E at PTC.<br>On 1/12/18, PG&E submitted an Application for Rehearing of Decision to address language in the CPUC’s original decision regarding GO 95. PG&E’s application was denied and the original decision was amended.<br>On 2/26/19, the CPUC issued its Decision to grant PG&E’s Petition for Modification (PFM #2) regarding an alternate access road to LZ-3.<br>On 9/12/19, the CPUC issued its Decision to grant PG&E’s Petition for Modification (PFM #1) regarding additional pole replacement in the Southern Segment.  |
|  |  |  | *PG&E shall submit any requests for Minor Project Refinements (MPRs) or Petition for Modifications (PFMs), as needed, <b>prior to deviating from the CPUC-approved project.</b> | *CPUC:<br>Ongoing                     | *CPUC:<br>Ongoing                                     | <b>Ongoing</b><br>MPR #1 (Staging Area LZ-5); approved with NTP #1<br>MPR #2 (access road to LZ-3); denied<br>MPR #3 (TAP Staging Area SA-5); approved with NTP #2<br>MPR #4 (access route to Poles 27-28); withdrawn<br>MPR #5 (access route to Pole 68); denied<br>MPR #6 (turnout on access road to LZ-6); approved<br>MPR #7 (access route to PS-10); approved<br>MPR #8 (access route to Pole 74); approved<br>MPR #9 (access route from Pole 53 to Pole 54); approved<br>MPR #10 (leave gravel at LZ-6 and PS-12); approved<br>MPR #11 (underground distribution feeder line); withdrawn<br>MPR #12 (alternate LZ north of LZ-3); approved<br>MPR #13 (access route from Faught Rd to Pole 21); withdrawn |
| State Water Resources Control Board (SWRCB) General Permit | Permit for discharging stormwater associated with construction and land disturbance activities of one acre or more<br><i>Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ</i><br>The General NPDES Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Table C-2) | MM Hydrology-1: SWPPP Development and Implementation<br>MM Hydrology-2: SWPPP Monitoring Program | PG&E shall submit Permit Registration Documents (PRDs) (e.g., Notice of Intent [NOI], etc.) <b>once obtained from the SWRCB.</b>  | SWRCB:<br>6/25/18<br>CPUC:<br>6/27/18 | SWRCB:<br>6/25/18<br>CPUC: 6/27/18                    | <b>Complete</b>   |
|  |  |  | PG&E shall submit all Notice of Termination (NOT) forms to CPUC <b>once SWPPP requirements have been met and permit coverage has ended.</b>                                     | SWRCB:<br>Pending<br>CPUC:<br>Pending | SWRCB:<br>Pending<br>CPUC:<br>Pending                 | <b>Pending</b><br>The pending requirements are not applicable to NTP #4.  |
| <b>Required Prior to Specific Construction Activities</b>  |  |  |   |                                       |   |   |



REQUIREMENT TRACKING TABLES

| Permit/Authorization   | Purpose and Authority  | Requirement Sources   | Timing and Submittal Requirements  | Review/Coordination <sup>a</sup>                       |  | Status  |
|--|--|---|--|--|--|---|
|  |  |   |  | Submitted  | Approved   |   |
| <b>Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration</b> | Regulations apply to poles and conductor over 200 feet in height above ground level or within certain proximities to local airports<br><i>Federal Aviation Regulations (FAR) and Code of Federal Regulations (CFR) Part 77</i>       | Consistency with impact analysis in IS/MND                                    | An initial Notice (Form 7460) and FAA determination were completed.<br>PG&E shall submit a final Notice to FAA and provide a copy of the Notice and FAA determination to CPUC once obtained. | <b>FAA:</b><br>2/6/18<br><b>CPUC:</b><br>2/8/18        | <b>FAA:</b> 2/6/18<br><b>CPUC:</b> 2/8/18                  | <b>Partially Complete</b><br>FAA determination of no hazard is complete for the poles identified in the Final IS/MND and the Supplemental MND. Filing of FAA Form 7460-2, Part 2 pending for Southern Segment poles (due within 5 days after construction reaches its greatest height). Additional FAA notification would be required if major pole changes occur.<br>The pending requirements are not applicable to NTP #4.  |
| <b>FAA Congested Area Plan for External Helicopter Loads</b>                               | Regulations for carrying external helicopter loads in congested areas (e.g., residential areas)<br><i>Title 14 Code of Federal Regulations (CFR) Part 133</i>  | MM Traffic-2: Overhead Construction Safety                                    | PG&E shall submit the Plan for FAA approval <b>prior to conducting helicopter activity in congested areas</b> , and submit a copy of the approved plan to CPUC.                              | <b>FAA:</b><br>Pending<br><b>CPUC:</b><br>Pending      | <b>FAA:</b> Pending<br><b>CPUC:</b> N/A                    | <b>Pending – Condition of Approval #5</b><br>PG&E shall complete either of the following at least 30 days prior to conducting helicopter activities in the Southern Segment:<br>(a) Provide the CPUC a Congested Area Plan for the helicopter activities that would be undertaken that has been reviewed and approved by the FAA; or<br>(b) Provide the CPUC written confirmation from the FAA that a Congested Area Plan would not be required for the helicopter activities that would be undertaken. |
| <b>California Department of Transportation (Caltrans) Standard Encroachment Permit</b>     | Use of California state highways for purposes other than normal transportation, including construction activities completed within the Caltrans right-of-way (ROW)<br><i>Section 660 of the California Streets and Highways Code</i> | MM Traffic-1: Construction Traffic Management<br>MM Traffic-3: Roadway Damage | PG&E shall acquire the permit and provide a copy to CPUC <b>prior to work within the US 101 ROW.</b>   | <b>Caltrans:</b><br>Pending<br><b>CPUC:</b><br>Pending | <b>Caltrans:</b><br>Pending<br><b>CPUC:</b> N/A<br>Pending | <b>Complete</b><br>PG&E submitted an encroachment to the CPUC on August 20, 2019 covering temporary traffic control, temporary netting installation, and replacement of 60 and 230 kV overhead electrical conductors within the US 101 ROW. The permit expires 4/30/20.   |
| <b>Caltrans Transportation Permit</b>  | Movement of oversized or excessive load vehicles on the state transportation network<br><i>California Vehicle Code</i>   | MM Traffic-1: Construction Traffic Management<br>MM Traffic-3: Roadway Damage | PG&E shall acquire the permit and provide a copy to CPUC <b>prior to transportation of oversized equipment on the state transportation network.</b>  | <b>Caltrans:</b><br>N/A<br><b>CPUC:</b><br>9/3/19      | <b>Caltrans:</b><br>4/10/19<br><b>CPUC:</b> N/A            | <b>Partially Complete – Condition of Approval #6</b><br>PG&E shall provide the CPUC with a Caltrans transportation permit prior to transporting oversized equipment on State highways that would be used during pole replacement (i.e., cranes).<br>On 9/3/19, PG&E provided a permit for equipment that would be used by the civil contractor (Outback Construction, Inc.) during pole foundation installation was provided. The permit expires on 4/9/20.   |
| <b>Sonoma County Building Permit</b>   | Constructing structures associated with the Fitch Mountain Substation<br><i>Sonoma County Code of Ordinances, Chapter 7 Building Regulations, Section 7-5</i>  | MMCRP   | PG&E shall acquire the permit and provide copy to CPUC <b>prior to constructing the Fitch Mountain Substation.</b>   | <b>County:</b><br>Pending<br><b>CPUC:</b><br>Pending   | <b>County:</b><br>Pending<br><b>CPUC:</b> N/A              | <b>Complete</b><br>Permit expires 12/9/21   |
| <b>Sonoma County Encroachment Permit</b>   | Construction activities within Sonoma County roadways not covered by existing franchise agreements<br><i>Sonoma County Code of Ordinances, Chapter 7 Building Regulations, Article III</i>   | MM Traffic-1: Construction Traffic Management<br>MM Traffic-3: Roadway Damage | PG&E shall acquire the permit and provide a copy to CPUC <b>prior to work within County roadways.</b>  | <b>County:</b><br>N/A<br><b>CPUC:</b><br>7/20/18       | <b>County:</b><br>7/20/18<br><b>CPUC:</b> N/A              | <b>Partially Complete – Condition of Approval #7</b><br>PG&E shall provide the CPUC a Sonoma County encroachment permit prior to beginning work within County roadways, including implementing any lane or road closures.<br>On 7/20/18, an encroachment permit was provided for work associated with the TAP staging area in the Northern Segment.   |

REQUIREMENT TRACKING TABLES

| Permit/Authorization  | Purpose and Authority  | Requirement Sources   | Timing and Submittal Requirements  | Review/Coordination <sup>a</sup>           |  | Status  |
|---|--|---|--|--|--|---|
|   |  |   |  | Submitted                                  | Approved                                   |   |
| <b>Sonoma County Transportation Permit</b>  | Movement of oversized or excessive load vehicles on the County transportation network<br><i>Sonoma County Code of Ordinances, Chapter 15 Highways, Roads and Bridges, Article II</i> | MM Traffic-1: Construction Traffic Management<br>MM Traffic-3: Roadway Damage   | PG&E shall acquire the permit and provide a copy to CPUC <b>prior to transportation of oversized equipment on the County transportation network.</b>                       | <b>County:</b> N/A<br><b>CPUC:</b> 9/10/19 | <b>County:</b> 9/10/19<br><b>CPUC:</b> N/A | <b>Partially Complete – Condition of Approval #8</b><br>PG&E shall provide the CPUC a Sonoma County transportation permit prior to transporting oversized equipment on county roadways that would be used during pole replacement (i.e., cranes).<br>On 9/10/19, PG&E provided a permit for equipment that would be used by the civil contractor (Outback Construction, Inc.) during pole foundation installation was provided. The permit expires on 9/10/20.  |
| <b>Required Following Specific Discoveries/Determinations</b>                                     |  |   |  |  |  |   |
| <b>*United States (U.S.) Army Corps of Engineers (USACE) Section 404 Nationwide Permit</b>        | Work in waters of the U.S., including wetlands<br><i>Section 404 of the Clean Water Act</i>  | MM Biology-11: Wetland Mitigation<br>MM Hydrology-4: Watercourse Avoidance and Crossing Plan                              | *PG&E shall acquire a permit and provide a copy to CPUC <b>prior to impacting waters of the U.S., including wetlands.</b>  | <b>*USACE:</b> TBD<br><b>*CPUC:</b> TBD    | <b>*USACE:</b> TBD<br><b>*CPUC:</b> N/A    | <b>Complete</b><br>PG&E conducted a field review of potential wetland at PS-2 on 8/26/19 and determined no jurisdictional wetland is present. PG&E submitted a wetland delineation report to CPUC on 9/5/19.<br>Impacts to jurisdictional water features associated with the Southern Segment were originally planned to be avoided and permitting requirements were not anticipated. PG&E would be required to obtain the necessary permits if any impact to a jurisdictional water feature cannot be avoided.   |
| <b>*U.S. Fish and Wildlife Service (USFWS) Section 10 Incidental Take Permit</b>                  | Regulates impacts on federally-listed, threatened, or endangered plants and animals, and the habitats upon which they depend.<br><i>Section 10 of the Endangered Species Act</i>     | AMP BIO-7: California Tiger Salamander<br>MM Biology-2: Special-status Plants<br>MM Biology-3: California Red-legged Frog | *PG&E shall acquire permits and provide copies to CPUC <b>prior to any incidental take of federally-listed species or federally-protected habitat.</b>                     | <b>*USACE:</b> TBD<br><b>*CPUC:</b> TBD    | <b>*USFWS:</b> TBD<br><b>*CPUC:</b> N/A    | <b>Complete</b><br>On August 15, 2019 PG&E reported that they would use their Bay Area Habitat Conservation Plan (BAHCP) for take coverage of California tiger salamander (CTS). Impacts to modeled CTS habitat would be mitigated as specified in the BAHCP. Field Protocols 1 to 18 from the BAHCP would also be implemented in conjunction with required APMs and MMs. If other federally listed species will be impacted (i.e., California red-legged frog or federally listed plants), PG&E would either use the BAHCP for covered species or obtain a separate take permit from USFWS, as necessary. This approach was confirmed with USFWS on August 22, 2019. |
| <b>*RWQCB Section 401 Water Quality Certification</b>   | Consistency with state water quality standards, prior to issuance of a USACE Section 404 Permit.<br><i>Section 401 of the Clean Water Act</i>  | MM Biology-11: Wetland Mitigation<br>MM Hydrology-4: Watercourse Avoidance and Crossing Plan                              | *PG&E shall obtain a 401 Permit prior to obtaining a Section 404 Permit from USACE, and provide a copy of the permits to CPUC <b>prior to impacting waters of the U.S.</b> | <b>*RWQCB:</b> TBD<br><b>*CPUC:</b> TBD    | <b>*RWQCB:</b> TBD<br><b>*CPUC:</b> N/A    | <b>Complete</b><br>PG&E conducted a field review of potential wetland at PS-2 on 8/26/19 and determined no jurisdictional wetland is present. PG&E submitted a wetland delineation report to CPUC on 9/5/19.<br>Impacts to jurisdictional water features associated with the Southern Segment were originally planned to be avoided and permitting requirements were not anticipated. PG&E would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.   |
| <b>*California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreement</b> | Regulates activities that affect waters of the state, including the bed or bank of such features<br><i>Fish and Game Code Section 1602</i>   | MM Hydrology-4: Watercourse Avoidance and Crossing Plan   | *PG&E shall acquire any permit and provide a copy to CPUC <b>prior to impacting waters of the state.</b>   | <b>*CDFW:</b> TBD<br><b>*CPUC:</b> TBD     | <b>*CDFW:</b> TBD<br><b>*CPUC:</b> N/A     | <b>Complete</b><br>PG&E conducted a field review of potential wetland at PS-2 on 8/26/19 and determined no jurisdictional wetland is present. PG&E submitted a wetland delineation report to CPUC on 9/5/19.<br>Impacts to jurisdictional water features associated with the Southern Segment were originally planned to be avoided and permitting requirements were not anticipated. PG&E would be required to obtain the necessary permits if any impact to a jurisdictional water feature becomes anticipated.   |

REQUIREMENT TRACKING TABLES

| Permit/Authorization  | Purpose and Authority  | Requirement Sources  | Timing and Submittal Requirements  | Review/Coordination <sup>a</sup>   |                                | Status   |
|---|--|--|--|------------------------------------|--------------------------------|--|
|   |  |  |  | Submitted                          | Approved                       |  |
| <b>*CDFW Section 2081(b) Incidental Take Permits or Consistency Determination</b> | Impacts on state-listed, threatened, or endangered species, and the habitats upon which they depend<br><i>Fish and Game Code Section 2081(b)</i> | AMP BIO-7: California Tiger Salamander<br>APM BIO-8: American Badger<br>APM BIO-9: Western Pond Turtle<br>MM Biology-2: Special-status Plants<br>MM Biology-4: Foothill Yellow-legged Frog<br>MM Biology-5: Special-status and Protected Migratory Birds | *PG&E shall acquire any permits and provide copies to CPUC <b>prior to any incidental take of state-listed species or state-protected habitat.</b> | *CDFW: TBD<br>*CPUC: TBD           | *CDFW: TBD<br>*CPUC: N/A       | <b>TBD</b><br>No special-status species have been identified in project areas to date. PG&E would be required to obtain the necessary permits if special-status species are discovered during pre-construction surveys or during construction. |
| <b>*Sonoma County culvert design approval</b>                                     | Requirements regarding the design of culverts that could impede flood water<br><i>Sonoma County Flood Control Design Criteria</i>                | MM Hydrology-5: Culvert Design   | PG&E shall acquire the permit and provide a copy to CPUC <b>prior to modifying or installing culverts.</b>   | *County: Pending<br>*CPUC: Pending | *County: Pending<br>*CPUC: N/A | <b>TBD</b><br>No culvert installation or replacement is anticipated.   |

Notes:  
<sup>a</sup> All project permits, and authorizations provided by other agencies, must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of project permits and authorizations, if necessary.  
 \* Requirements marked with an asterisk are only applicable under specified conditions.

Table 2 Plans Tracking

| Plan   | Requirement Sources  | Timing and Submittal Requirements   | Review/Coordination <sup>a</sup> |               | Status   |
|--|--|---|----------------------------------|---------------|--|
|  |  |   | Submitted                        | Approved      |  |
| <b>Required Prior to All Construction Activities</b>   |  |   |                                  |               |  |
| <b>Worker Environmental Awareness Program (WEAP) Training Materials (also referred to as the Environmental Training Program [ETP])</b> | APM BIO-1a: Environmental Awareness Training<br>MM Biology-10: Sudden Oak Death Procedures<br>MM Cultural-2: Cultural Resource Training<br>MM Hazards-1: Hazardous Materials Procedures and Worker Training<br>MM Hazards-2: Construction Fire Prevention Plan<br>APM PAL-2: Worker Environmental Awareness Training | PG&E shall submit all ETP materials to CPUC for review and approval <b>no less than 30 days before construction.</b>  | CPUC: 5/30/18                    | CPUC: 6/8/18  | <b>Complete</b><br>CPUC approved the supervisor level training presentation (Tracking #WT-01.2). A supervisor-level WEAP training is scheduled for 9/16/19.<br>PG&E provided updated worker training brochures to CPUC on 9/12/19. |
| <b>Revegetation, Restoration, and Monitoring Plan</b>  | MM Biology-7: Revegetation, Restoration, and Monitoring Plan   | PG&E shall submit the plan to the CPUC for review and approval <b>no less than 60 days before construction.</b>   | CPUC: 3/5/18                     | CPUC: 6/13/18 | <b>Complete</b><br>Tracking #P-01.2.   |
| <b>Stormwater Pollution Prevention Plan (SWPPP)</b>  | MM Hazards-1: Hazardous Materials Procedures and Worker Training<br>MM Hydrology-1: SWPPP Development and Implementation<br>MM Hydrology-2: SWPPP Monitoring Program   | A Qualified SWPPP Developer (QSD) shall prepare a SWPPP for the project in accordance with the SWRCB General Permit (refer to Table C-1). PG&E shall submit the SWPPP to the CPUC for review and comment <b>no less than 30 days prior to construction.</b> | CPUC: 5/8/18                     | CPUC: 6/11/18 | <b>Complete</b><br>Tracking #P-04.3<br>The current SWPPP provides coverage until January 31, 2020.   |

**REQUIREMENT TRACKING TABLES**

| Plan  | Requirement Sources  | Timing and Submittal Requirements  | Review/Coordination <sup>a</sup>                              |   | Status   |
|---|--|--|---|---|--|
|   |  |  | Submitted   | Approved  |  |
| <b>Required Prior to Specific Construction Activities</b>     |  |  |   |   |  |
| <b>Construction Fire Prevention Plan (CFPP)</b>               | MM Hazards-2: Construction Fire Prevention Plan  | PG&E shall submit the plan to CPUC for review and approval <b>at least 30 days prior to construction within the Northern Segment.</b>  | <b>CPUC:</b> 4/20/18  | <b>CPUC:</b> 6/14/18  | <b>Complete</b><br>PG&E revised the CFPP at the CPUC's request. The updated CFPP was provided to CPUC and finalized on 9/11/19.  |
| <b>Watercourse Avoidance and Crossing Plan</b>                | MM Biology-11: Wetland Mitigation<br>MM Hydrology-1: SWPPP Development and Implementation<br>MM Hydrology-4: Watercourse Avoidance and Crossing Plan | PG&E shall prepare a Seasonal Watercourse Avoidance and Crossing Plan and submit the plan to the CPUC <b>no less than 60 days prior to use or construction of surface water crossings or work within 50 feet of surface water resources.</b>   | <b>CPUC:</b> 4/20/18  | <b>CPUC:</b> 7/19/18  | <b>Complete</b><br>Tracking #P-03.2<br>PG&E provided updated mapping to address the newly identified water crossing by Pole 21 on 9/3/19.<br>PG&E conducted a field review of potential wetland at PS-2 on 8/26/19 and determined no jurisdictional wetland is present. PG&E submitted a wetland delineation report to CPUC on 9/5/19. |
| <b>Required Following Specific Discoveries/Determinations</b> |  |  |   |   |  |
| <b>*Special-status Plant Salvage and Replanting Plan</b>      | MM Biology-2: Special-status Plants  | *If impacts on the special-status plant species cannot be avoided and if impacts would be substantial, as determined by the CPUC, PG&E shall prepare and implement a Special-status Plant Salvage and Replanting Plan. PG&E shall submit the plan to the CPUC for review and approval <b>no less than 30 days prior to impacting or collecting special-status plants.</b> If CPUC determines that the Salvage and Replanting Plan is not likely to be, then either (1) impacts on the special-status plants in questions must be avoided, or (2) a financial contribution will be made to an organization that restores/protects special-status plant populations in the project region. | <b>*CPUC:</b> 9/11/19   | <b>*CPUC:</b> 9/11/19   | <b>Complete</b><br>Surveys for special-status plants were completed in 2016 and 2017. No special-status plants were identified.<br>PG&E conducted a supplemental special-status plant survey within grassland and woodland habitats in the Southern Segment in June 2019. No special-status plants were identified.                    |
| <b>*Wetland Creation/Enhancement Plan</b>                     | MM Biology-11: Wetland Mitigation  | *If wetlands wetland creation/enhancement is necessary, PG&E shall prepare and submit a plan to the CPUC, USACE and RWQCB for review and approval <b>prior to impacting any wetlands.</b>  | <b>*USACE:</b> TBD<br><b>*RWQCB:</b> TBD<br><b>*CPUC:</b> TBD | <b>*USACE:</b> TBD<br><b>*RWQCB:</b> TBD<br><b>*CPUC:</b> TBD | <b>TBD</b><br>PG&E conducted a field review of potential wetland at PS-2 on 8/26/19 and determined no jurisdictional wetland is present. PG&E submitted a wetland delineation report to CPUC on 9/5/19.<br>To date, no other wetlands are located within project areas and no other potential impacts are anticipated.                 |
| <b>*Research and Data Recovery Plan</b>                       | MM Cultural-4: Data Recovery   | *If CRHR-eligible, unique archaeological, or tribal cultural resource data recovery occurs, PG&E shall prepare a Research and Data Recovery Plan for each individual site where data recovery is necessary. The plans shall be submitted to the CPUC for approval <b>prior to conducting data recovery procedures for each site.</b>   | <b>*CPUC:</b> TBD   | <b>*CPUC:</b> TBD   | <b>TBD</b><br>To date, data recovery has not been proposed for any cultural site and all potentially eligible sites would be avoided.  |

REQUIREMENT TRACKING TABLES

| Plan | Requirement Sources | Timing and Submittal Requirements | Review/Coordination <sup>a</sup> |          | Status |
|------|---------------------|-----------------------------------|----------------------------------|----------|--------|
|      |                     |                                   | Submitted                        | Approved |        |

Notes:

<sup>a</sup> All project Plans required by other agencies must be submitted to CPUC. CPUC reserves the right to review and comment on the accuracy and adequacy of all project Plans, if necessary.

\* Requirements marked with an asterisk are only applicable under specified conditions.

Table 3 Notifications Tracking

| Notification  | Entities to Notify   | Requirement Sources  | Timing and Submittal Requirements   | Review/Coordination <sup>a</sup> |               | Status  |
|---|--|--|---|----------------------------------|---------------|---|
|   |  |  |   | Submitted                        | Approved      |   |
| <b>Required Prior to All Construction Activities</b>      |  |  |   |                                  |               |   |
| Post signs with dust complaint information                | Public   | APM AIR-1: Fugitive Dust Emissions<br>MM Noise-1: General Construction Noise | PG&E shall install a publicly visible sign at work areas where grading/blading and helicopter activities occur near public and residential areas <b>prior to grading/blading and helicopter activities.</b>                                 | CPUC: 1/24/18                    | CPUC: 1/24/18 | <b>Pending – Condition of Approval #9</b><br>The draft signs were approved by CPUC. Signs must be posted immediately prior to the initiation of work where grading/blading and helicopter activities occur near public and residential areas.   |
| <b>Required Prior to Specific Construction Activities</b> |  |  |   |                                  |               |   |
| General construction noise disturbance                    | All noise-sensitive receptors within 500 feet of work areas  | MM Noise-1: General Construction Noise                                       | Noise-sensitive receptors within 500 feet of work areas shall be provided written notice <b>at least 7 days prior to beginning construction.</b>  | CPUC: 5/17/18                    | CPUC: 5/17/18 | <b>Complete</b><br>Tracking #N-01.1; notification letters for the Northern Segment sent 5/18/18<br>Tracking #N-03; notification letters for the Southern Segment sent 8/26/19   |
| Helicopter noise disturbance                              | School administrators for Mark West Elementary School and San Miguel Elementary School             | MM Noise-2: Schools  | <b>Prior to helicopter activities within 500 feet of schools</b> , PG&E shall coordinate with school administrators to determine the schedule for noise-sensitive periods that must be avoided during helicopter operation within 500 feet. | CPUC: Pending                    | CPUC: N/A     | <b>Complete</b><br>Based on information from PG&E, the only helicopter work area within 500 feet of a school (Mark West Charter) would be LZ-1. On August 22, 2019 PG&E confirmed they would either schedule helicopter activities at LZ-1 when school was not in session or obtain written approval from the school's administrators per MM Noise-2. |
| Helicopter noise disturbance                              | All noise-sensitive receptors within 500 feet of any location where helicopter activity will occur | MM Noise-3: Helicopter Activities  | Noise-sensitive receptors within 500 feet from any location where helicopter activities may occur, including flight paths if applicable, shall be provided written notice <b>at least 30 days prior to beginning helicopter activities.</b> | CPUC: 5/17/18                    | CPUC: 5/17/18 | <b>Pending – Condition of Approval #10</b><br>PG&E shall notify sensitive receptors at least 30 days prior to beginning helicopter activities for the Southern Segment.<br>Tracking #N-01.1; notification letters for the Northern Segment sent 5/18/18   |

REQUIREMENT TRACKING TABLES

| Notification                             | Entities to Notify   | Requirement Sources  | Timing and Submittal Requirements  | Review/Coordination <sup>a</sup>             |                                      | Status  |
|--|--|--|--|--|--------------------------------------|---|
|  |  |  |  | Submitted                                    | Approved                             |   |
| Construction activities within parks     | Sonoma County park officials and park users for Maddux Ranch Regional Park, Shiloh Ranch Regional Park, and Foothill Regional Park       | APM REC-1: Coordination with Park Management and Signage<br>MM Recreation-2: Trail Detours and Notifications | PG&E shall post signs at park and trail entrances <b>at least 1 week in advance of parks or trail closures.</b><br>PG&E shall coordinate with county officials regarding park and trail closures and detours <b>at least 90 days prior to such closures.</b> | County: Pending<br>CPUC: Pending             | County: Pending<br>CPUC: N/A         | <b>Pending – Condition of Approval #11</b>  |
| Emergency access disruption              | Local emergency service providers (i.e., local fire districts, law enforcement offices, hospitals, and ambulance and paramedic services) | MM Traffic-4: Emergency Access   | PG&E shall notify local emergency service providers <b>no less than 1 week before construction activities.</b>   | Emergency Services: Pending<br>CPUC: Pending | Emergency Services: N/A<br>CPUC: N/A | <b>Complete</b><br>PG&E notified the Sonoma County Sheriff's Office on 9/5/19, Sonoma County Fire Department (sometime before 9/11/19), and Sutter Santa Rosa Regional Hospital on 9/12/19. |
| Affected public transit routes and stops | Sonoma County Transit (SCT)  | MM Traffic-5: Public Transit   | PG&E shall notify SCT <b>no less than 30 days before construction in the Southern Segment</b> and identify roadway segments where bus routes and bus stops are located that may be affected during construction.   | SCT: Pending<br>CPUC: Pending                | SCT: N/A<br>CPUC: N/A                | <b>Complete</b><br>PG&E notified Sonoma County Transit on 8/28/19.  |

## REQUIREMENT TRACKING TABLES

**Table 4 Pre-construction Survey Tracking**

| Resource/Topic                     | Requirement Sources  | Status   |
|------------------------------------|--|--|
| California tiger salamander        | APM BIO-7: California Tiger Salamander<br>Santa Rosa Plain Conservation Strategy (SRPCS) | <b>Partially Complete – Condition of Approval #12a-c</b><br>Pre-construction wildlife surveys are required immediately prior to work activities in each new area.  |
| American badger                    | APM BIO-8: American Badger   |  |
| Western pond turtle                | APM BIO-9: Western Pond Turtle   |  |
| Special-status plants              | MM Biology-2: Special-status Plants  | <b>Complete</b><br>Surveys for special-status plants were completed in 2016 and 2017. No special-status plants were identified.<br>PG&E conducted a supplemental special-status plant survey within grassland and woodland habitats in the Southern Segment in June 2019. No special-status plants were identified.  |
| California red-legged frog (CRLF)  | MM Biology-3: California Red-legged Frog   | <b>Partially Complete – Condition of Approval #12d-e</b>   |
| Foothill yellow-legged frog (FYLF) | MM Biology-4: Foothill Yellow-legged Frog  | Suitable habitat for CRLF was mapped within 500 feet of current work areas for the entire project (Tracking #S-03.1).<br>PG&E identified potentially suitable aquatic, and upland habitat within 40 feet of work areas for FYLF in accordance revised mitigation in the Supplemental IS/MND.<br>Pre-construction surveys for CRLF are required immediately prior to work activities in mapped habitat. Pre-construction surveys for FYLF are required within 3 to 5 days of work activities in mapped habitat. Survey results for FYLF must be provided to CPUC prior to any ground disturbance in mapped habitat. |
| Nesting birds                      | MM Biology-5: Special-status and Protected Migratory Birds                               | <b>Partially Complete – Condition of Approval #12f</b><br>Pre-construction nesting bird surveys are required immediately prior to work activities in each new area.  |

## REQUIREMENT TRACKING TABLES

| Resource/Topic                            | Requirement Sources  | Status   |
|---|--|--|
| Special-status and protected bats         | MM Biology-6: Special-status and Protected Bats  | <p><b>Partially Complete – Condition of Approval #12g</b></p> <p>PG&amp;E completed the required bat habitat assessment for suitable roosts within 50 feet of project areas (Tracking #S-02.2). Additional habitat assessments would be required for any new work areas that may be proposed. Potential day or maternity roosts were identified in trees slated for trimming or removal in the Southern Segment. PG&amp;E shall follow the additional requirements outlined in MM Biology-6 prior to impacting potential roosts.</p> |
| Temporarily disturbed areas               | MM Biology-7: Revegetation, Restoration, and Monitoring Plan   | <p><b>Complete</b></p> <p>Tracking #P-01.2</p>   |
| Sensitive plant communities               | MM Biology-9: Sensitive Natural Plant Communities  | <p><b>Complete</b></p> <p>A pre-construction vegetation memo was submitted covering all project work areas. Sensitive natural plant communities were identified in the memo, including Oregon oak woodland and riparian woodland. Additional vegetation mapping would be required for any new work areas that may be proposed.</p>   |
| Vegetation infected with Sudden Oak Death | MM Biology-10: Sudden Oak Death Procedures   | <p><b>Partially Complete – Condition of Approval #12h</b></p> <p>All work areas must be inspected for signs of infected vegetation prior to construction.</p>  |
| Cultural resources <sup>a</sup>           | MM Cultural-3: Pre-Construction Cultural and Tribal Cultural Resource Surveys                                    | <p><b>Complete</b></p> <p>The work areas identified in the Southern Segment are within the cultural survey area shown in the Final IS/MND. No resources were identified in these areas.</p>  |
| Geotechnical investigation                | <p>APM GS-3: Site-specific Geotechnical Investigation</p> <p>MM Geology-1: Geotechnical Investigation Report</p> | <p><b>Complete</b></p> <p>PG&amp;E provided a geotechnical investigation report for the Southern Segment per PFM 1 (Kleinfelder 2019) and confirmed the recommendations in the report will be incorporated during construction.</p>  |



## REQUIREMENT TRACKING TABLES

| Resource/Topic | Requirement Sources | Status |
|----------------|---------------------|--------|
|----------------|---------------------|--------|

Notes:

<sup>a</sup> Cultural surveys were completed for all preliminary work areas identified in the IS/MND, and for a large portion of the IS/MND study area where work areas could be relocated. Cultural survey areas are shown on Figure E-1 of the Final IS/MND. Additional cultural surveys are only required if work areas or access roads are relocated to areas that were not previously surveyed, including those within the IS/MND study area.

**Table 5 Pre-construction Report Tracking**

| Report                                | Preparation/Submittal Frequency   | Requirement Sources <sup>a</sup>    | Contents   | Status  |
|---------------------------------------|---|-------------------------------------|--|---|
| Special-status Plant Survey Report(s) | Survey report(s) submitted to CPUC no less than 30 days prior to construction | MM Biology-2: Special-status Plants | Report shall identify: the botanists' names and qualifications; a description of the survey dates, methods, and a description of the survey efforts, including a list of the species that were searched for; results of the plant inventory evaluation; suitable habitat that was encountered; maps (1: 3,000 scale) that identify final project work areas and access routes; locations of suitable habitat within the project study area; the extent of focused plant surveys that cover project areas located in suitable habitat; enumeration and description of encountered special-status plant individuals or populations; and recommendations for avoiding the plants, where feasible. | <b>Complete</b><br>Surveys for special-status plants were completed in 2016 and 2017. No special-status plants were identified.<br>PG&E conducted a supplemental special-status plant survey within grassland and woodland habitats in the Southern Segment in June 2019. No special-status plants were identified. |

## REQUIREMENT TRACKING TABLES

| Report   | Preparation/Submittal Frequency  | Requirement Sources <sup>a</sup>                             | Contents   | Status  |
|--|--|--|--|---|
| Pre-Construction Report (general vegetation and habitat impacts) | Pre-Construction Report to the CPUC at least 30 days prior to construction                             | MM Biology-7: Revegetation, Restoration, and Monitoring Plan | Report shall: quantify and document anticipated impacts on vegetation resources; identify special-status plant individuals or the characteristics of populations; the types and numbers of tree and shrub individuals; restoration acreages for grassland, woodland, and forest vegetation communities; the baseline conditions for adjacent and comparable vegetation resources; maps (1: 3,000 scale) that identify the types and locations of the vegetation resources that may be impacted; the limits of the planned work areas; and project access routes. | <p><b>Complete</b></p> <p>A pre-construction vegetation memo was submitted covering all project work areas. Sensitive natural plant communities were identified in the memo, including Oregon oak woodland and riparian woodland. Additional vegetation mapping would be required for any new work areas that may be proposed.</p>  |
| Pre-Project Trail Condition Report                               | Pre-Project Trail Condition Report is submitted to the CPUC no less than 30 days prior to construction | MM Recreation-1: Trail Conditions and Repairs                | Report documents the condition of designated trails located within project work areas or access routes.  | <p><b>Complete</b></p> <p>Tracking #R-03.1</p> <p>PG&amp;E must obtain approval from CPUC prior to using any unapproved access routes through the MPR process.</p> <p>PG&amp;E must amend the Pre-Project Trail Conditions Report if access routes are proposed on any additional trails in regional parks other than those specifically addressed in the approved Pre-Project Trail Conditions Report.</p> |

## REQUIREMENT TRACKING TABLES

| Report                            | Preparation/Submittal Frequency   | Requirement Sources <sup>a</sup>  | Contents  | Status   |
|-----------------------------------|---|---|---|--|
| Geotechnical Investigation Report | Geotechnical Investigation Report is submitted to the CPUC no less than 60 days prior to construction | APM GS-3: Site-specific Geotechnical Investigation<br>MM Geology-1: Geotechnical Investigation Report | Report areas that are suspected to have unstable soils or landslide susceptibility and evaluate the potential for surface fault rupture for poles within and adjacent to potentially active fault traces and earthquake fault zones. Report shall provide site-specific recommendations for poles, work areas, and access routes where there is an elevated risk of geologic hazards. | <b>Complete</b><br>PG&E provided a geotechnical investigation report for the Southern Segment per PFM 1 (Kleinfelder 2019) and confirmed the recommendations in the report will be incorporated during construction. |