

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

February 22, 2013

Ms. Cristina Holstine
Pacific Gas and Electric Company
Land Planner, Technical and Land Services
245 Market Street, Rm. 1054A
San Francisco, CA 94105-1702

Subject: Crazy Horse Switching Station – Notice to Proceed #4

Dear Ms. Holstine:

A Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Crazy Horse Switching Station Project (Project) was adopted by the California Public Utilities Commission (CPUC) in accordance with the California Environmental Quality Act (CEQA) on June 17, 2011. The mitigation measures (MMs) and Applicant Proposed Measures (APMs) described in the IS/MND were adopted as conditions of project approval. The CPUC also adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with all APMs and MMs during project implementation. The MMCRP describes the CPUC Notice to Proceed (NTP) process, which requires PG&E to obtain an approval letter from the CPUC, authorizing project related work to proceed.

On February 12, 2013, PG&E submitted NTP Request #4 to begin installation of nesting bird visual barrier fencing (bird fencing) on the project site. This letter serves to authorize PG&E to commence work described in NTP Request #4 on a conditional basis. The conditions of approval for commencing work are described here.

NTP Request #4

PG&E proposes to begin installation of temporary bird fencing around portions of the switching station work area, to reduce potential project related disturbance to nesting birds during grading and construction of the switching station. PG&E would transport fencing materials to the project site and begin installation of the bird fencing in late February. Installation of the bird fencing would take approximately 7 days. The proposed fence locations are shown in the Request for NTP #4, included with this letter as Appendix A. The fence is proposed to be constructed in three segments and would be approximately 2,100 feet long and 12 to 15 feet high. The fence would be constructed of black visqueen (plastic) with wooden supports.

Authorization of NTP #4

This NTP authorizes PG&E to commence installation of a nesting bird visual barrier fence on the project site within the previously installed sensitive amphibian fencing, which was authorized under NTPs #1 and #2.

Areas and Actions Not Included in NTP #4

NTP #4 does not authorize any other construction activities, such as grading and cut-and-fill activities for the construction of the switching station, installation of switching station components, installation of additional towers and poles, or stringing of new overhead wires. A separate NTP, or NTPs, must be issued by the CPUC before these activities can commence.

NTP #4 Conditions of Approval

NTP #4 is approved by the CPUC with conditions. The following conditions of approval are required prior to commencement of work associated with NTP #4:

1. PG&E shall conduct pre-construction surveys as required by project APMs and MMs, and submit the results to the CPUC. The required pre-construction surveys that must be conducted prior to commencing the work described in NTP #4 are summarized in Table 1.
2. PG&E shall comply with all conditions of project permits.
3. All construction activities associated with NTP #4 shall take place within the previously installed sensitive amphibian exclusion fencing, which surrounds the switching station work area.

Pre-construction Surveys	Requirement	Schedule	NTP #4 Specifications
Nesting birds	MM Biology – 27	No more than 30 days prior to construction	Survey required within 250 feet for passerines and within 500 feet for non-listed raptors around all NTP #4 work areas.
Burrowing owl	MM Biology – 28	No more than 30 days prior to construction	Survey within 250 feet of NTP#4 work areas
Golden eagles and white-tailed kites	MM Biology – 36	No more than 30 days prior to construction	Survey required within a minimum of 1,000 feet of all NTP #4 work areas.

Nesting Bird Mitigation

Construction of a nesting bird visual barrier fence does not replace or otherwise substitute for mitigation requirements defined in the project APMs, MMs, or permit conditions. PG&E must comply fully with MM Biology-27 during construction of the fence and any future project construction activities. Specifically, MM Biology-27 requires that “in the event that work shall take place within 250 feet (500 feet for raptors) of an active nest, a biological monitor shall monitor the

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activity of the nesting birds during work to determine if construction activities are resulting in significant disturbance to the birds. If the biologist determines that work is disrupting nesting activities, then work in that area shall be halted until nesting is completed and the young have fledged."

CPUC discussed the nesting bird visual barrier with California Department of Fish and Wildlife (CDFW) on February 19, 2013. CDFW acknowledged that the presence of a nesting bird visual barrier may reduce the likelihood that future project construction activities would result in significant disturbance to nesting birds. However, the visual barrier is unlikely to reduce construction noise and associated disturbance of active nests. Active nests will need to be monitored behind the fence during future construction activities in compliance with all applicable APMs, MMs, and permit conditions.

Mitigation Measure Biology-37 requires submittal of an Avian Protection Plan (APP) to CPUC for recordkeeping prior to construction. PG&E has submitted the draft APP to USFWS and CDFW for review and is awaiting comments from USFWS. The fully reviewed APP will not be required prior to construction under NTP#4 due to the limited duration and intensity of construction for the nesting bird visual barrier. In the absence of a fully reviewed APP, PG&E shall submit the draft APP to CPUC and conduct nesting bird monitoring in accordance with MM Biology-27.

Please contact me if you have any questions.

Sincerely,



Andrew Barnsdale
CPUC Project Manager

cc: Susanne Heim, Panorama
Aaron Lui, Panorama
Janet Liver, TRC
Judi Mosley, PG&E Attorney
Nicholas Sher, CPUC

Attachments:
Appendix A – NTP#4 Request

Crazy Horse Canyon Switching Station Project

Notice to Proceed Request #4

Submitted to

California Public Utilities Commission

*Construction of a new switching station, and
reconfiguration of two existing 115 kilovolt power lines*

February 12, 2013

Prepared by

Pacific Gas and Electric Company

The Crazy Horse Canyon Switching Station Project (project) Notice to Proceed (NTP) Request #4 consists of installation of a nesting bird visual barrier fence prior to the start of construction activities.

From the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) for the project, an NTP request must include the following information:

- A description of the work
- Detailed description of the segment location, including maps, photos, and/or other supporting documents
- Verification that all relevant preconstruction mitigation measures and 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 preconstruction compliance items cannot be met prior to issuance of the NTP, a request shall be submitted that identifies the outstanding submittals, as well as how they will be met and approved in a timely manner prior to construction
- Up-to-date biological resource surveys or a commitment to survey and submission of results prior to construction
- All applicable jurisdictional permits or agency approvals (if necessary)
- Date of expected construction and duration of work

1. Work Area, Activities, and Duration

The specific activities being requested under this NTP are described as follows:

- Installation of a nesting bird visual barrier fence

The areas of work within which this activity will occur are portrayed on Attachment 1 of this NTP Request #4. The locations of the nesting bird visual barrier fence are approximate and the fence will be designed and installed as deemed necessary by PG&E to achieve its purpose.

The described work activity will begin when the NTP is received and all conditions are met. The nesting bird visual barrier fence is scheduled to be installed in mid to late February 2013 and is anticipated to take five to seven days to install.

2. Regulatory Approvals

PG&E notified the California Department of Fish and Wildlife on November 27, 2012 and January 25, 2013 regarding PG&E's intent to install the nesting bird visual barrier fence, and forwarded this correspondence to CPUC on January 28, 2013.

Table 1 summarizes the status of permit submissions to the California Public Utilities Commission (CPUC).

Table 1: Project Permits

Permit	Date Issued or Amended	Date Received by the CPUC
Section 7 consultation	November 3, 2011	March 13, 2012
Incidental Take Permit (ITP)	September 7, 2011	March 13, 2012
♦ ITP Amendment to extend expiration date beyond September 15, 2013 and extend deadline for Condition 10 (acquisition of conservation easement).	Not issued yet.	To be submitted.
Clean Water Act Section 404 Nationwide Permit	January 11, 2012	March 13, 2012
♦ Nationwide Permit re-authorization	Not issued yet.	To be submitted.
Section 401 Water Quality Certification	January 31, 2012	March 13, 2012
♦ Section 401 re-authorization	Not issued yet.	To be submitted.
Stormwater Pollution Prevention Plan; enrollment under General Construction National Pollutant Discharge Elimination System permit	February 23, 2012	March 13, 2012 August 29, 2012 (revised)
Monterey County Grading Permit	March 16, 2012	March 27, 2012

3. Preconstruction Mitigation Measures and APMs

See Attachment 2 for a status table of the Preconstruction Mitigation Measures from the MMCRP.

4. Biological Resource Surveys

Table 2 identifies the surveys to occur and associated timing to implement the Final IS/MND APMs and MMs within this NTP requested project area.

Table 2: Preconstruction Surveys

	Survey/Requirement	Reference	Timing/Requirements
1	Golden Eagle and White-tailed Kite	MM Biology-36	<u>No more than 30 days</u> prior to construction; to be conducted by a USFWS-approved biologist
2	Bird Nests	MM Biology-27	<u>No more than 30 days</u> prior to construction
3	Burrowing Owl	MM Biology-28	<u>No more than 30 days</u> prior to construction

4	California Tiger Salamander and California Red Legged Frog	MM Biology-21	<u>No more than 5 days</u> prior to any ground-disturbing activities
5	California Tiger Salamander and California Red Legged Frog	BO-AMM-S3	<u>Immediately prior</u> to construction activities
6	Special-status Plant Species	MM Biology - 17	Conduct surveys in <u>July and September</u> (if surveys not possible, use information from past surveys); flag special status plant species prior to construction
7	Bats	MM Biology-29	Conduct <u>pre-construction</u> surveys; remove trees with suitable roosting habitat prior to September 1
8	Southwestern Pond Turtle, Black Legless Lizard, and Coast Range Newt	MM Biology-34	<u>Immediately prior</u> to initiation of any ground disturbing activities within or immediately adjacent to suitable habitat; to be conducted by a qualified biologist
10	Badger	MM Biology-31	<u>Prior to construction</u>
11	Oak Trees	MM Biology-40	<u>Prior to construction</u>
12	Sensitive Resources	APM Biology-10	<u>Prior to construction</u>
13	California Tiger Salamander, California Red Legged Frog, Monterey Spineflower	BO-AMM-S1	<u>No more than 30 days</u> prior to construction
14	Special-status Amphibians and Reptiles	BO-AMM-S2	<u>No more than 2 weeks</u> prior to construction

MM = Mitigation Measure

AMM = Avoidance and Minimization Measure

ITP T&C = CDFG Incidental Take Permit Term Condition

BO = Biological Opinion (contains AMM and Terms and Conditions; G = General; S = species specific)

5. Required Plans

The CPUC has received the required plans listed below with the exception of the revised Avian Protection Plan (Mitigation Measure Biology-37), the plans and specifications for landscaping (Mitigation Measure Aesthetics-8), and Revegetation and Monitoring Plan (Mitigation Measure Biology-17) Plan.

Table 3: Required Plans

Plan	Date Received by the CPUC
Avian Protection Plan	To be submitted.
Conceptual Landscape Plan*	January 29, 2013
Revegetation and Monitoring Plan	February 5, 2013
Tree Protection Plan	September 14, 2012
Fire Prevention and Response Plan	July 23, 2012
Hazardous Substance Control and Emergency Response Plan	July 23, 2012
Health and Safety Plan	July 23, 2012
Erosion Control and Sediment Transport Plan	August 29, 2012 (part of SWPPP)
Stormwater Pollution Prevention Plan	August 29, 2012
Worker Environmental Awareness Program	July 23, 2012

* *The Conceptual Landscape Plan can be found in the PEA and the IS.MND. The detailed plans and specifications for landscaping developed per Mitigation Measure Aesthetics-8 were submitted to PG&E on January 29, 2013.*

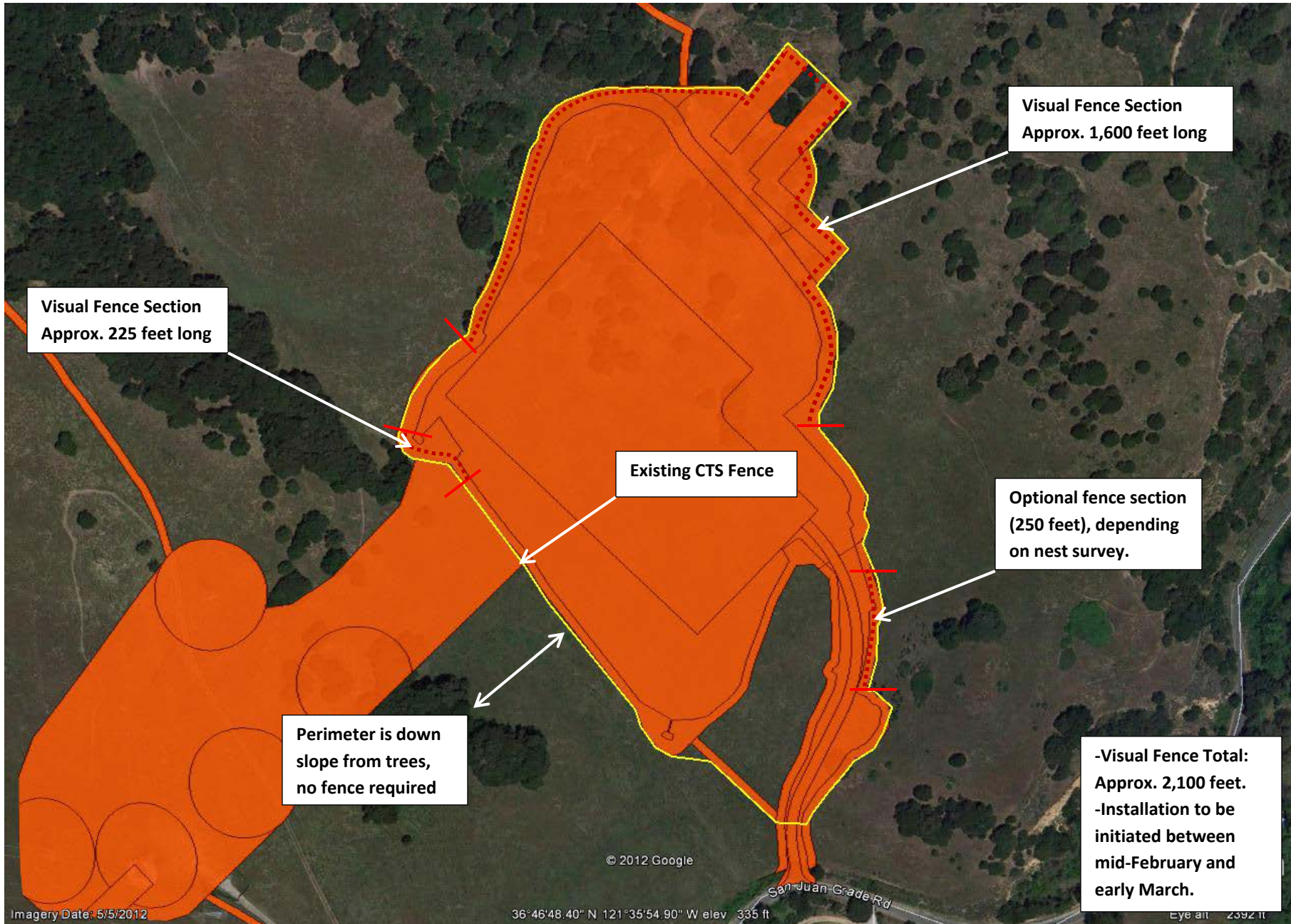
6. Other Preconstruction Activities

Worker Environmental Awareness Training

Worker Environmental Awareness Training was conducted on August 17, 2012. Additional field personnel who begin work for the bird-deterrent fence will be provided training on-site before beginning work. Consistent with the MMCRP, training logs will be provided to the CPUC on a monthly basis for recordkeeping.

Attachment 1 – NTP #4 Work Areas

Crazy Horse Switching Station Visual Barrier Fence



Attachment 2 – Mitigation Measures and Status

Table 1: Preconstruction Mitigation Measures			
APMs/Mitigation Measure	Implementation	Schedule	Status
<i>Aesthetics</i>			
<p>Mitigation Measure Aesthetics-6. PG&E shall implement the following measures to reduce construction-related visual effects as seen from the KOPs and within the immediate surroundings of the project area:</p> <ol style="list-style-type: none"> 1. Grading and construction limit lines shall be delineated on the ground for all access roads and power line routes. 2. [...]. 3. [...]. 	Verify installation of limit lines through on site observations.	Prior to clearing and grading activities	<p>Partially complete</p> <p><i>Limits were delineated as part of 2012 construction with the exception of the permanent access road (it is within the exclusion fence but permanent road boundaries not yet delineated)</i></p>
<p>Mitigation Measure Aesthetics-8. PG&E shall prepare and submit to Monterey County for review a full set of plans and specifications based on the Conceptual Landscape Plan presented on Figure 3.1-5, with the following additions and/or changes to the plan recommendations:</p> <ol style="list-style-type: none"> 1. The planting design shall emphasize visual screening of the switching station and related facilities as seen from San Juan Grade Road or Old Stage Road and take into consideration biological mitigation measures. 2. [...]. 	Verify content of Conceptual Landscape Plan through documentation.	Prior to construction	<p>Complete (with follow-up)</p> <p><i>Submitted to Monterey County for review 2/9/12. PG&E (Joyce Nichols) confirmed landowner okay with landscaping on his property. Need to produce copy of final plans and specifications.</i></p>
<i>Biological Resources</i>			
<p>APM Biology-13. PG&E will obtain coverage under the Construction Storm Water Permit Program and implement BMPs for erosion and sediment control.</p>	Verify issuance of Construction Storm Water Permit through documentation.	Prior to construction	<p>Complete</p> <p><i>WDID# 3 27C364487 issued August 30, 2012.</i></p>
<p>Mitigation Measure Biology-8 (proposed to supersede APM Biology-8). A USFWS-approved biologist shall design and lead a Worker Environmental Awareness Program (WEAP) for all construction and on-site personnel prior to beginning construction activities. Training shall include a discussion of avoidance and minimization measures to be implemented to protect biological resources, as well as the terms and conditions of the Biological Opinion and other permits. Training shall include information on the federal and state ESAs, the Migratory Bird Treaty Act (MBTA), and the Bald and Golden Eagle Protection Act, and the consequences of noncompliance with these acts. Workers shall be informed of the presence, life history, and habitat requirements of all special-status species, including the CRLF, with a potential to be affected within the project area. The training shall include a description of the CRLF and its habitat and the importance of the CRLF and its habitat, along with the general measures that are being implemented to conserve the CRLF, as they relate to the project. Training shall include information on state and federal laws protecting nesting birds, wetlands, and other water resources. An educational brochure shall be produced for construction crews working on the project. The brochure shall include color photos of sensitive species as well as a discussion of mitigation measures. Verify content of training materials and submittal of training attendance sheets through documentation. No construction worker shall be involved in field operations without having participated in this special-status species/sensitive habitat informational training. A copy of the WEAP shall be submitted to the CPUC at least 30 days prior to construction. Training attendance sheet(s) shall be submitted to the CPUC after each training session.</p>	Verify content of training materials and submittal of training attendance sheets through documentation.	30 days prior to construction	<p>Complete</p> <p><i>Submitted to CPUC July 23, 2012.</i></p>
<p>APM Biology-15. PG&E has and will implement its system-wide program which includes established procedures for handling and managing hazardous substances and emergency response in the event of a hazardous substance spill. These procedures will add to the requirements in the project SWPPP.</p>	Verify incorporation of program into SWPPP through documentation.	Prior to construction	<p>Complete</p> <p><i>CPUC acknowledged program is not a stand-alone document on August 27, 2012.</i></p>

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
<p>Mitigation Measure Biology-21 (proposed to supersede APM Biology-21). Pre-construction surveys for CRLF and CTS shall be conducted by a USFWS/CDFG-approved biologist no more than five days prior to the initiation of any ground disturbing activities within 600 feet of suitable aquatic or upland habitat. Visual encounter surveys shall be conducted within areas subject to ground disturbing activities. All suitable aquatic and upland habitat including refugia habitat such as under shrubs, downed logs, small woody debris, burrows, etc., shall be thoroughly inspected. [...].</p>	<p>Verify completion of surveys through documentation.</p>	<p>No more than 5 days prior to construction</p>	<p>Outstanding <i>Surveys were conducted in March and August 2012. Need to be performed again no more than 5 days prior to construction, and immediately prior to ground-disturbing activities</i></p>
<p>Mitigation Measure Biology-23 (proposed to supersede APM Biology-23). Prior to the commencement of construction activities, flagging, signage, and/or high visibility fencing shall be erected around the CRLF, CTS, and coast range newt aquatic habitat to identify and protect it from the encroachment of personnel and equipment. [...].</p>	<p>Verify presence of flagging, signage, and/or fencing around CTS and CRLF aquatic habitat through on-site observations.</p>	<p>Prior to construction</p>	<p>Not applicable <i>No aquatic habitat within work areas.</i></p>
<p>Mitigation Measure Biology-26 (proposed to supersede APM Biology-26). Prior to the start of construction, PG&E shall obtain an Incidental Take Permit from CDFG for CTS.</p>	<p>Verify results of consultations through documentation.</p>	<p>Prior to construction</p>	<p>Complete (with follow-up) <i>Permit issued September 7, 2011; amendment to expiration date sought and to be submitted to CPUC.</i></p>
<p>Mitigation Measure Biology-27 (proposed to supersede APM Biology-27). Pre-construction bird nesting surveys in the project area shall be conducted no more than 30 days before work is performed between February 1 and August 15. [...].</p>	<p>Verify completion of surveys through documentation.</p>	<p>Prior to construction between February 1 and August 15</p>	<p>Outstanding <i>Surveys were conducted in March, April and June 2012. Need to be performed again no more than 30 days prior to construction.</i></p>
<p>Mitigation Measure Biology-28 (proposed to supersede APMs Biology-25 and Biology-28). No more than 30 days prior to the start of construction, preconstruction surveys for burrowing owls will be conducted in accordance with agency survey protocols to identify any burrowing owl or secondary sign of burrowing owls should any burrowing owls move onto the project area prior to construction. If ground-disturbing activities in suitable habitat are delayed or suspended for more than 30 days after the pre-construction surveys, the site will be resurveyed. If no burrowing owls are detected, no further mitigation is necessary. [...].</p>	<p>Verify completion of surveys through documentation.</p>	<p>No more than 30 days prior to construction</p>	<p>Outstanding <i>Surveys were conducted in March August 2012. Need to be performed again no more than 30 days prior to construction.</i></p>
<p>Mitigation Measure Biology-29 (proposed to supersede APM Biology-29).Pre-construction surveys, <i>i.e.</i> visual encounter surveys using binoculars, shall be conducted for all areas that provide suitable bat roosting habitat, including man-made structures, snags, rotten stumps, mature trees with broken limbs, trees with exfoliating bark, bole cavities or hollows, dense foliage, etc. Sensitive habitat areas and roost sites shall be avoided to the maximum extent practicable. If no suitable roost sites are identified, no further minimization measures are necessary. [...].</p>	<p>Verify completion of surveys through documentation.</p>	<p>Prior to construction, prior to spring breeding season for bats</p>	<p>Complete <i>Surveys were performed prior to tree removal in September 2012.</i></p>
<p>Mitigation Measure Biology-31 (proposed to supersede APM Biology-31). A qualified biologist will survey the project area for badger dens prior to construction. If a badger den is found, the biologist will monitor the den to determine if it is actively being used by a badger. The biologist will determine this based on visual observation of the burrow or using camera traps to document its presence. Since badgers frequently changes dens, the biologist will monitor active dens to determine when the badger(s) is no longer using the den. [...]. If no badger dens are found or if potential dens are determined not to be active, no further mitigation is necessary.</p>	<p>Verify completion of surveys through documentation.</p>	<p>Prior to construction</p>	<p>Outstanding <i>Surveys were conducted in March and August 2012. Need to be performed again prior to construction.</i></p>

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
<p>Mitigation Measure Biology-34. Preconstruction surveys shall be conducted by a qualified biologist immediately prior to the initiation of any ground disturbing activities within or immediately adjacent to suitable southwestern pond turtle, black legless lizard, and coast range newt habitat. Visual encounter surveys shall be conducted within or immediately adjacent to areas subject to ground disturbing activities. All suitable aquatic and upland habitat for turtles and/or coast range newts, and friable soils within northern mixed chaparral/central maritime chaparral and oak woodland habitat for black legless lizards shall be thoroughly inspected. [...]. If no southwestern pond turtles and black legless lizards are observed during the preconstruction surveys, construction shall commence as scheduled.</p>	<p>Verify completion of surveys through documentation.</p>	<p>Prior to construction</p>	<p>Outstanding <i>Surveys were conducted in March and August 2012. Need to be performed again immediately prior to ground-disturbing activities.</i></p>
<p>Mitigation Measure Biology-36. No more than 30 days prior to the start of construction, for construction activities scheduled to begin during the breeding season from February 1 to August 31, a USFWS-approved biologist will conduct nest and point count surveys within one mile of the project footprint for golden eagles and white-tailed kites, unless otherwise directed by CDFG and/or USFWS. If surveys take place prior to February 15, then surveys will be repeated to detect any nesting activity. [...].</p>	<p>Verify completion of pre-construction nest survey through documentation.</p>	<p>No more than 30 days prior to construction</p>	<p>Outstanding <i>Surveys were conducted in 2012 as part of the Hollister Project (overlapping project work area). Need to be performed no more than 30 days prior to construction in 2013.</i></p>
<p>Mitigation Measure Biology-37. Monitoring guidelines will 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 will be submitted to the CPUC for recordkeeping.</p>	<p>Verify preparation of Avian Protection Plan through documentation.</p>	<p>Prior to construction</p>	<p>Outstanding <i>PG&E is addressing comments from agencies as appropriate. Finalized APP to be submitted to CPUC for recordkeeping.</i></p>
<p>Mitigation Measure Biology-40. [...]. Prior to construction, oak trees greater than 6 inches in diameter at two feet above ground level that need to be removed within the work areas shall be enumerated to determine the total number of individuals affected. A description of the species, diameter at two feet above ground level, estimated height, and general health of the trees to be removed shall be recorded. Oak trees will be replaced or transplanted at a one-to-one ratio as shown in the Conceptual Landscaping Plan (Figure 3.1-4) or as determined in consultation with Monterey County. As detailed in mitigation measure Aesthetics-10, PG&E shall submit to Monterey County, and work closely with the County on, a full set of plans and specifications based on the Conceptual Landscape Plan presented on Figure 3.1-4 prior to construction.</p>	<p>Verify content of detailed landscaping plans through documentation.</p>	<p>Prior to construction</p>	<p>Complete/Follow-up <i>Arborist survey conducted in December 2011 and May 2012. Results of survey submitted to Monterey County on 2/9/12 and preliminary landscaping plans and specifications submitted to County as part of grading permit application. Final landscaping plans and specifications to be submitted to County and CPUC.</i></p>

Table 1: Preconstruction Mitigation Measures			
APMs/Mitigation Measure	Implementation	Schedule	Status
<i>Cultural Resources</i>			
<p>Mitigation Measure Cultural-1. PG&E shall design and implement a Worker Environmental Awareness Program that shall be provided to all project personnel who may encounter and/or alter unique archaeological properties, historical resources, or paleontological resources, including construction supervisors and field personnel. No construction worker shall be involved in field operations without having participated in the Worker Environmental Awareness Program. The Worker Environmental Awareness Program shall include, at a minimum:</p> <ol style="list-style-type: none"> 1. A review of archaeology, history, prehistory, and Native American cultures associated with historical resources in the project vicinity. 2. A review of photographs and figures of potential historical resources, unique archaeological properties, and paleontological resources in the project area. 3. A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historical preservation. 4. A discussion of procedures to be followed in the event that unanticipated paleontological or cultural resources are discovered during implementation of the project. 5. A discussion of disciplinary and other actions that could be taken against persons violating historical preservation laws and PG&E policies. 6. A statement by the construction company or applicable employer agreeing to abide by the Worker Environmental Awareness Program, PG&E policies, and other applicable laws and regulations. <p>The Worker Environmental Awareness Program may be conducted in concert with other environmental or safety awareness and education programs for the project. Worker Environmental Awareness Program training materials and/or presentations shall be submitted to the CPUC for review and recordkeeping requirements prior to the start of training sessions and prior to the start of construction.</p>	Verify content of training materials and submittal of training attendance sheets through documentation.	At least 30 days prior to construction	<p>Complete <i>WEAP submitted to CPUC on July 23, 2012.</i></p>
<i>Geology and Soils</i>			
<p>Mitigation Measure Geology-6. PG&E shall prepare an ECSTP as an element of the SWPPP describing BMPs to be used during construction. [...]The plan shall address construction in or near sensitive areas described in Section 3.5, Biological Resources. BMPs, where applicable, shall be designed based on specific criteria from recognized BMP design guidance manuals. [...]. The ECSTP shall be submitted to the CPUC for review at least 30 days prior to the start of construction. [...].</p>	Verify content of ECSTP through documentation.	30 days prior to construction	<p>Complete <i>ECSTP is part of SWPPP; submitted to CPUC on August 29, 2012.</i></p>
<i>Hazards and Hazardous Materials</i>			
<p>APM Hazards-1. PG&E will submit a Hazardous Substance Control and Emergency Response Plan to the CPUC for recordkeeping at least 30 days prior to project construction. The plan will identify methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction through operation. The plan will require implementing appropriate control methods and approved containment and spill-control practices (i.e., spill control plan) for construction and materials stored on-site. [...].</p>	Verify content of Hazardous Substance Control and Emergency Response Plan through documentation.	30 days prior to construction	<p>Complete <i>Hazardous Substance Control and Emergency Response Plan submitted to CPUC on July 23, 2012.</i></p>
<p>APM Hazards-2. PG&E will prepare a site-specific Health and Safety Plan to ensure that potential safety hazards would be kept at a minimum. The plan will include elements that establish worker training and emergency response procedures relevant to project activities. The plan will be submitted to the CPUC at least 30 days prior to construction for CPUC recordkeeping.</p>	Verify content of Health and Safety Plan through documentation.	30 days prior to construction	<p>Complete <i>Health and Safety Plan submitted to CPUC on July 23, 2012.</i></p>

Table 1: Preconstruction Mitigation Measures			
APMs/Mitigation Measure	Implementation	Schedule	Status
APM Hazards-3. PG&E will prepare and submit a Fire Prevention and Response Plan to the CPUC and to local fire protection authorities for notification at least 30 days prior to construction. The plan will include fire protection and prevention methods for all components of the project during construction. The plan will include procedures to reduce the potential for igniting combustible materials by preventing electrical hazards, use of flammable materials, and smoking onsite during construction and maintenance procedures. Project personnel will be directed to park away from dry vegetation; to equip vehicles with fire extinguishing equipment; not to smoke; and to carry water, shovels, and fire extinguishers in times of high fire hazard.	Verify content of Fire Prevention and Response Plan through documentation.	30 days prior to construction	Complete <i>Fire Prevention and Response Plan submitted to CPUC on July 23, 2012.</i>
APM Hazards-4. 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 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 Hazardous Substances Control and Emergency Response Plan, SWPPP, Erosion Control and Sediment Transport Plan, and Health and Safety Plan.	Verify content of training materials and submittal of training attendance sheets through documentation and on-site observations.	Prior to construction	On-going <i>WEAP submitted to CPUC on July 23, 2012. Attendance sheets submitted to CPUC on a monthly basis.</i>
APM Hazards-5. A monitoring program will be implemented to ensure that the plans are followed throughout the construction period. [...]	Verify content of plans through documentation.	Prior to construction	On-going <i>Electronic compliance reporting system currently in use.</i>

Table 1: Preconstruction Mitigation Measures			
APMs/Mitigation Measure	Implementation	Schedule	Status
Hydrology and Water Quality			
<p>APM Hydrology-1. Worker environmental awareness will communicate environmental issues and appropriate work practices specific to this project. This awareness will include spill prevention and response measures and proper BMP implementation. The SWPPP training will emphasize site-specific physical conditions to improve hazard prevention (e.g., identification of flow paths to nearest waterbodies) and will include a review of all site-specific water quality requirements, including applicable portions of the Health and Safety Plan and PG&E's Hazardous Substances Control and Emergency Response program.</p>	<p>Verify content of training materials and submittal of training attendance sheets through documentation.</p>	<p>Prior to construction</p>	<p>On-going <i>WEAP submitted to CPUC on July 23, 2012. Attendance sheets submitted to CPUC on a monthly basis.</i></p>
<p>APM Hydrology-2. PG&E will file a Notice of Intent with the State Water Resources Control Board for coverage under the General Construction Storm Water Permit and will prepare and implement a SWPPP in accordance with General Order No. 99-08-DWQ. Implementation of the SWPPP will help stabilize graded areas and waterways and reduce erosion and sedimentation. The following measures are generally drawn from that permit and PG&E's standard practices, and will be included in the SWPPP prepared for the construction of the project:</p> <ol style="list-style-type: none"> 1. All BMPs will be on-site and ready for installation before the start of construction activities. 2. BMPs will be developed to prevent the acceleration of natural erosion and sedimentation rates. A monitoring program will be established to ensure that the prescribed APMs are followed throughout project construction. BMPs will include: <ol style="list-style-type: none"> a. straw wattles, water bars, covers, silt fences, sensitive area access restrictions (e.g., flagging), or other sediment containment methods placed around and/or down slope of work areas prior to earth disturbing activities and before the onset of winter rains or any anticipated storm events; b. mulching, seeding, or other suitable measures to protect exposed areas during construction activities as necessary; c. installation of additional silt fencing prior to construction along the southern and western edges of the proposed switching station site to address unforeseen runoff from the property into the nearby intermittent drainages, seasonal wetlands, and Gabilan Creek; d. use of brooms and shovels (as opposed to water) when possible to maintain a clean site; e. construction of a stabilized construction entrance/exit to prevent tracking of dirt onto San Juan Grade Road; f. establishment of a vehicle storage, maintenance, and refueling area, if needed, to minimize the spread of oil, gas, and engine fluids. Use of oil pans under stationary vehicles is strongly recommended; and g. no overnight parking of mobile equipment within 100 feet of wetlands, culverts, or creeks. Stationary equipment (e.g., pumps, generators) used or stored within 100 feet of wetlands, culverts, or creeks will be positioned within secondary containment. 3. All BMPs will be inspected before and after each storm event. BMPs will be maintained on a regular basis, and replaced as necessary throughout the course of construction. 4. A Qualified SWPPP Practitioner will supervise placement of silt fencing at the proposed switching station site to limit the area of disturbance during construction at the site. The silt fence will be monitored regularly to ensure effectiveness. <p>PG&E will provide compensatory mitigation for permanent impacts to waters of the state and waters of the U.S. as required by the USACE, RWQCB, and CDFG as part of the permitting process for each agency.</p>	<p>Verify submittal of Notice of Intent through documentation.</p> <p>Verify incorporation of measures into SWPPP through documentation.</p>	<p>Prior to construction</p>	<p>NOI- Complete <i>WDID# 3 27C364487 issued August 30, 2012.</i></p> <p>BMP's onsite – On-going <i>BMP's on site for 2012 construction (NPT #3); BMP's for 2013-2014 construction will be implemented during 2013-2014 construction.</i></p> <p>Compensatory Mitigation – Outstanding <i>PG&E to coordinate implementation of wetland mitigation plan</i></p>