Crazy Horse Canyon Switching Station Project

Mitigation Monitoring, Compliance, and Reporting Program

Monterey County, California

March 2012, Revised April 2013

Prepared for:

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Prepared by:

Panorama Environmental, Inc.
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San Francisco, California 94111
650.373.1200

PANORAMA ENVIRONMENTAL, INC.

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1 INTRODUCTION

1.1 SUMMARY OF ENVIRONMENTAL PROCESS

1.1.1 CEQA REVIEW AND REQUIREMENTS

Pacific Gas and Electric Company (PG&E) proposes to construct and operate the Crazy Horse Canyon Switching Station Project. The project is located north of the City of Salinas in Monterey County, northeast of the intersection of Crazy Horse Canyon Road and San Juan Grade Road.

The Crazy Horse Canyon Switching Station will replace the Lagunitas Switch, an existing power line tower located approximately 850 feet west of the proposed switching station site. The Lagunitas Switch will be removed once the Crazy Horse Canyon Switching Station is operational, and the 115 kV lines that enter and leave the new switching station will be sectionalized and renamed. No new power lines will be constructed as part of the project.

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared by the California Public Utilities Commission (CPUC), pursuant to the California Environmental Quality Act (CEQA) to address the potential impacts of the project on the environment. The Final IS/MND was adopted on June 17, 2011. Several mitigation measures were identified to reduce all of the impacts of the proposed project to less-than-significant levels. The Final IS/MND also includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP). Chapter 4 of the Final IS/MND provides the recommended framework for the implementation of the MMCRP by the CPUC and describes the roles and responsibilities of government agencies in implementing and enforcing adopted mitigation measures.

1.1.2 MMCRP REQUIREMENTS

This MMCRP has been prepared in accordance with the requirements set forth in the Final IS/MND and includes the information provided in Chapter 4, as well as specific protocols to be followed by PG&E Environmental Inspector(s) (EI), CPUC Environmental Monitor(s) (EM), and PG&E project staff prior to and during construction. TRC Solutions, Inc. (TRC) will be providing the PG&E EI and environmental monitors as needed for biological resources. ETIC Engineering Inc. (ETIC) will be providing PG&E's environmental monitors as needed for stormwater resources. Panorama Environmental, Inc. (Panorama) will be providing the CPUC EM.

Implementation of the MMCRP requires direct participation and commitment from the PG&E and CPUC compliance teams. The success of the program depends upon coordination and communication between the project management staff, monitors, and construction personnel. This MMCRP was developed to provide guidelines for mitigation implementation and to standardize procedures for environmental compliance during project construction. The procedures have been developed in coordination with PG&E, the CPUC, and Panorama to

define reporting relationships, roles and responsibilities of the project's environmental compliance team members, compliance reporting procedures, and communication protocols.

1.2 AUTHORITY AND PURPOSE OF THE PROGRAM

Pursuant to Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines, the CPUC must adopt an MMCRP to clarify requirements for mitigation monitoring or reporting. The CPUC views this MMCRP as a working and living guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

1.3 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 June 17, 2011, (Approval No: D1106011).

1.4 SCHEDULE

Construction commenced September 4, 2012, with an estimated completion date of April 25, 2015. Construction would occur only during daylight hours to the extent feasible. If nighttime work is needed because of clearance restrictions on the power line, PG&E will take appropriate measures to minimize disturbance to local residents, including contacting nearby residences to inform them of the work schedule and probable inconveniences. Construction activities within 600 feet of suitable aquatic habitat [for special-status amphibians and reptiles] shall not begin prior to 30 minutes after sunrise and will cease no later than 30 minutes before sunset. Construction activities within 600 feet of suitable habitat for the California red-legged frog (CRLF) and California tiger salamander (CTS) aquatic habitat would be avoided during the wet season (October 15 to May 1) or as approved by the California Department of Fish and Game (CDFG) and U.S. Fish and Wildlife Service (USFWS). Construction activities may also be restricted during the period from February 1 through August 31 to avoid nesting birds. The proposed PG&E construction schedule is presented below in Table 1.4-1.

Table 1.4-1: Summary of Construction Workforce and Construction Schedule

Phase	Workforce	Duration
Grading activities for the switching station pad and access road construction	12 workers	4 months
Power line reconfiguration	8 workers	Intermittently for 1 year following grading
Switching station foundation construction	10 workers	5 months following grading
Construction of aboveground facilities at the switching station	8 workers	Approximately 4 months once foundation work is completed
Testing and commissioning of the switching station	5 workers	10 weeks

1.5 PROJECT DOCUMENTATION

1.5.1 CEQA DOCUMENT AND PROJECT PLANS

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

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

1.5.2 PERMITS

Local, state, and federal agencies have jurisdiction over lands and/or resources in the project area. The CPUC, as the lead agency, is responsible for ensuring that mitigation measures reviewed and approved by jurisdictional agencies during the Draft IS/MND process are implemented throughout construction. However, staff from other agencies may periodically visit the project site and request information regarding the status of mitigation implementation. PG&E is also required to submit survey results to the US Fish and Wildlife Service (USFWS), and to consult with the agency when project changes affect conditions identified in the project's permit. PG&E is responsible for satisfying requests from jurisdictional agencies, and will notify and copy the CPUC on all correspondences related to final approvals and permits for the project if the CPUC is not otherwise copied on the correspondence. Additional information on communication protocols is presented in Section 2.3 of this MMCRP. Table 1.5-1 lists jurisdictional agencies, purpose of consultation, and required permits associated with the project.

Table 1.5-1: Permits and Approvals That May Be Required

Permit/Approval	Agency	Jurisdiction/Purpose
Federal Agencies		
Section 7 Consultation (Biological Opinion)	U.S. Fish and Wildlife Service (USFWS)	Federally listed threatened and endangered species
Clean Water Act (CWA) Section 404 Nationwide Permit	U.S. Army Corps of Engineers (USACE)	Waters of the United States and their tributaries
State Agencies		
Permit to Construct (PTC)	California Public Utilities Commission (CPUC)	Overall project approval and California Environmental Quality Act (CEQA) compliance
National Pollutant Discharge Elimination System (NPDES) — General Construction Storm Water Permit and Stormwater Pollution Prevention Plan (SWPPP)	State Water Resources Control Board (SWRCB)	Permit required for all construction projects that disturb more than 1 acre
Section 401 Water Quality Certification (or waiver thereof)	California Regional Water Quality Control Board, Central Coast Region (RWQCB)	Certification that the project is consistent with state water quality standards
Section 2080.1 Consistency Determination	California Department of Fish and Game (CDFG)	Impacts to state-listed species (if required)
Section 2081(b) Incidental Take Permit for State-listed Species	CDFG	Impacts to state-listed species (if required)
Section 1600 Consultation	CDFG	Impacts to waters of the State (if required)
Local Agencies		
Roadway Encroachment Permit	Monterey County	Ministerial permit to install station access road from public road right-of-way
Welding, Grading, and Building Permits	Monterey County	Ministerial permission to conduct welding, grading, and certain building activities

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 MANGER

PG&E's Project Manager (PG&E PM), Alan Prior, provides the overall direction, management, leadership, and corporate coordination for the construction project. The PG&E PM will be based in PG&E's 10900 N. Blaney Avenue, Cupertino office location for the duration of construction. The PG&E PM's responsibilities for implementation of the environmental program include, but are not limited to:

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

2.1.2 PG&E CONSTRUCTION MANGERS

The Construction Managers, Marin Garcia (Substation Grading and Foundation), Dean Stidham (Transmission Line Segment), and Dale Brock (Steel Towers), will provide support to the PG&E PM and oversee activities of construction staff. The Construction Managers will be based out of PG&E's offices in Madera (Marin Garcia), Moss Landing (Dean Stidham), and Davis (Dale Brock), but may also be available in the field on an occasional basis. Specific responsibilities of the Construction Managers include, but are not limited to:

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

2.1.3 PG&E ENVIRONMENTAL MANAGER

PG&E's Environmental Manager, Cristina Holstine, is responsible for providing the appropriate level of resources for successful implementation of the MMCRP. The Environmental Manager is

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

2.1.4 PG&E ENVIRONMENTAL MONITORING TEAM

The PG&E monitoring team will include an Environmental Compliance Supervisor who will support the PG&E Environmental Manager and coordinate the activities of the PG&E EIs, as well as the biological, paleontological, and cultural field monitors (collectively, PG&E Specialty Monitors), as needed, to comply with each mitigation measure. PG&E EIs will work closely with construction personnel to ensure pre-construction surveys are completed and mitigation measures are correctly implemented. PG&E EIs are the primary field staff responsible for evaluating, documenting, and verifying that construction activities comply with all applicable mitigation requirements and federal, state and local permit requirements. PG&E EIs will also work closely with the CPUC EMs to determine the effectiveness of mitigation measures and whether adjustments are needed to provide adequate protection of sensitive resources. PG&E Specialty Monitors will be assigned as needed and required to protect sensitive biological, cultural, and paleontological resources. In some instances, a PG&E EI may perform specialty monitoring if he or she has the appropriate qualifications and experience.

2.1.5 CPUC PROJECT MANAGER

The CPUC Project Manager (CPUC PM), Andrew Barnsdale, 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 field inspection notes, as well as bi-weekly status and compliance reports. The CPUC PM will be notified of any problems with compliance and may suggest measures to help resolve any issues that arise. All variance requests will be submitted to the CPUC PM for review and approval.

2.1.6 CPUC ENVIRONMENTAL MONITORING TEAM

The CPUC will delegate compliance monitoring and reporting responsibilities to Panorama. The number of CPUC EMs and frequency of site inspections will depend on the number of concurrent construction activities and their locations. The CPUC EM, Rita Wilke, will report directly to the CPUC Monitoring Manager, Aaron Lui, who will oversee the day-to-day monitoring activities of the EMs, as well as determine the appropriate level of inspection frequency. The CPUC Monitoring Manager may also perform the duties of the CPUC EM, if necessary. The overall monitoring program will be administered under the direction and oversight of the CPUC Monitoring Director, Susanne Heim, and the CPUC PM. The CPUC monitoring team will stay apprised of construction activities, schedule changes, and construction progress. The CPUC EMs and Monitoring Manager will document compliance through bi-weekly reports and use of a mitigation measure tracking table.

Figure 2.1-1: Project Management Organizational Chart

PG&E Environmental Manager	Cristina Holstine
PG&E Environmental Compliance Supervisor	Janet Liver
PG&E Project Manager	Alan Prior
PG&E Environmental Inspectors	Vicki Trabold (Back-up as needed: Michael Mulroy, Benjamin Billick, Robert Whitthaus, Mark Bibbo, Jeff Steinman, Alan Roseto, Tiffany Ngo, Sara Higgins)
PG&E Specialty Monitors	Vicki Trabold, Mark Bibbo, Kevin Wiseman, Michael Mulroy, Ron Jackman, Heather Johnson, Gretchen Padgett-Flohr, Mark Allaback, David Laabs
PG&E Project Construction Managers	Marin Garcia (Substation Grading and Foundation) Dean Stidham (Transmission Line Segment) Dale Brock (Steel Towers)

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

- Verifying that all construction workers attend the project's environmental training program prior to beginning work on the ROW
- Reviewing and understanding the environmental requirements
- Implementing environmental protection requirements and conditions during construction
- Maintaining compliance with project requirements

- Responding to PG&E EI's requests during construction

2.1.8 MITIGATION MONITORING PROGRAM CONTACT LIST

A project contact list is included in Appendix B. The contact list includes the PG&E and CPUC monitors, project managers, supervisory staff, and other members of the project team and how they can be reached during construction. The contact list will be updated periodically and redistributed to the project team.

2.2 RESPONSIBILITIES

2.2.1 MONITORING

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

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

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

2.2.2 ENFORCEMENT

The CPUC is responsible for enforcing monitoring procedures through the CPUC EMs. The CPUC EMs note problems with monitoring, notify designated project members, and report the problems to the CPUC Monitoring Manager and Director, who then report problems to the CPUC PM. The CPUC has the authority to inform the Construction Managers or designated lead to stop or redirect any construction activity associated with the Crazy Horse Canyon Switching Station Project, when it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk beyond that already permitted[1].

[1] It should be noted that the CPUC has the authority to require that the applicant stop work or redirect any construction activity for any reason, not just the mitigation measure enforcement scenario outlined in in Section 2.2.2.

Table 2.2-1: Required On-Site Monitoring			
Mitigation Measure/ Applicant Proposed Measure Number	**Resource**	**Monitor**	**Project Area**
APM Air Quality-1	Air Quality: Dust Control Measure	General	All, as needed
APM GHG-1/2/3	Greenhouse Gas Emissions	General	All, as needed
APM Hydrology-2, APM Biology-14, Mitigation Measure Geology-6, and APM Hazards-5	Stormwater, erosion, and pollution	SWPPP	All, as needed
APM Biology-9	Sensitive Biological Areas	Biological	In or near sensitive habitats
APM Biology-17	Special Status Plants	Biological	Revegetation monitoring for special status plant recovery
Mitigation Measure Biology-22/33, and APM Biology-24	Sensitive Amphibian Species	Biological	Within 600 feet of CRLF and CTS aquatic habitat
Mitigation Measure Biology-27/36	Active Avian Nests	Biological	Within nest non-disturbance buffers
Mitigation Measure Biology-28	Active Burrowing Owl Nests	Biological	Within 160 feet of occupied burrows during September 1 through January 31, or within 250 feet during February 1 through August 31
Mitigation Measure Biology-29	Roosting Bat Nest	Biological	At potential or confirmed roosting bat nest or a maternity colony
Mitigation Measure Biology-31	Active Badger Dens	Biological	Within 250 foot of active den
Mitigation Measure Biology-32	Invasive Exotic Plants	Biological	Immediately offsite, in designated cleaning and inspections areas
Mitigation Measure Biology-34/35	Sensitive Reptile Species	Biological	Within 250 feet of an observed southwestern pond turtle, coast range newt, or black legless lizard
Mitigation Measure Cultural-2	Previously Unidentified Cultural Resources	Cultural/ Paleontological	Within 165 feet of a previously unidentified cultural or paleontological resource

The Construction Manager or designated lead will direct the crew to stop the construction activity in a safe and secure manner. The CPUC has assigned this authority to the CPUC monitoring team. The CPUC monitoring team will follow communication protocols that are defined in Section 2.3.3.

2.2.3 MITIGATION COMPLIANCE

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

PG&E shall inform the CPUC and its monitors, in writing, of any mitigation measures that are not or cannot be successfully implemented. The CPUC, in coordination with its monitors, will assess whether alternative mitigation is appropriate, and determine with PG&E the subsequent actions required. If the measures are agency permit requirements, then PG&E will consult with the permitting agency to determine the appropriate action.

Correspondence from agencies regarding mitigation measures or permit conditions will be provided to the CPUC and CPUC monitoring team.

2.3 COMMUNICATION

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible shut-downs, environmental and construction representatives must interact regularly and maintain professional, responsive communications at all times. Similarly, PG&E representatives must coordinate closely with CPUC EMs to address and resolve issues in a timely manner. Appendix C includes a communication protocol summary for use as quick reference, and to supplement information provided in Section 2.4.

2.3.1 PRE-CONSTRUCTION KICK OFF MEETING

A pre-construction meeting was held on March 14, 2012 with the CPUC and PG&E teams to review the MMCRP and to mutually agree upon the project's communication protocol. Based on discussion at the meeting and input from each party, Section 2 of this document was finalized and incorporated into the MMCRP.

2.3.2 WORKER ENVIRONMENTAL TRAINING PROGRAM

PG&E will facilitate a worker environmental training program prior to construction that will be coordinated to occur before work begins. This program will target construction management staff, inspectors, supervisors, and key foremen. The program will address specific resource issues and compliance requirements. Workers will be required to attend the environmental training program prior to starting work on the project.

Any project personnel that cannot attend the initial training session may coordinate with PG&E EIs to receive the required site training. Due to varying types of workers and duration of time they may spend on site, three levels of training may be provided, each with graduated levels of

access to the project site. Access to some site locations may be restricted to those who have had the appropriate level of training.

Levels of Training

The pre-construction worker environmental training will be considered the full environmental training. Watching a recorded video or the initial training would also certify workers at the full training level. Personnel that receive the full training will be given a site sticker to be displayed at all times while on site.

Two limited training levels are acceptable for delivery drivers and site visitors. Delivery drivers who have limited site access and would only be on site for a short time may receive a shortened training which will focus on selected resources and hazards with which they may come into contact. Similarly, site visitors may receive a shortened training, but must remain in the presence of a CPUC EM or PG&E EI during their site visit. Delivery drivers and site visitors will also receive a site sticker, but the sticker will be marked or visibly different from the full training sticker. Personnel that received a limited training level would need to complete the full training before receiving an unrestricted site sticker and associated project access.

Training logs that list all personnel and the training level they received must be maintained by PG&E's Environmental Manager and made available to the CPUC upon request.

2.3.3 PROGRESS MEETING

PG&E or its monitoring team may request the CPUC EM's participation in regular field meetings to help resolve any issues that may have arisen during the previous period and anticipate any issues that may arise during the upcoming activities. Alternatively, the CPUC monitoring team 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, both monitoring teams along with the CPUC PM may participate in regular teleconference calls to discuss project details.

2.3.4 DAILY AND WEEKLY COMMUNICATION

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

CPUC EM

The CPUC EM's primary point of contact in the field is the PG&E EI(s). The CPUC EM will contact a PG&E EI if an activity is observed that conflicts with one or more of the mitigation measures in order to correct the situation. If the CPUC EM cannot immediately reach a PG&E EI, then the PG&E Environmental Manager or Compliance Supervisor will be contacted to address the problem. The CPUC EM will contact a PG&E EI for construction locations, the

status of mitigation measure implementation, and schedule forecasts. The CPUC EM may discuss construction procedures directly with the construction contractors; however, PG&E may require that their contractors defer questions to an on-site PG&E representative. In all cases, the CPUC EM will contact PG&E's designated 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 inform the PG&E Construction Manager or designated lead 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). If an activity could have an immediate threat to a sensitive resource and doesn't allow time to contact the PG&E Construction Manager or designated lead to avoid impacts, and assuming it is safe to do so, the EM will have authority to temporarily halt activities. The CPUC EM's authority to halt an activity only applies to the direct activity that would cause the potential threat and only for a period of time long enough to contact the PG&E Construction Manager or designated lead for further direction or to avoid the threatened resource.

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 and status report for distribution to key project members, including the CPUC and its compliance team.

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

2.3.5 COMMUNICATION OF COMPLIANCE ISSUES

Section 3.1.5 describes procedures to communicate compliance issues identified by the monitoring teams during site inspections.

2.3.6 COORDINATION WITH OTHER AGENCIES

As discussed in Section 1.5.2, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. PG&E is responsible for contacting resource agencies and notifying them of issues within those agencies' jurisdiction. However, if there is an unresolved issue regarding compliance with a mitigation measure or permit requirement under the jurisdiction of a resource agency, the CPUC monitoring team 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 Manager or Monitoring Director will coordinate with PG&E prior to making this call and provide PG&E with an opportunity to participate in the call.

2.3.7 DISPUTE RESOLUTION

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

Issues should be first addressed informally at the field level between the CPUC EMs and PG&E EIs, or at regular progress meetings. Questions may be raised to the PG&E Environmental Manager, Compliance Supervisor, and PM. 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 PM for resolution. The CPUC PM will attempt to resolve the dispute informally. Should this informal process fail, the CPUC PM will inform PG&E prior to initiating Step 2.

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

Step 3 If a dispute or complaint regarding implementation or evaluation of the Program or mitigation measures cannot be resolved informally or through a letter request, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants to resolve the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.

Step 4 If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

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

3 ENVIRONMENTAL COMPLIANCE AND FIELD PROCEDURES

3.1 MITIGATION MEASURES COMPLIANCE AND REPORTING

3.1.1 PRE-CONSTRUCTION COMPLIANCE VERIFICATION

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

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

Panorama, 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, Panorama 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, the CPUC may authorize construction to begin on a phased basis, and Panorama will complete pre-construction compliance review accordingly. The CPUC may issue NTPs for construction of each phase separately as pre-construction compliance is satisfactorily accomplished for that phase.

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

3.1.2 NOTICE TO PROCEED PROCEDURE

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

construction-related equipment and/or materials onto a site. In some instances, compliance with every requirement cannot be met prior to NTP issuance and the NTP may be conditioned to define actions that will be undertaken and documented prior to construction.

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

An NTP request must include the following information:

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

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

7. Panorama 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 3.3.1 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 EIs 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. Site inspection forms will be utilized to document compliance of specific crews, construction activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate PG&E's weekly and Panorama's bi-weekly compliance reports, as well as update the status of mitigation measures listed in Appendix G.

3.1.5 COMPLIANCE LEVELS

During project activities, observations of issues and concerns will be documented in PG&E's weekly compliance report and in Panorama's bi-weekly compliance report. Three compliance level terms will be used by the CPUC to describe observations of problems, potential problems, or unaddressed concerns with project requirements. Compliance level terms are listed below in order of severity with a description of potential examples and required actions by the reporting party (PG&E EI or CPUC EM):

1) **Occurrence.** Observations or events that do not rise to the level of a noncompliance event, but that if left uncorrected or repeated could result in an incident or noncompliance.
    - **Potential Examples:** minor loose trash, minor oil spill, a minor mistake that did not result in a reduction in a mitigation measure's effectiveness (i.e. incorrectly installed erosion controls that are repaired before erosion or a rain event has occurred). Safety measure mistakes maybe elevated in compliance level immediately.
    - **Required Actions:** EM or EI notifies alternate party of issue → A follow up time is determined, if needed →EIs address the issue and follow up with EM until the issue is resolved.
2) **Incident.** Issues involving an activity or observed resource protection measure that only slightly deviate from project requirements and does not put a resource at risk. Repeated

occurrences involving the same issue may be documented as an incident. Repeated incidences involving the same issue may result in noncompliance.

- **Potential Examples:** Failure to properly maintain an erosion or sediment control, use of an existing unapproved access road, project personnel begin work on the ROW without proof of training, or project personnel work outside the approved work limits within a previously disturbed area.
- **Required Actions:** EM or EI notifies alternate party of issue → Reporting party notifies project compliance team of incident in writing by the end of the following business day (project compliance team includes: CPUC PM, CPUC Monitoring Director, CPUC Monitoring Manager, CPUC EM, PG&E Environmental Manager, PG&E Compliance Supervisor, and PG&E EIs [Criteria for Notification of Incident in Appendix D or email equivalent with same information]) → PG&E EIs or Environmental Compliance Supervisor provides follow up actions taken → EM and EIs follow up with issue until resolved

3) **Noncompliance.** An observation or event that deviates from permit conditions or mitigation measures and puts a resource at un-permitted risk. A noncompliance level reporting term may also result from repeated incidents involving the same issue, or if a mitigation measure is not implemented according to specified requirements.

    - **Potential Examples**: Use of an unapproved and previously undisturbed or resource sensitive area, encroachment into an exclusion zone or sensitive resource area designated for avoidance, use of an unapproved staging area or extra workspace, brush clearing outside the approved work limits, work without biological pre-construction surveys or a biological monitor on site where and when required, or lack of implementation of a project requirement or mitigation measure.
    - **Required Actions:** CPUC PM, Monitoring Director, or Monitoring Manager notifies project compliance team in writing of the noncompliance issue (project compliance team includes: CPUC PM, CPUC Monitoring Director, CPUC Monitoring Manager, CPUC EM, PG&E Environmental Manager, PG&E Compliance Supervisor, and PG&E EIs) → PG&E's compliance team provides follow up action details → Project compliance teams follow up with issue until resolved (see below for further information)

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

Details of all three compliance level issues, including potential delayed impacts, and follow up actions will be included in PG&E's weekly and Panorama's bi-weekly compliance reports.

Copies of any incident or noncompliance level notifications will also be included in these reports.

PG&E may require workers and subcontractors to use different reporting terms to document their own compliance. If so, those terms must be equated and given a CPUC equivalent term (occurrence, incident, or noncompliance) in their weekly status and compliance report for overall project record keeping. If PG&E uses separate reporting terms that will be converted to CPUC terms, an agreed upon guide for conversion must be developed between the compliance teams before construction begins.

3.2 PROJECT CHANGES

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

3.2.1 VARIANCE PROCEDURE

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

A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, APMs, or correction of such deviation, will be reported immediately to the CPUC monitoring team for their review. The CPUC monitoring team 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 PM for review and approval. The CPUC PM may request a site visit or additional information from the CPUC EM in order to process the variance. In some cases, a variance may also require approval by jurisdictional agencies. A checklist of information required for a variance is included in Appendix E.

To request a project variance, the checklist located in Appendix E needs to be completed and sent to the CPUC PM and monitoring team for review.

3.2.2 TEMPORARY EXTRA WORK SPACE PROCEDURES

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

- The TEWS is located in a disturbed area with no sensitive resources, or on site or adjacent land uses that could be disrupted
- PG&E has permission of the applicable landowner (e.g., municipality or private) to use the work space

Use of the TEWS would not result in any significant environmental impacts. In the event that PG&E determines a need for a construction TEWS, a request must be submitted to the CPUC Monitoring Manager. The CPUC Monitoring Manager 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 Manager. A checklist of information required for a temporary extra workspace approval is included in Appendix E.

To request a TEWS, the checklist located in Appendix E needs to be completed and sent to the CPUC Monitoring Manager and EM for review.

Standard Conditions of Approval

- Use of TEWS is limited to 60 days.
- 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 appropriately 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 Manager, the CPUC EM, and the CPUC Monitoring Manager for review and to be addressed by PG&E

3.2.3 MINOR FIELD CHANGES

A minor field change is a change in the project construction methods that is minor in scope and that would not result in new or potentially significant to the environment, the determination of which is readily discernible by the CPUC EM in the field. The CPUC Monitoring Manger or EM may determine that impacts associated with a proposed change are minor in scope and would

not result in new or potentially significant impacts, and for this reason do not require a request or approval for variance from the project as it was approved in the IS/MND. If PG&E requests a minor field change, a list of required information will need to be provided to the CPUC Monitoring Manger and EM, which are included in Appendix E. Should the Monitoring Manager and EM determine such a change is minor and does not warrant a variance request, he or she will approval the activity and document the decision in an email sent to the project compliance team.

Examples of a potential informal minor change include:

- Use of a vehicle turnaround, pull out, or passing space in a previously disturbed area
- Minor extra road widths that do not require grading or clearing
- Use of a minor existing road segment in a previously approved work area
- Adding or shifting a minor workspace to avoid an environmental resource
- Shifting a pull and tension site boundary that would not result in new or additional impacts.

All areas must be have been surveyed and not have any biological and cultural resource issues.

The CPUC EM can provide a verbal approval to the EI in the field but will provide documentation of a minor change approval in an email to the project compliance team after the listed approval criteria has been received. Potential denial of a request may or may not be documented based on discussions in the field. If approval of a minor change is denied through this process, a variance or TEWS form may be submitted to request the change. Approvals will not be processed without receipt of the completed project change criteria checklist (Appendix E).

Note that all IS/MND project requirements, as well as permit conditions and mitigation measures apply to the minor field change action, unless otherwise approved and specified.

3.3 RECORDS MANAGEMENT

Any daily inspection and weekly status reports will be filed and used by Panorama to prepare a brief, final environmental compliance report following the completion of construction. The final report will provide a discussion on how each mitigation measure was implemented and will include copies of submittals required for compliance. In addition, the success criteria will be evaluated and used for future projects.

3.4 PUBLIC ACCESS TO RECORDS

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

4 MITIGATION MONITORING PROGRAM TABLE

4.1 USING THE TABLE

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

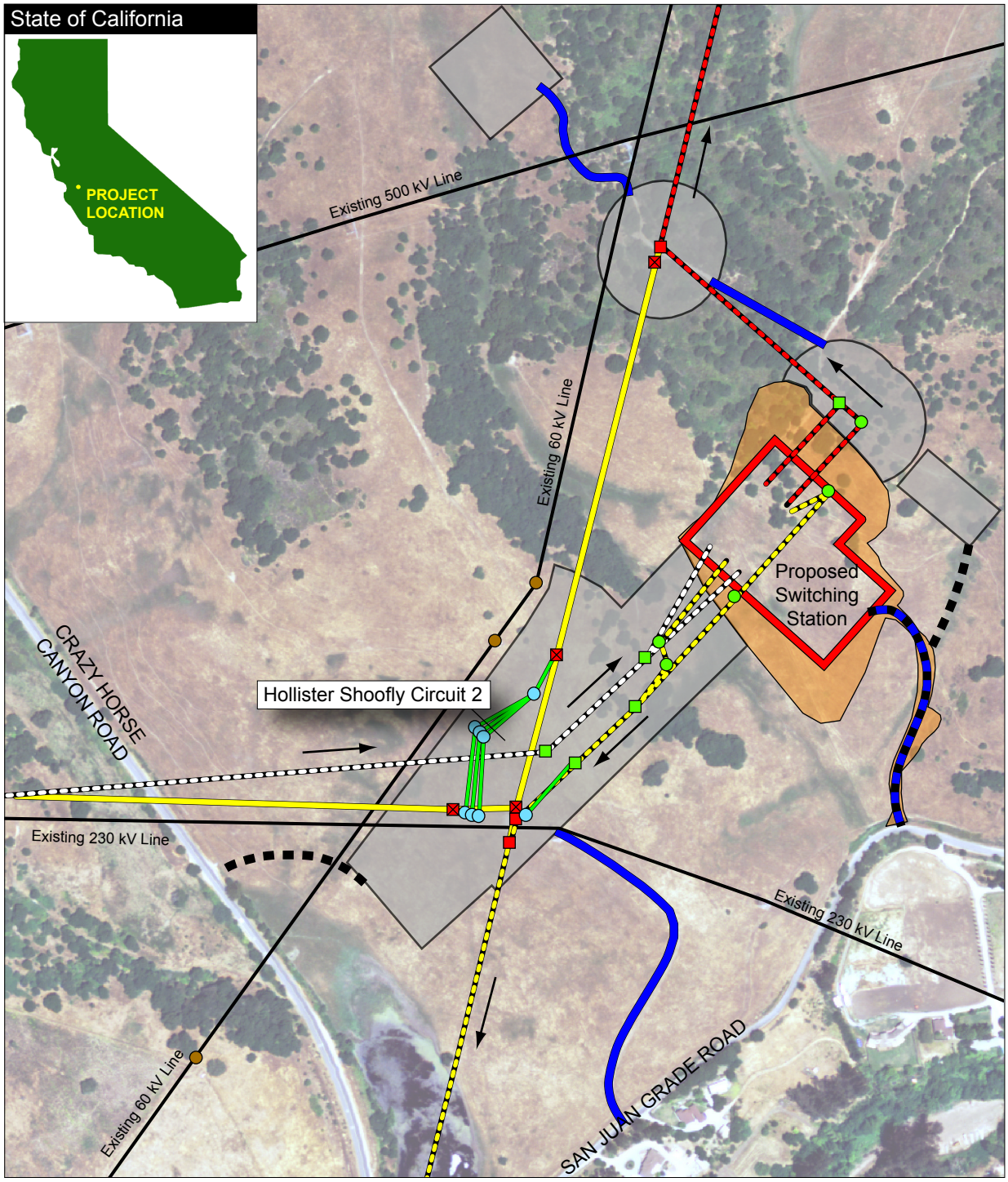
The CPUC will use a modified version of the mitigation measure tables during the pre-construction planning and construction monitoring phases of the project to accurately track the status of mitigation measures. Tables will be sorted and divided into pre-construction measures and measures to be implemented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

4.2 EFFECTIVENESS REVIEW

The CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts, at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 2.3.7. If the CPUC determines that any conditions are not adequately mitigating environmental impacts caused by the project, then the CPUC 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 CPUC's rules and practices.

APPENDIX A:
PROJECT SEGMENT MAPS

Figure A-1: Aerial Map of Proposed Switching Station



SOURCE: PG&E 2012, ESRI 2010, and RMT Inc. 2012

Scale: 1:6,000

*Please Refer to Legend Information on the Following Page

N W E S

0 125 250 500 750 1,000 Feet

RMT
ENVIRONMENT • ENERGY • ENGINEERING

APPENDIX B:
PROJECT CONTACT LIST

APPENDIX C:
COMMUNICATION PROTOCOL SUMMARY

COMMUNICATION PROTOCOL SUMMARY

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

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

Table C-1: Communication Protocol

Action Item	Responsibility	Primary Contact(s)	Secondary Contact(s)/ Participants	Description
Meetings				
Regular Construction Meetings	PG&E Construction Managers and EIs	CPUC EM	TBD	Regular construction meetings are held in the field to discuss construction progress, and construction and environmental issues. Refer to Section 2.4.2 of the MMCRP.
Bi-Weekly Teleconference Calls, as needed	CPUC Monitoring Director and Manager	CPUC PM	Project management and compliance teams	Bi-weekly teleconference calls may be held to discuss status of mitigation measures, construction schedule, issues noted during site visits, and project changes, as needed.
Field Meetings	PG&E EIs or CPUC EMs	TBD	TBD	Field meetings may be requested by any party to discuss variance requests, compliance problems, or other site-specific issues.
Project Changes				
Scheduling	PG&E compliance team	CPUC Monitoring Director and Monitoring Manager	CPUC EMs	Changes in project schedule that could affect the status of mitigation measures will be communicated to the CPUC monitoring team. If the project change will have an immediate impact, the CPUC EM or CPUC Monitoring Manager will be contacted by phone.
Variance Requests	PG&E PM. Environmental Manager, or Compliance	CPUC Monitoring Director and Manager	CPUC PM	All variance requests will be submitted to the CPUC monitoring team and CPUC PM through the project change criteria list and supporting documentation. The

	Supervisor			CPUC monitoring team will review the information in the variance request for completeness. The CPUC PM will distribute a variance request approval or denial after review is complete. Refer to Section 3.3.1 of the MMCRP.
TEWS and Minor Field Change Requests	PG&E Environmental Manager, Compliance Supervisor, or EIs	CPUC Monitoring Manager and EM	CPUC Monitoring Director	All requests must include the completed change criteria list.
Compliance Problems				
Occurrences	CPUC EM and EIs	Both project compliance teams	N/A	Occurrences are noted in the weekly and bi-weekly reports and any follow up actions are identified.
Incidents	CPUC EM and EIs	Both project compliance teams	PG&E TBD	Incidences noted during site inspections will be documented by the reporting party. Notification of the incident will occur no later than the following business day. If PG&E corrects the issue before the report is issued, it will be noted in the report. Refer to Section 3.2.5 of the MMCRP.
Noncompliance	CPUC PM and monitoring team	CPUC PM and Monitoring Director	PG&E PM and Environmental Manger	The CPUC monitoring team will issue a noncompliance memorandum in conjunction with the CPUC PM
Agency Jurisdiction Concerns	PG&E PM, Environmental Manager, or Compliance Supervisor	Applicable Agency	CPUC Monitoring Director or Manager	The resource agencies will be notified by PG&E of any issues that fall within their jurisdiction. The CPUC compliance team will also receive immediate notification of jurisdiction concerns. Communication between PG&E and the resource agencies will be documented and documentation will be submitted to the CPUC compliance team.
Dispute Resolution	All	CPUC Monitoring Director	CPUC PM and Environmental Manager	In the event that a dispute cannot be resolved in the field, the CPUC PM may issue a formal letter. Refer to Section 2.4.6 of the MMCRP.

APPENDIX D:
CRITERIA FOR A NOTIFICATION OF INCIDENT

Criteria for a Notification of Incident
Crazy Horse Canyon Switching Station Project

Note: Either complete this form or provide the information in an email documenting the incident.

Date of Incident:_____

Personnel/Contractor/Monitor/Other Personnel Present:_____

_____

_____

Location:_____

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

Detailed Description of Incident: Photos? Yes ☐ No ☐

_____
_____
_____
_____
_____
_____
_____
_____

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

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

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

*Provide compliance team with incident form by the following work day. Include copies in reporting period compliance reports.

APPENDIX E:
CRITERIA FOR VARIANCE REQUEST (OR MINOR PROJECT MODIFICATION), TEWS, OR MINOR FIELD CHANGE

CRITERIA FOR VARIANCE (OR MINOR PROJECT MODIFICATION) REQUEST, TEWS, OR MINOR FIELD CHANGE

Instructions

Provide the following information to the CPUC EM or CPUC Monitoring Director. Provide a detailed description for each item identified in the criteria list. If a criteria does not apply, clearly state why it does not apply. If items are left unanswered or the information provided is not adequate to show that the changes would not result in significant new impacts, the request may be denied or returned for additional information.

Criteria

1. Declare category of project change request: Project Variance, Temporary Extra Workspace (TEWS), or Minor Field Change
2. Provide a reason why the project change has been submitted under the chosen category (Project Variance, Temporary Extra Workspace (TEWS), or Minor Field Change)
3. Describe how the proposed change deviates from the project description and IS/MND requirements.
4. Provide date of request and any review time requests.
5. Provide the start and end dates of the project change, including daily time use.
6. Provide a detailed description of why the requested project change is needed.
7. Describe the requested project change in detail.
8. Provide a detailed description of the location. Provide maps, photos, and or other supporting documents.
9. Provide the current land use of the location.
10. Describe the expected condition of site after use.
11. Explain whether landowner notification and approval is required. If not, explain why; if so, provide documentation of notification and approval.
12. Provide survey information for environmental resources at the location. If a survey has been completed or was previously completed, be sure to describe the results for the area of interest.
13. Address the following resource questions for the proposed change:
    A. **Air Quality**: Would equipment be on site or idled for more than 5 minutes? Would there be dust-producing activities? Be sure to quantify air impacts.
    B. **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?
    C. **Cultural and Paleontological Resources**: Would clearing or grading be required?
    D. **Hazards**: Would additional hazards be associated?
    E. **Land Use and Recreation**: Would use of site block access to local land uses and recreational areas?
    F. **Noise**: Are noise-sensitive receptors (e.g., homes, schools, hospitals, churches, convalescent homes, parks, recreational areas) adjacent to the site?
    G. **Socioeconomics**: Would access to business be blocked? Would there be disruption of business operations?
    H. **Traffic**: Would parking be eliminated? Would increased construction traffic result in impacts to the existing flow of traffic? Is the site within a residential area?

I. **Visual**: Would lights at the site create glare for adjacent land uses (including roadways)? Would construction materials or equipment be visible to receptors or roadways?

J. **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?

Note all IS/MND project requirements, as well as permit conditions and mitigation measures apply, unless otherwise approved and specified. Jurisdictional agency approval may be required for project changes. Any approved activities or sites may be inspected by the CPUC EM at any time. Approved changes may be revoked at any time.

APPENDIX F:
MITIGATION MONITORING PROGRAM TABLE

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
Aesthetics			
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: 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	
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: 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	
Biological Resources			
APM Biology-13. PG&E will obtain coverage under the Construction Storm Water Permit Program and implement BMPs for erosion and sediment control.	Verify issuance of Construction Storm Water Permit through documentation.	Prior to construction	
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.	Verify content of training materials and submittal of training attendance sheets through documentation.	30 days prior to construction	
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.	Verify incorporation of program into SWPPP through documentation.	Prior to construction	
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	Verify completion of surveys through documentation.	No more than 5 days prior to construction	

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
woody debris, burrows, *etc.*, shall be thoroughly inspected. […].			
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. […].	Verify presence of flagging, signage, and/or fencing around CTS and CRLF aquatic habitat through on-site observations.	Prior to construction	
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.	Verify results of consultations through documentation.	Prior to construction	
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. […].	Verify completion of surveys through documentation.	Prior to construction between February 1 and August 15	
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. […].	Verify completion of surveys through documentation.	No more than 30 days prior to construction	
Mitigation Measure Biology-29 (proposed to supersede APM Biology-29).-Pre-construction surveys, *i.e.* 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. […].	Verify completion of surveys through documentation.	Prior to construction, prior to spring breeding season for bats	
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.	Verify completion of surveys through documentation.	Prior to construction	
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.	Verify completion of surveys through documentation.	Prior to construction	
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. […].	Verify completion of pre-construction nest survey through documentation.	No more than 30 days prior to construction	
Mitigation Measure Biology-37. Monitoring guidelines will be provided in an Avian Protection Plan to be submitted to the USFWS	Verify preparation of Avian Protection	Prior to construction	

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
and CDFG for review and approval prior to construction. Documentation of Plan approval will be submitted to the CPUC for recordkeeping.	Plan through documentation.		
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.	Verify content of detailed landscaping plans through documentation.	Prior to construction	
Cultural Resources			
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: 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. 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.	Verify content of training materials and submittal of training attendance sheets through documentation.	Prior to construction	
Geology and Soils			
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. […].	Verify content of ECSTP through documentation.	30 days prior to construction	

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
Hazards and Hazardous Materials			
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. […].	Verify content of Hazardous Substance Control and Emergency Response Plan through documentation.	30 days prior to construction	
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.	Verify content of Health and Safety Plan through documentation.	30 days prior to construction	
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	
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	
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	
Hydrology and Water Quality			
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.	Verify content of training materials and submittal of training attendance sheets through documentation.	Prior to construction	
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: 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: a. straw wattles, water bars, covers, silt fences, sensitive area access restrictions (e.g., flagging), or other	Verify submittal of Notice of Intent through documentation. Verify incorporation of measures into SWPPP through documentation.	Prior to construction	

Table 1: Preconstruction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
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. 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.			

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
Aesthetics			
APM Aesthetics-1. Construction activities will be kept as clean and inconspicuous as practical. Where practical, construction storage and staging will be screened from close-range residential views.	Verify construction activities are orderly through on-site observations.	During construction	
APM Aesthetics-2. All disturbed terrain at the switching station site will be restored through recontouring and revegetation using a seed and plant mixture approved by a qualified landscape/ horticultural professional.	Verify seed and plant mixture approval by a qualified professional through documentation. Verify recontouring and revegetation of disturbed terrain through on-site observations.	Prior to revegetation and post-construction	
APM Aesthetics-3. Project landscaping will screen views of the new facility and help integrate its appearance with the surrounding landscape setting. Project landscaping will involve the installation of informal groupings of native trees and shrubs around the perimeter of the switching station and along San Juan Grade Road in order to provide visual screening.	Verify vegetative screening of facility through on-site observations.	Post-construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
APM Aesthetics-4. Non-specular conductors will be used to reduce the potential for new sources of glare. A non-reflective finish will be used for switching station equipment to reduce the potential for new sources of glare.	Verify use of non-specular conductors through on-site observations.	Prior to installation of conductors	
APM Aesthetics-5. The project will incorporate use of an entry gate design to blend in with the existing rural setting found along on San Juan Grade Road and the general project area.	Verify design of entry gate through photodocumentation.	Prior to installation of entry gate	
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: 3. […]. 4. Construction equipment shall be removed from the project area when no longer needed. 5. All ground disturbances caused by construction, staging, and temporary access road construction shall be restored and revegetated at the earliest feasible time.	Verify restoration through on site observations. Verify revegetation through on site observations.	Prior to end of construction	
Mitigation Measure Aesthetics-7. PG&E shall use the following method to promote healthy revegetation of slopes constructed for the entrance road and switching station to reduce visual contrast: 6. In areas to be graded, all topsoil up to a depth of approximately three inches shall be removed, stockpiled, and used during site restoration, with the final fill layer of topsoil not exceeding four inches depth. Excess topsoil is to be removed from the site.	Verify implementation of measures through on-site observations.	During construction	
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: 7. […]. 8. New trees and shrubs to be installed at the site shall be locally grown, to the extent feasible. New plant material may include nursery grown stock and, if feasible, propagules locally collected and grown to a maximum dee-pot or tree-pot container size. Tree and shrub planting shall occur in fall or early winter when the rainy season has commenced.	Verify implementation of restoration and revegetation measures through on-site observations.	During construction	
Air Quality			
APM Air Quality-1. The project will implement all of the following Best Management Practices (BMPs): 9. Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil and wind exposure. 10. Suspend all grading activities during periods of high wind (over 15 miles per hour (mph)). 11. Apply chemical soil stabilizer on inactive construction areas (defined as disturbed lands within the project area that are unused for at least four consecutive days). 12. Apply non-toxic soil binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area. 13. Cover all trucks hauling dirt, sand or loose materials. 14. Plant vegetative ground cover in disturbed areas as soon as possible. 15. Cover inactive storage piles.	Verify implementation of BMPs through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
16. Install wheel washers at the entrance to construction sites for all exiting trucks. 17. Sweep public roads if visible soil material is carried out from the construction site. 18. Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. 19. The phone number of the Monterey Bay Unified Air Pollution Control District (MCUAPCD) shall be visible to ensure compliance with Rule 402 (nuisance). 20. Limit the area of earth disturbing activities at any one time.			
Greenhouse Gases			
APM GHG-1. PG&E will implement the following measures to address GHG emissions: 21. Identify park-and-ride facilities in the project vicinity and encourage construction workers to carpool to the job staging area to the extent feasible. The ability to develop an effective carpool program for the proposed project will depend upon the proximity of carpool facilities to the staging area, the geographical commute departure points of construction workers, and the extent to which carpooling will not adversely affect worker arrival time and the project's construction schedule. 22. Minimize unnecessary idling time – less than the 5-minute maximum idling required by law – through application of a "common sense" approach to vehicle use. If a vehicle is not required immediately or continuously for construction activities, its engine will be shut off. Minimize unnecessary construction vehicle idling time. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project will apply a "common sense" approach to vehicle use, so that idling is reduced as far as possible below the maximum of 5 consecutive minutes required by California law; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off. Construction foremen will include briefings to crews on vehicle use as part of pre-construction conferences. Those briefings will include discussion of a "common sense" approach to vehicle use. 23. Minimize construction equipment exhaust by using low-emission or electric construction equipment where feasible. Portable diesel fueled construction equipment with engines 50 hp or larger and manufactured in 2000 or later will be registered under the California Air Resources Board (CARB) Statewide Portable Equipment Registration Program, or will meet at a minimum U.S. Environmental Protection Agency (EPA)/CARB Tier 1 engine standards. Minimize construction equipment exhaust by using low-emission or electric construction equipment where feasible. Portable diesel fueled construction equipment with engines 50 hp or larger and manufactured in 2000 or later will be registered under the CARB Statewide Portable Equipment Registration Program, or will meet at a minimum USEPA/CARB Tier 1 engine standards. 24. Minimize welding and cutting by using compression of mechanical applications where practical and within standards. 25. Encourage use of natural gas powered vehicles for passenger cars and light duty trucks where feasible and available.	Verify implementation of BMPs through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
26. Encourage the recycling of construction waste where feasible.			
APM GHG-2. To further avoid and minimize potential SF_6 emissions, PG&E will incorporate the following measures: 27. Incorporate Crazy Horse Canyon Switching Station into PG&E's system-wide SF6 emission reduction program. Incorporate Crazy Horse Canyon Switching Station into PG&E's system-wide SF6 emission reduction program. Since 1998, PG&E has implemented a programmatic plan to inventory, track, and recycle SF6 inputs, and inventory and monitor SF6 leakage rates in order to facilitate timely replacement of leaking breakers. PG&E has improved its leak detection procedures and increased awareness of SF6 issues within the company. X-ray technology is now used to inspect internal circuit breaker components to eliminate dismantling of breakers, reducing SF6 handling and accidental releases. As an active member of EPA's SF6 Emission Reduction Partnership for Electrical Power Systems, PG&E has focused on reducing SF6 emissions from its transmission and distribution operations and has reduced the SF6 leak rate by 89 percent and absolute SF6 emissions by 83 percent. 28. Require that Crazy Horse Canyon Switching Station's breakers have a manufacturer's guaranteed leakage rate of 0.5 percent per year or less for SF6. 29. Maintain substation breakers in accordance with PG&E's maintenance guidelines. 30. Comply with California Air Resources Board Early Action Measures as these policies become effective.	Verify implementation of BMPs through on-site observations.	During construction	
APM GHG-3. In addition to these measures, PG&E is implementing the following voluntary company-wide actions to further reduce GHG emissions: 31. Pacific Gas & Electric Company supports the Natural Gas STAR, a program promoting the reduction of methane from natural gas pipeline operations. Since 1998, PG&E has avoided the release of thousands of tons of methane. 32. In June 2007, PG&E launched the ClimateSmart program, a voluntary greenhouse gas (GHG) emissions reduction program that allows its customers to balance out the GHG emissions produced by the energy they use, making their energy use "climate neutral." For ClimateSmart customers, PG&E calculates the amount needed to fund sufficient GHG emissions reduction projects in California to make their energy use "climate neutral." This is added to the customer's monthly energy bill and is tax deductable. 33. Pacific Gas & Electric Company is offsetting all of the GHG emissions associated with energy used in PG&E's buildings by participating in its ClimateSmart program. In 2007, this amounted to over 50,000 tons of CO_2 reductions. 34. California Air Resources Board plans to adopt AB-32 Early Action Measures to reduce GHG emissions. PG&E will implement the appropriate Early Action Measures as they become effective.	Verify participation in Natural Gas STAR program, participation in ClimateSmart program, and implementation of AB 32 Early Action Measures through documentation or on-site observations.	During construction and prior to operation	
Biological Resources			
APM Biology-1. 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 daily removal of trash through on-site observations.	During construction	
APM Biology-2. 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.	Verify locations of vehicle and equipment parking through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
APM Biology-3. 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.	Verify boundaries of the project area and vehicle speeds through on-site observations.	During construction	
APM Biology-4. 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.	Verify location of refueling and maintenance of vehicles and ensure no leaks occur through on-site observations.	During construction	
APM Biology-5. No pets or firearms will be permitted at the project site.	Verify there are no pets or firearms on site through on-site observations.	During construction	
Mitigation Measure Biology-6 (proposed to supersede APM Biology-6). Clearing and grading activities shall be limited to work areas only. Grading and vegetation-clearing activities shall be minimized along access roads and at pole and tower work areas. Vegetation shall be cut at ground level, leaving the existing root systems intact where possible.	Verify location of clearing and grading activities through on-site observations.	During construction	
APM Biology-7. In areas that will be restored following construction of the facility, PG&E will minimize clearing of oaks to only what is required to maintain a safe facility. In these areas, PG&E will endeavor to retain a representative sample of sizes, ages and species of oaks with special emphasis placed on retaining samplings.	Verify location of clearing activities.	During and post-construction	
Mitigation Measure Biology-8 (proposed to supersede APM Biology-8). […] No construction worker shall be involved in field operations without having participated in this special-status species/sensitive habitat informational training. […].	Verify content of training materials and submittal of training attendance sheets through documentation.	During construction	
APM Biology-9. A qualified biological monitor will be on site during all ground-disturbing construction activities in or near sensitive habitats previously identified. The monitor will ensure implementation of and compliance with all APMs. The monitor will have the authority to stop work or determine alternative work practices in consultation with agencies and construction personnel as appropriate if construction activities are likely to impact sensitive biological resources. The biological monitor will complete daily logs to document construction activities and environmental compliance. The daily logs will be included in the project report submitted to the appropriate agencies following completion of construction. The biological monitor will be responsible for reporting any capture and relocation, harm, entrapment, or death of a listed species to the United States Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Game (CDFG) and for reporting any permit violations in a timely manner and as indicated in their respective permits.	Verify biological monitoring activities through documentation.	During construction	
APM Biology-10. Sensitive resources identified during pre-construction surveys in the project vicinity will be mapped and clearly marked in the field. Such areas will be avoided during construction to the extent practicable and/or additional measures specific to sensitive species types as described herein and that may be required by the United States Army Corps of Engineers (USACE), USFWS, CDFG, and Regional Water Quality Control Board (RWQCB) permits, will be implemented to avoid or minimize impacts.	Verify field marking of sensitive resource areas through on-site observations.	During construction	
APM Biology-11. PG&E will design the project to avoid the intermittent drainages and seasonal wetlands to the extent practicable. However, where impacts to the drainages and wetlands cannot be avoided PG&E will provide compensation as required by the USACOE, USFWS, CDFG, and RWQCB.	Verify avoidance of drainages through on-site observations. Verify coordination with appropriate agency(ies) when avoidance is not possible, through documentation.	During construction	
APM Biology-12. Work in aquatic or wetland habitat is limited to the installation of the permanent access road in the wetland located	Verify surface water conditions in work	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
adjacent to San Juan Grade Road. All ground-disturbing work at this location will take place in dry conditions.	areas through on-site observations.		
APM Biology-13. PG&E will obtain coverage under the Construction Storm Water Permit Program and implement BMPs for erosion and sediment control.	Verify implementation of BMPs through on-site observations.	During construction	
APM Biology-14. 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 in the project area 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 completion and implementation of SWPPP through documentation and on-site observations.	During construction	
APM Biology-16. PG&E will prepare a Fire Prevention and Response Plan that will include reducing the potential for igniting combustible materials. The procedures will cover electrical hazards, flammable materials, smoking, vehicle and equipment access, and fire watches during construction and maintenance procedures during subsequent operation. Project personnel will be directed to park away from dry vegetation; not to smoke; and to equip vehicles with appropriate firefighting equipment; such as water dispensers and shovels, in times of high fire hazard.	Verify content and implementation of Fire Prevention and Response Plan through documentation and on-site observations.	During construction	
Mitigation Measure Biology-17 (proposed to supersede APMs Biology-17 and Biology-18). The applicant shall comply with the following surveys and procedures: 35. All special-status plant species will be clearly flagged prior to construction and impacts to special-status plants shall be avoided if possible. 36. Focused botanical surveys shall be conducted in July and September in work areas, along access roads, in temporary work areas, or within the right-of-way to determine if additional special-status plant species that have the potential to occur are present within the work areas. Any special-status plant species that are observed shall be enumerated and mapped. If surveys are not possible in all work areas during the months of July and September because of the construction schedule, information from past surveys will be used to delineate special-status plant populations. 37. Prior to construction, special-status plant species within the work areas that have the potential to be impacted shall be enumerated, photographed, and conspicuously flagged to maximize avoidance, as well as to determine the total number of individuals affected. Entire areas may be flagged to maximize avoidance. Timing of field surveys and flagging shall correspond with the blooming period when the species is most conspicuous and easily recognizable. If timing of field surveys and flagging must occur outside of the appropriate blooming period, the map and global positioning system locations collected during focused botanical surveys can be used to flag locations for avoidance. 38. Work areas within occupied habitat shall be limited to existing access roads and to the minimal area practical. Staging areas, spoils storage, and equipment/vehicle parking shall occur in designated areas outside of occupied habitat. 39. If possible for annual special-status plant species, timing of work activities within occupied habitat shall occur prior to the fall rains and after seeds have set to minimize project impacts on the seed bank. 40. Seeds from special-status plant species with mature seed that are likely to be impacted shall be collected and properly stored for post-construction propagation and re-establishment. Individuals that are likely to be	Verify USFWS approval of biologist and completion of survey through documentation. Verify compliance with biological procedures through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
impacted shall be translocated by digging up plants and replanting in suitable habitat under the supervision of the project biologist and with authorization from USFWS and/or CDFG. 41. If grading occurs in occupied habitat of special-status plant species, then the first 6 inches of topsoil shall be stored separately on site and protected from exotic weed seed dispersal. The purpose of the topsoil collection is to salvage any viable seeds in the seed bank by returning this soil horizon to its appropriate place in the profile. 42. In the event that any special-status plants cannot be avoided, PG&E shall consult with the USFWS and/or the CDFG (depending on whether the species is on the federal and/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 shall be informed of the results of any agency consultations. A mitigation and monitoring plan may be required that details impacts to special-status plant species and outlines remedial actions to mitigate impacts. Monitoring may be required for subsequent years to monitor mitigation activities and plant recovery. In addition to these avoidance measures, the following plant-specific measures shall be implemented: **Pajaro Manzanita and Pajaro Manzanita Chaparral** a. Removal of entire Pajaro manzanita plants from the ground shall be avoided and stumps and roots shall be retained. The applicant shall avoid damage to shrub branches where possible. The applicant shall hand-prune manzanita plants where clearance is necessary and leave stumps in place. Pruning shall not come within 6 inches of the ground surface to avoid disturbing the seed bank and to leave the stump in place. The applicant shall remove and discard all damaged branches to non-maritime chaparral sites to avoid manzanita dieback. b. If possible, pruning of manzanita shall occur after the plants have dispersed seed for the year (late summer/early fall), and before flowering begins (typically in December). Any branches with mature seed that are likely to be impacted shall be salvaged and the seed stored until work is complete. When the timing is appropriate after the start of the rainy season, collected seed shall be sown in appropriate locations on the project site as determined by the project biologist. c. A Revegetation and Monitoring Plan shall be prepared for the areas of temporary disturbance where Pajaro manzanita occurs and for other disturbed areas of the project site. This plan shall be implemented during construction and for 3 years thereafter. Disturbed areas, other than existing access roads, shall be stabilized and revegetated with appropriate (conducive with PG&E line clearance requirements) native species or as approved by the landowner. The Revegetation and Monitoring Plan shall include the planting of salvaged Pajaro manzanita seed if Pajaro manzanitas were impacted. If applicable, the site shall be monitored following construction to prevent establishment of weeds and to ensure the successful reestablishment of native species. **Monterey Spineflower** a. If impacts occur to the Monterey spineflower, the applicant shall monitor the response of plants in impacted areas in subsequent growing seasons following project construction. If necessary, the applicant shall also augment the Monterey spineflower population through supplemental seeding from garden-grown seed.			
APM Biology-19. Mobile equipment will not be parked overnight within 100 feet of aquatic habitat. Stationary equipment (e.g., pumps, generators) used or stored within 100 feet of aquatic habitat will be positioned over secondary containment.	Verify equipment storage locations through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
APM Biology-20. Best Management Practices such as silt fencing, hay bales, or fiber rolls, will be placed near the intermittent drainages and seasonal wetlands to prevent sedimentation runoff from flowing into Gabilan Creek.	Verify use of sedimentation barriers adjacent to intermittent drainages and seasonal wetlands through on-site observations.	During construction	
Mitigation Measure Biology-21 (proposed to supersede APM Biology-21). […]. If a CRLF or CTS is observed prior to or during construction, work within 250 feet of the animal sighting shall halt (once safe to do so) and shall not proceed until the USFWS/CDFG are contacted to determine what actions shall be taken, unless such actions have been approved by USFWS/CDFG in advance of project construction. If no CRLF or CTS are observed during the pre-construction surveys, construction shall commence as scheduled.	Verify compliance with biological procedures through on-site observations.	During construction	
Mitigation Measure Biology-22 (proposed to supersede APM Biology-22). Ground-disturbing construction activities within 600 feet of suitable CRLF and CTS aquatic habitat shall not occur during the wet season when CRLF and CTS are most active (i.e., when they are moving to and from breeding sites and foraging further upland from aquatic features), and shall be limited to the time period from May 1 to October 15 or as approved by CDFG and USFWS.	Verify timing and approval of construction activities within 600 feet of suitable aquatic habitat for CRLF and CTS through documentation and on-site observations.	During construction between May 1 and October 31	
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. These areas shall be avoided by all construction personnel. The fencing shall be inspected before the start of each workday and maintained until completion of the activity. Once the project site is prepared and work is only occurring in the switching station shall the fencing be removed. 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 shall be used for erosion control measures.	Verify that sensitive resource areas are marked in the field and avoided through on-site observations.	During construction	
APM Biology-24. 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.	Verify timing of construction activities through on-site observations.	During construction within 300 feet of suitable aquatic habitat	
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. To the extent possible, working in the vicinity of active nests shall be avoided; however, if avoidance is not practicable, a buffer zone of 250 feet shall be maintained around the active nest to prevent nest abandonment or disturbance. 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 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.	Verify implementation of measures through on-site observations.	During construction	
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 active burrows are found near a work area, work in the vicinity of the burrows will be limited as follows: 43. No disturbance will 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. Based on the site conditions and sensitivity of individual owl(s), the non-disturbance buffer may be extended if requested by CDFG. 44. The limits of the exclusion zone in the project work area will be clearly marked with signs, flagging and/or	Verify implementation of measures through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
fencing. 45. If work within these limits is unavoidable while burrows are active, work will 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. Through communication with the Resident Engineer or their designee, the biologist will have the authority to stop work if deemed necessary for any reason to avoid impacts to burrowing owls and will advise the Resident Engineer or designee on how to proceed accordingly. 46. Passive relocation of owls may occur during the non-breeding season (September 1 through January 31) only with approval from CDFG. Passive relocation would include installing one-way doors on the entrances of burrows. The design of one-way doors should be determined in cooperation with CDFG. The one-way doors would be left in place for one week and monitored a minimum of twice daily for signs of birds that are unable to exit the burrow to ensure the owls have vacated the nest site. Owls would not be relocated during the breeding season, *i.e.* from February 1 to August 31. If burrowing owls are passively relocated, CDFG will be contacted to determine if compensation for loss of burrowing owl breeding burrows and surrounding habitat is necessary.			
Mitigation Measure Biology-29 (proposed to supersede APM Biology-29). Pre-construction surveys, *i.e.* visual encounter surveys using binoculars, shall be conducted for all areas that provide suitable bat roosting habitat, […]. If suitable roosting habitat is identified, the following measures shall be conducted: 47. A qualified biologist shall survey suitable roost sites immediately prior to the removal or grading of rock outcroppings, debris piles, man-made structures, *etc.* 48. Removal of suitable tree roost sites shall be conducted by first removing limbs smaller than 3 inches in diameter and peeling away loose bark. The tree shall then be left overnight to allow any bats using the tree/snag to find another roost during their nocturnal activity period. 49. A qualified biologist shall survey the trees/snags a second time the following morning prior to felling and removal. 50. Trees shall be removed outside of the breeding season, *i.e.* from September 1 to March 1, to avoid disturbance to maternal colonies.	Verify implementation of measures through on-site observations.	During construction	
Mitigation Measure Biology-30 (proposed to supersede APM Biology-30). If following the implementation of the agency-approved Avian Protection Plan and implementation of PG&E's most current version of Bird and Wildlife Protection Standards, a bird electrocution still occurs at the project site, PG&E will implement the following corrective actions as outlined in the Avian Protection Plan Implementation document: 51. PG&E will notify the USFWS and CDFG of a bird strike for any special-status species and any raptor species within 3 working days of the discovery. 52. If a raptor or a special status species bird is electrocuted on distribution (pole or mid-span), transmission, or substation facilities, the first line supervisor or designee (incident investigator) shall visit the incident site as soon as possible following the incident. The incident investigator shall be qualified, because of knowledge, training, and work experience, to evaluate and assess bird-related incidents, poles, or other structures. 53. The incident investigator will recommend retrofits with avian-safe devices if the incident involved a raptor and schedule any retrofit work to be completed as soon as practical, based on material availability, facility	Verify implementation of Avian Protection Plan through documentation and on-site observations.	After a bird electrocution event	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
accessibility, clearances, etc. 54. If avian program management personnel determine that certain poles or structures present a particularly high risk to raptors, they may require that work to make the poles or structures avian-safe be completed within 30 days or less. The criteria for making this determination may include, but is not limited to, the following circumstances: b. Electrocuted eagle, threatened, or endangered species c. Multiple raptor electrocutions at the same location d. Multiple electrocutions in close proximity and within a recent time frame e. Agency requests			
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. […]. If it is determined to be an active breeding den, a 250 foot exclusion buffer will be established and CDFG will be contacted to determine how to proceed. […].	Verify that exclusion fencing is maintained and exclusion areas are avoided.	During construction	
Mitigation Measure Biology-32 (proposed to supersede APM Biology-32). PG&E shall clean equipment and vehicles prior to arriving on site. Equipment shall be inspected and cleaned as needed prior to use in areas with rare plants. All plant material (e.g., straw, mulch, and seeds) used for erosion control and/or road maintenance shall be weed-free. If weed-free straw or mulch is not available, rice straw and mulch shall be used. The project biologist shall ensure that the spread or introduction of invasive exotic plant species is avoided to the maximum extent possible. When practicable, invasive exotic plants in the project areas shall be removed. Seed mixes shall be approved by a biologist prior to application. Where possible, local or on-site seed sources shall be used.	Verify cleaning of equipment prior to arriving on site through on-site observations.	During construction	
Mitigation Measure Biology-33. A USFWS/CDFG-approved biologist shall be present onsite to monitor for CRLF and CTS. Through communication with the Resident Engineer or their designee, the biologist may stop work if deemed necessary for any reason to protect listed species and shall advise the Resident Engineer or designee on how to proceed accordingly. The biologist shall be present during all construction activities where take of a listed species could occur. The biologist shall conduct clearance surveys at the beginning of each day and regularly throughout the workday when construction is occurring within or immediately adjacent to suitable CRLF and CTS habitat.	Verify through on-site observations.	During construction	
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. […]. If a southwestern pond turtle, coast range newt, or black legless lizard is observed, work within 250 feet of the animal shall halt (once safe to do so) and shall not proceed until the CDFG is contacted to determine what protective actions shall need to be taken unless protective actions have been approved by CDFG in advance of project construction. […].	Verify implementation of measures through on-site observations.	Prior to and during construction	
Mitigation Measure Biology-35. A qualified biologist shall be present onsite to monitor for southwestern pond turtles, black legless lizards, and coast range newt. Through communication with the Resident Engineer or their designee, the biologist may stop work if deemed necessary for any reason to protect these species and shall advise the Resident Engineer or designee on how to proceed accordingly. The biologist shall be present during all construction activities that may impact these species. The biologist shall conduct clearance surveys at the beginning of each day and regularly throughout the workday when construction is occurring within or immediately adjacent to suitable southwestern pond turtle, black legless lizard, and coast range newt habitat.	Verify implementation of measures through on-site observations.	During construction	
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	Verify implementation of measures	Prior to and during construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
within one mile of the project footprint for golden eagles and white-tailed kites, unless otherwise directed by CDFG and/or USFWS. […]. Unless otherwise approved by USFWS and/or CDFG, if active nests are found, they shall be monitored and, if it is determined that construction activities are causing nest disturbance, a no-disturbance buffer of 1,000 feet around eagle nests and/or 500 feet around white-tailed kite nests shall be observed until the young have fledged.	through on-site observations.		
Mitigation Measure Biology-38. To reduce the risk of bird electrocution and bird strikes, installation of the new distribution line and the reconfigured power lines will conform to PG&E's most current version of Bird and Wildlife Protection Standards, and may include the use of bird guards.	Verify through on-site observations.	Prior to and during construction	
Mitigation Measure Biology-39. To minimize disturbance due to helicopter operations, PG&E will avoid helicopter flights near known active nesting bird sites as determined in consultation with the USFWS and/or CDFG.	Verify through on-site observations.	During construction	
Mitigation Measure Biology-40. Oak tree removal shall be avoided to the maximum extent possible. In agreement with the Monterey County Preservation of Oak and Other Protected Trees Ordinance, oak trees will be replaced at a one-to-one ratio or as determined in consultation with Monterey County. […].	Verify implementation of landscaping plan through on-site observations.	During construction	
Cultural Resources			
Mitigation Measure Cultural-2 (proposed to supersede APM Cultural-2). In the unlikely event that previously unidentified cultural or paleontological resources are uncovered during implementation of the project, all work within 165 feet (50 meters) of the discovery shall be halted and redirected to another location. PG&E's cultural resources specialist, paleontological resources specialist, or his/her designated representative shall inspect the discovery and determine whether further investigation is required. If the cultural discovery can be avoided and no further impacts would occur, then the cultural resource shall be documented on California Department of Parks and Recreation cultural resource record forms and no further effort shall be required. If the cultural resource cannot be avoided and may be subject to further impact, PG&E shall evaluate the significance and CRHR eligibility of the resource and implement data recovery excavation or other appropriate treatment measures if warranted. Similarly, if the paleontological resource is significant, but can be avoided and no further impacts shall occur, then the paleontological resource shall be documented in the appropriate paleontological resource records and no further effort shall be required. If the paleontological resource is significant, but cannot be avoided and may be subject to further impact, PG&E shall evaluate the significance of the paleontological resource and implement data recovery excavation or other appropriate treatment measures as recommended by a qualified paleontologist.	Verify halt of construction activities and appropriate notification of agencies through documentation and on-site observations.	During the discovery of previously unidentified cultural or paleontological resources	
APM Cultural-3. In the event human remains are encountered during the project, work within 50 feet of the find will be halted and the County Coroner will be notified immediately. Work will remain suspended until the Coroner can assess the remains. In the event the remains are determined to be prehistoric in origin, the Coroner will notify the Native American Heritage Commission, who will then designate a Most Likely Descendent. The Most Likely Descendent will consult with PG&E's archaeologist to determine further treatment of the remains.	Verify halt of construction activities and appropriate notification of agencies through documentation and on-site observations.	During the discovery of human remains	
Geology and Soils			
APM Geology-1. Surface disturbance will be minimized to the extent consistent with safe and efficient completion of the project scope of work.	Verify minimization of ground disturbance through on-site observations.	During construction	
APM Geology-2. Topsoil will be salvaged from areas where grading would otherwise result in loss of topsoil, and the salvaged soil will be used to reclaim areas of temporary construction disturbance. Once temporary surface disturbances are complete, areas that will not be subject to additional disturbance will be stabilized by landscaping.	Verify appropriate salvaging and use of topsoil through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
APM Geology-3. Erosion control BMPs will be implemented where grading occurs.	Verify implementation of BMPs through on-site observations.	During construction	
Mitigation Measure Geology-4. Construction slopes and existing natural slopes impacted by construction operations (e.g., cut and fill and road construction) shall be evaluated for stability. Construction slopes and grading plans shall be designed to limit the potential for slope instability and minimize the potential for erosion and flooding during construction. Construction activities likely to result in slope instability shall be suspended, as necessary, during and immediately following periods of heavy precipitation when unstable slopes are more susceptible to failure.	Verify evaluation of slope stability through documentation.	During construction	
Mitigation Measure Geology-5. Where soft or loose soils are encountered during construction, appropriate measures shall be implemented to avoid, accommodate, replace, or improve soft or loose soils. Such measures may include, but are not limited to, the following: 55. Locating construction equipment and structures away from areas of soft and loose soil, if possible 56. Over-excavating soft or loose soils and replacing them with engineered backfill 57. Increasing the density and strength of soft or loose soils through mechanical vibration and/or compaction 58. Treating soft or loose soils in place with binding or cementing agents 59. If possible, scheduling construction activities in areas where soft or loose soils are encountered for the dry season to allow safe and reliable equipment access	Verify compliance with measures through on-site observations.	During construction	
Mitigation Measure Geology-6. PG&E shall prepare an ECSTP as an element of the SWPPP describing BMPs to be used during construction. PG&E shall ensure all BMPs are inspected before and after each storm event, maintained on a regular basis, and replaced as necessary through the course of construction. […]. Erosion-minimizing efforts may include, but not be limited to, measures such as: 60. Avoiding excessive disturbance of steep slopes 61. Defining ingress and egress within the project area 62. Implementing a dust control program during construction 63. Restricting access to sensitive areas (e.g., using silt fencing for the protection of wetland features) 64. Using vehicle mats in wet areas 65. Revegetating disturbed areas, where applicable, following construction 66. 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 shall be installed before clearing begins during the wet season 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, shall remain in place until disturbed areas have stabilized. Such temporary measures shall be placed and monitored by a qualified inspector to ensure effectiveness and timely repair as needed. PG&E shall keep water equipment such as water trucks and water truck filling areas well maintained and shall make repairs as soon as possible; use water minimally for dust control and to clean construction areas; sweep and vacuum to the maximum extent possible; and direct runoff to areas where it can be reused or absorbed into the ground. Water for dust control shall be applied at a rate that would not lead to significant water runoff or potentially cause a nuisance. The ECSTP shall be […] revised and updated as needed, and resubmitted to the CPUC if construction activities change to the point	Verify implementation of ECSTP through on-site observations.	During construction	

Table 2: Construction Mitigation Measures

APMs/Mitigation Measure	Implementation	Schedule	Status
that the existing approved ECSTP does not adequately address the project.			
Hazards and Hazardous Materials			
APM Hazards-1. PG&E will submit a Hazardous Substance Control and Emergency Response Plan[…] The plan will identify methods and techniques to minimize the exposure of the public to potentially hazardous materials during all phases of project construction through operation. The plan will require implementing appropriate control methods and approved containment and spill-control practices (i.e., spill control plan) for construction and materials stored on-site. All hazardous materials and hazardous wastes will be handled, stored, and disposed of, in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. If it is necessary to store any chemicals on-site, they will be managed in accordance with all applicable regulations. Material Safety Data Sheets will be maintained and kept available on-site, as applicable.	Verify implementation of Hazardous Substance Control and Emergency Response Plan through on-site observations.	During construction	
APM Hazards-2. PG&E will prepare a site-specific Health and Safety Plan (HSP) to ensure that potential safety hazards will be kept at a minimum. […]	Verify implementation of Health and Safety Plan through on-site observations.	During construction	
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. […]	Verify implementation of Fire Prevention and Response Plan through on-site observations.	During construction	
APM Hazards-5. A monitoring program will be implemented to ensure that the plans are followed throughout the construction period. BMPs, as identified in the project's SWPPP and Erosion Control and Sediment Transport Plan, will be implemented during the project to minimize the risk of an accidental release and to provide the necessary information for emergency response.	Verify implementation of plans through on-site observations.	During construction	
Noise			
APM Noise-1. "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 observations.	During construction	
APM Noise-2. PG&E will limit construction to the hours between 7 a.m. and 7 p.m., Monday through Saturday, to the extent feasible. If nighttime work is needed because of clearance restrictions on the power line, PG&E will take appropriate measures to minimize disturbance to local residents, including contacting nearby residences to inform them of the work schedule and probable inconveniences.	Verify timing of construction activities through on-site observations.	During construction	
APM Noise-3. PG&E will encourage construction crews to limit unnecessary engine idling (see Air Quality measures).	Verify no excessive idling through on-site observations.	During construction	
APM Noise-4. Compressors and other small stationary equipment will be shielded with portable barriers in proximity to residential areas.	Verify use of portable barriers for stationary equipment through on-site observations.	During construction	