

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 18, 2021

Mr. Brandon Liddell  
245 Market Street  
San Francisco, CA 94105

**RE: Notice to Proceed #1 for the Ravenswood-Cooley Landing Reconductoring Project**

Dear Mr. Liddell,

Pursuant to the California Environmental Quality Act (CEQA), the California Public Utilities Commission (CPUC) prepared an Initial Study/Mitigated Negative Declaration (IS/MND) for Pacific Gas and Electric Company's (PG&E's) Ravenswood-Cooley Landing Reconductoring Project (A. 17-12-010). On April 4, 2019, the CPUC issued a decision to adopt the Final IS/MND and grant PG&E a Permit to Construct the project (Decision 19-03-018). The CPUC adopted the mitigation measures (MMs) and applicant proposed measures (APMs) identified in the IS/MND as conditions of project approval, as well as a Mitigation Monitoring and Reporting Program (MMRP) to ensure compliance with the MMs and APMs pursuant to Public Resources Code § 21081.6 and § 15097 of the CEQA Guidelines.

A detailed Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) was developed for the project with direct participation with PG&E staff. The MMCRP defines specific procedures that are part of the adopted program including the Notice to Proceed (NTP) process, which requires PG&E to obtain approval from the CPUC prior to initiating specific actions covered by the CPUC's decision on the project. The purpose of the NTP process is to ensure all pre-construction phase requirements are completed and the proposed actions are consistent with the approved project as specified in the Final IS/MND. Any deviation from the approved project must be authorized by the CPUC through the Minor Project Refinement (MPR) process defined in the MMCRP or the CPUC's Petition for Modification process (CPUC Rule 16.4).

On July 20, 2021, PG&E submitted the first NTP request for the project (NTP #1) requesting CPUC authorization to initiate foundation improvement activities at Towers #1 and #9, as described in the Final IS/MND. A copy of the NTP request materials is enclosed as Attachment 1. All other project activities, including reconductoring and foundation improvement activities at Towers #2 and #8, are not included under this NTP and will require future NTP authorization from the CPUC.

This letter serves to inform you that the CPUC has reviewed and approved PG&E's request for NTP #1 with standard and specific conditions. These conditions are identified in the last section of this letter. The results of the CPUC's review of NTP #1 and the status of applicable pre-construction requirements are provided in Attachment 2, which include updated requirement summary tables from the MMCRP.

Actions that have been reviewed and approved in this NTP are summarized below. Actions that are pending CPUC review and approval are also identified for clarity.

### **Actions Reviewed and Approved in NTP #1**

This NTP authorizes PG&E to initiate project activities associated with foundation improvements at Towers #1 and #9, as described in the Final IS/MND. Actions that were reviewed and authorized in this NTP include:

- Reinforcing existing foundations at Towers #1 and #9 to support the new conductors.
- Modifying Towers #1 and #9 to support the new conductors and provide required minimum conductor clearance.

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

No other NTP requests have been submitted to date.

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

PG&E must submit NTP requests and obtain approval from the CPUC prior to initiating all other actions or working in additional areas that are not described above. Actions described in the Final IS/MND that have not been authorized include:

- Reconductoring the two 115-kV Ravenswood-Cooley Landing Line circuits with new 477 kcmil steel-supported aluminum conductors.
- Reinforcing existing foundations at Towers #2 and #8 to support the new conductors.
- Modifying Towers #2 and #8 to support the new conductors and provide required minimum conductor clearance.
- Installing a new optical fiber ground wire at each project tower.
- Installing new tubular steel poles, and modifying or replacing certain related equipment at Ravenswood Substation and Cooley Landing Substation.
- Utilizing temporary guard structures, snub poles, and pull sites.

### **Conditions of Approval**

This NTP is approved with the following standard conditions:

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

Mr. Brandon Liddell

August 18, 2021

Page 3

This NTP is also approved with the following specific conditions:

5. **Caltrans Notification.** Caltrans encroachment permit #04-19-6-UF-3374 was submitted with NTP Request Package #1. A notification shall be sent to Caltrans a minimum of 7 days prior to the start of covered work, as described in the permit.
6. **WEAP Brochure.** Slides for a WEAP training presentation were submitted with NTP Request Package #2. A brochure for the WEAP training shall be submitted for CPUC review prior to the start of construction.
7. **Dewatering Plan.** If a dewatering plan is determined to be necessary, it shall be submitted to the RWQCB at least 14 days prior to any dewatering in Waters of the State.
8. **Public Noticing and Signage.** Prior to the start of construction, nighttime work, or helicopter activities, PG&E shall complete the corresponding public noticing and signage installation requirements as specified in Attachment 2, APM AIR-1, and MM NO-1.
9. **Biological Avoidance and Minimization.** Prior to the start of construction, a qualified biologist shall flag access routes and locations of known invasive weed populations, direct location of vegetation protection mats, and determine if hand-removal of vegetation and onsite biological monitoring are required, as specified in Attachment 2, APM BIO-2, APM BIO-5, and MM BIO-2.
10. **Compliance Monitoring and Reporting.** PG&E shall initiate compliance monitoring and reporting requirements identified in the MMCRP starting on the first day construction activities occur. Monitoring and reporting shall continue for the entire duration of construction, including periods of inactivity, and until the CPUC deems these requirements complete.

Please direct any questions related to this NTP to me at [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov).

Sincerely,

Michael Rosauer  
Project Manager  
Energy Division, CEQA Unit

cc: Aaron Lui, Panorama Environmental  
Susanne Heim, Panorama Environmental  
Sean Pagnon, Panorama Environmental  
Thomas Davis, Stantec  
Danielle Althaus, Stantec

Mr. Brandon Liddell

August 18, 2021

Page 4

Attachment 1: PG&E Requests for NTP #1

Attachment 2: MMCRP Tracking Table Updated for NTP #1



**Brandon Liddell**  
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July 20, 2021

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

**Subject: Ravenswood-Cooley Landing Reconductoring Project  
Notice to Proceed Request Package No. 1 (NTP #1)**

Dear Mr. Rosauer,

The California Public Utilities Commission (CPUC) issued a decision granting Pacific Gas and Electric Company (PG&E) a Permit to Construct the Ravenswood-Cooley Landing Reconductoring Project (project) (Application A.17-12-010) pursuant to General Order 131-D. The CPUC Decision adopted the Final Mitigated Negative Declaration (MND), released in October 2018, in its entirety. The Final MND includes a Mitigation Monitoring, Compliance and Reporting Plan (MMCRP), and the CPUC adopted the MMCRP as part of its approval of the project. In order for PG&E to commence construction, PG&E needs to provide the CPUC with several preconstruction requirements per the MMCRP. This is the first package submittal to meet some of these requirements.

<b>NTP Request Number:</b>	1
<b>Date Submitted to CPUC:</b>	July 20, 2021
<b>Requested Approval Date of Package #1:</b>	August 20, 2021
<b>Anticipated Start/End Date for Proposed Actions:</b>	September 16, 2021

<b>Description of the proposed actions requested in the NTP:</b>
This is an initial application package to allow CPUC to review the attached supporting documentation in advance of issuing a NTP. Additional supporting documents will be submitted prior to construction activity.
<b>Summary of previously authorized actions (if applicable) as detailed in NTP Authorization Letters:</b>
No NTP Authorization Letters have previously been issued.
<b>Summary of actions that have not been proposed or authorized that must be included with future NTP requests:</b>

All project actions will be included in forthcoming NTP requests.
<b>Summary of outstanding requirements and documentation not included with the NTP package, and the anticipated dates it will be provided:</b>
<ul style="list-style-type: none"> <li>• See Table C-1 and C-2 attachment.</li> </ul>
<b>Minor Project Refinements or Temporary Extra Workspace related to the proposed actions:</b>
N/A
<b>List of Attachments provided in NTP #1 package and anticipated attachments provided in NTP #2 package:</b>
<ol style="list-style-type: none"> <li>1. ACOE NWP</li> <li>2. Bay Area HCP Measures Table</li> <li>3. USFWS Section 7 Consultation</li> <li>4. FAA determinations</li> <li>5. BCDC Programmatic Permit</li> <li>6. RWQCB 401 Certification</li> <li>7. Caltrans encroachment permit</li> <li>8. SWPPP WDID #- Note will be submitted in NTP package #2</li> <li>9. SFPUC Revocable Permit- Note will be submitted in NTP package #2</li> <li>10. Biologist resume</li> <li>11. Worker Environmental Awareness Training- Note will be submitted in NTP package #2</li> <li>12. Geological design measure letter</li> <li>13. Bay Road Comprehensive Site Management Plan</li> <li>14. Hazardous Substances Control and Emergency Procedures- Note will be submitted in NTP package #2</li> <li>15. SWPPP#- Note will be submitted in NTP package #2</li> <li>16. Transportation Management Plan- Note will be submitted in NTP package #2</li> <li>17. EcoAtlas data input- Email submitted to RWQCB</li> <li>18. Conservation landowner park management coordination notifications- Note: Still need ABAG Notification which will be submitted in NTP package #2</li> <li>19. FAA coordination- Note will be submitted in NTP package #2</li> <li>20. Local airport coordination- Note will be submitted in NTP package #2</li> <li>21. RWQCB Mitigation Receipt</li> <li>22. Pre-project photo documentation per 401 Certification- Note will be submitted in NTP package #2</li> <li>23. SWRCB permit registration- Note will be submitted in NTP package #2</li> <li>24. Bay Trail documentation- Note will be submitted in NTP package #2</li> <li>25. Table C1-C2- Updated 07/19/21</li> </ol>

PG&E plans to submit another package with the remaining outstanding preconstruction requirements in early August 2021. Please do not hesitate to contact me directly at (415) 990-6001 if you have any questions.

Sincerely,



Brandon Liddell  
Senior Land Planner

Enclosure:

Link to Sharedrive provided in email correspondence where attachments are stored.

cc:

Aaron Lui, Panorama Environmental  
Sussane Heim, Panorama Environmental  
Sean Pagnon, Panorama Environmental  
Thomas Davis, Stantec  
Danielle Althaus, Stantec



**Brandon Liddell**  
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August 9, 2021

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

**Subject: Ravenswood-Cooley Landing Reconductoring Project  
Notice to Proceed Request Package No. 1 (Submittal #2)**

Dear Mr. Rosauer,

The California Public Utilities Commission (CPUC) issued a decision granting Pacific Gas and Electric Company (PG&E) a Permit to Construct the Ravenswood-Cooley Landing Reconductoring Project (project) (Application A.17-12-010) pursuant to General Order 131-D. The CPUC Decision adopted the Final Mitigated Negative Declaration (MND), released in October 2018, in its entirety. The Final MND includes a Mitigation Monitoring, Compliance and Reporting Plan (MMCRP), and the CPUC adopted the MMCRP as part of its approval of the project. In order for PG&E to commence construction, PG&E needs to provide the CPUC with several preconstruction requirements per the MMCRP. This is the first package submittal to meet some of these requirements.

PG&E is requesting three separate NTPs from the CPUC. The first NTP will allow for foundation work to begin on Towers 1 and 9. The second NTP will allow for foundation work to commence on Tower 2 and 8. The third and final NTP will allow for helicopter flight operations for the project.

<b>NTP Request Number:</b>	1, Submittal #2
<b>Date Submitted to CPUC:</b>	August 9, 2021
<b>Requested Approval Date of Package #1:</b>	August 19, 2021
<b>Anticipated Start/End Date for Proposed Actions:</b>	September 16, 2021

**Description of the proposed actions requested in the NTP:**

This is an second application package to allow CPUC to review the attached supporting documentation in advance of issuing an NTP. Additional supporting documents will be submitted prior to construction activity.

**Summary of previously authorized actions (if applicable) as detailed in NTP Authorization Letters:**



No NTP Authorization Letters have previously been issued.

**Summary of actions that have not been proposed or authorized that must be included with future NTP requests:**

All project actions will be included in forthcoming NTP requests.

**Summary of outstanding requirements and documentation not included with the NTP package, and the anticipated dates it will be provided:**

- See Table C-1 and C-2 attachment.

**Minor Project Refinements or Temporary Extra Workspace related to the proposed actions:**

N/A

**List of Attachments provided in NTP #1 Submittal #1 and attachments provided in NTP #1 Submittal #2:**

1. ACOE NWP – Note was submitted as NTP #1, Submittal #1
2. Bay Area HCP Measures Table – Note was submitted as NTP #1, Submittal #1
3. USFWS Section 7 Consultation – Note was submitted as NTP #1, Submittal #1
4. FAA determinations – Note was submitted as NTP #1, Submittal #1
5. BCDC Programmatic Permit – Note was submitted as NTP #1, Submittal #1
6. RWQCB 401 Certification – Note was submitted as NTP #1, Submittal #1
7. Caltrans encroachment permit – Note was submitted as NTP #1, Submittal #1
8. SWPPP WDID #- Note will be submitted in NTP #1, Submittal #2
9. SFPUC Revocable Permit- Note will be submitted in NTP #2, Submittal #1
10. Biologist resume – Note was submitted as NTP #1, Submittal #1
11. Worker Environmental Awareness Training- Note will be submitted in NTP #1, Submittal #2
12. Geological design measure letter – Note was submitted as NTP #1, Submittal #1
13. Bay Road Comprehensive Site Management Plan – Note was submitted as NTP #1, Submittal #1
14. Hazardous Substances Control and Emergency Procedures- Note will be submitted in NTP #1, Submittal #2
15. SWPPP#- Note will be submitted in NTP #1, Submittal #2 (refer to Item 8)
16. Transportation Management Plan- Note will be submitted in NTP #2, Submittal #1
17. EcoAtlas data input- Email submitted to RWQCB – Note was submitted in NTP #1, Submittal #1
18. Conservation landowner park management coordination notifications- Note: ABAG Notification will be submitted in NTP #1, Submittal #2, other landowner notification previously submitted in NTP #1, Submittal #1
19. FAA coordination- Note will be submitted in NTP #3, Submittal #1
20. Local airport coordination- Note will be submitted in NTP #3, Submittal #1
21. RWQCB Mitigation Receipt – Note was submitted as NTP #1, Submittal #1
22. Pre-project photo documentation per 401 Certification- Note will be submitted in

NTP #1, Submittal #2

23. SWRCB permit registration- Note will be submitted in NTP #1, Submittal #2 (refer to Item 8)
24. Bay Trail documentation- Note will be submitted in NTP #1, Submittal #2
25. Table C1-C2- Updated 08/09/2021

PG&E plans to submit another package with the remaining outstanding preconstruction requirements in early August 2021. Please do not hesitate to contact me directly at (415) 990-6001 if you have any questions.

Sincerely,



Brandon Liddell  
Senior Land Planner

Enclosure:

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Danielle Althaus, Stantec

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN**

**Table C-1 Permits and Approvals That May Be Required for The Project**

Regulatory Authority	Agency	Jurisdiction/Purpose	Project Requirements	Status
<b>Federal</b>				
Section 404 Nationwide Permit	U.S. Army Corps of Engineers (USACE)	Work in “waters of the United States,” including wetlands.	For access required across marshlands that result in placement of fill.	Complete USACE authorization dated December 16, 2019 was submitted with NTP Request Package #1.
Bay Area Habitat Conservation Plan	U.S. Fish and Wildlife Service (USFWS)	Impacts on federally listed species or critical habitat.	Implementation of measures and recordation of habitat impacts for California Ridgeway’s rail and salt marsh harvest mouse.	Complete Relevant BAHCP measures were incorporated into the Final MND MMs and AMMs, which will be implemented under the project.
Section 7 Consultation	U.S. Fish and Wildlife Service (USFWS)	Impacts on federally listed species or critical habitat.	Implementation of measures and recordation of habitat impacts for western snowy plover.	Complete A formal concurrence letter from USFWS dated November 27, 2019 was submitted with NTP Request Package #1 confirming no adverse impact on the species with the implementation of the proposed avoidance measures.
Section 106 Consultation (National Historic Preservation Act [NHPA])	State Historic Preservation Officer (SHPO)	Requires federal agencies to take into account the effects of their undertakings on historic properties.	The USACE may consult with the SHPO due to the age of the existing line to be replaced along the project alignment.	Not applicable Section 106 Consultation was determined to be unnecessary by USACE.
Notice of Proposed Construction or Alteration under Federal Aviation Regulations Part 77	Federal Aviation Administration (FAA)	Regulations apply to poles and/or towers over 200 feet in height above ground level at its site, or within certain proximities to local Airports.	Alignment structures within 20,000 feet of Palo Alto Airport require filing with the FAA.	Complete PG&E submitted pre-construction notifications to FAA, and FAA provided corresponding determinations of no hazard to air navigation for project poles. These FAA determinations were submitted with NTP Request Package #1. Form 7460-2 shall be filed with FAA for each structure within 5 days after the construction reaches its greatest height.
<b>State</b>				
McAteer-Petris Act and the San Francisco Bay Plan, Permit No. M87-74(A)	Bay Area Conservation and Development Commission (BCDC)	Maintenance activities for PG&E facilities within the 100-foot shoreline band	Comply with permit terms relating to ten-year maintenance activities.	Complete BCDC Permit No. M1987.074.14A, Amendment No. Fourteen, was submitted with NTP Request Package #1. The permit expires on March 1, 2022.

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN**

Regulatory Authority	Agency	Jurisdiction/Purpose	Project Requirements	Status
Permit to Construct, PTC (GO-131-D)	California Public Utilities Commission (CPUC)	Construction, modification, or alteration of power line facilities.	A PTC is required under the CPUC's General Order No. 131-D, Section III.B.	Complete The project Notice of Determination was filed at the State Clearinghouse on April 3, 2019.
Section 401 Water Quality Certification	San Francisco Bay Regional Water Quality Control Board (RWQCB)	Consistency with state water quality standards.	Water Quality Certification would be required prior to obtaining a Section 404 Permit from the USACE, if required.	Complete A RWQCB Certification obtained December 23, 2019 (WDID #2 CW425328) was submitted with NTP Request Package #1.
Standard Encroachment Permit (discretionary or ministerial)	California Department of Transportation (Caltrans)	For use of the California state highways for other than normal transportation purposes, including construction activities completed within the right-of-way.	A standard encroachment permit may be obtained for reconductoring work across State Route 84.	<b>Condition of Approval #5</b> Caltrans encroachment permit #04-19-6-UF-3374 was submitted with NTP Request Package #1. A notification shall be sent to Caltrans a minimum of 7 days prior to the start of covered work, as described in the permit.
National Pollution Discharge Elimination System Storm Water Permit (ministerial)	State Water Resources Control Board (SWRCB)	Construction activities disturbing 1 acre or more of soil must submit a Notice of Intent to comply with the terms of the general permit.	The project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP).	Complete A completed SWPPP was submitted with NTP Request Package #2.
<b>Local</b>				
Encroachment Permit (ministerial)	City of East Palo Alto	For construction activities completed within city road rights-of-way.	Guard structures would be used when reconductoring across roads.	Not applicable No guard structures would be used under the activities requested under NTP #1.
Revocable License Agreement (discretionary or ministerial)	San Francisco Public Utilities Commission (SFPUC)	Use of SFPUC lands outside of easements.	The project may secure a revocable license agreement for use of SFPUC lands outside of easements.	Not applicable No work on SFPUC land outside of easements, including at Staging Area 3, is proposed under NTP 1.

Source: (CPUC, 2018)

**Table C-2 Requirements Before Construction**

Requirement	Requirement Source	PG&E Requirement Summary <sup>a</sup>	Timing <sup>b</sup>	CPUC Verification and Monitoring Methods	Status
<b>Permits and Approvals</b>					
Applicable Permits and Approvals	Refer to Table C-1	PG&E shall ensure all necessary permits and approvals are obtained prior to construction activities. PG&E shall provide the CPUC with adequate documentation and explanation on why any permits specified in Table C-1 are not required. Permits obtained for the project shall be submitted to the CPUC including any important correspondence with jurisdictional agencies regarding project permits.	At least 30 days prior to associated permit trigger activities or otherwise agreed to by the CPUC.	Refer to Table C-1	Refer to Table C-1
<b>Worker Training</b>					

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN**

Requirement	Requirement Source	PG&E Requirement Summary <sup>a</sup>	Timing <sup>b</sup>	CPUC Verification and Monitoring Methods	Status
Biologist Qualification Approvals	MM BIO-1	Submit resumes for biologists proposed to provide WEAP training to the CPUC for approval.	At least 14 days prior to the start of construction.	Review documentation	Complete A proposed biologist (Chris Pattison) resume was submitted and approved with NTP Request Package #1.
Worker Environmental Awareness Program (WEAP)	APM AIR-2 MM BIO-1 MM BIO-2 APM CUL-1 APM HAZ-1 APM HAZ-2	Prepare a WEAP with the contents specified and submit to the CPUC for review.	At least 30 days prior to the start of construction.	NTP process	<b>Condition of Approval #6</b> A WEAP training presentation was submitted with NTP Request Package #2. A brochure for the WEAP training shall be submitted for CPUC review prior to the start of construction.
<b>Plans</b>					
Dewatering Plan	401 Permit	If dewatering will be necessary in Waters of the State, submit a Dewatering Plan to the RWQCB.	At least 14 days prior to dewatering in Waters of the State.	NTP process	<b>Condition of Approval #7</b> If a dewatering plan is determined to be necessary, it shall be submitted to the RWQCB at least 14 days prior to any dewatering in Waters of the State.
Geological Design Measures	APM GEO-1	Submit completed design studies, onsite investigations, and completed design measures for foundation improvement design work to the CPUC for review.	At least 30 days prior to the start of construction.	NTP process	Complete A set of recommended foundation design drawings endorsed by a registered professional civil engineer to address potentially problematic geological conditions was submitted with NTP Request Package #1.
Site Management Plan for the 1990 Bay Road Site	APM HAZ-3	Submit the SMP for 1990 Bay Road Site to the CPUC for review.	At least 30 days prior to the start of construction.	NTP process	Complete The SMP for the 1990 Bay Road Site was submitted with NTP Request Package #1.
Hazardous Substance Control and Emergency Procedures	MM HAZ-1	Submit Hazardous Substance Control and Emergency Procedures with the contents specified to the CPUC for review.	At least 30 days prior to the start of construction.	NTP process	Complete Hazardous Substance Control and Emergency Procedures for the project were submitted with NTP Request Package #2.
Stormwater Pollution Prevention Plan (SWPPP)	APM HYD-1 NPDES Construction General Permit	Prepare a SWPPP and submit to the CPUC for review.	At least 30 days prior to the start of construction.	NTP process	Complete A completed SWPPP was submitted with NTP Request Package #2.
Transportation Management Plan	MM TRA-1	Prepare and submit a Caltrans-approved Transportation Management Plan to the CPUC.	At least 30 days prior to the start of construction.	NTP process	<b>Not applicable</b> No lane closures or work on state highways is proposed under NTP #1.

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN**

Requirement	Requirement Source	PG&E Requirement Summary <sup>a</sup>	Timing <sup>b</sup>	CPUC Verification and Monitoring Methods	Status
<b>Notifications</b>					
EcoAtlas data input	401 Permit	Input project information into EcoAtlas.	Within 14 days of the issuance of the 401 permit.	NTP process	Complete Documentation of email correspondence with the RWQCB confirming input of project information into EcoAtlas was submitted with NTP Request Package #1. The Project ID numbers are 9893 and 9894.
RWQCB project change notification	401 Permit	If any material change or change in the change in the ownership, character, location, or quantity of waste discharge is required, report the proposed change to the RWQCB.	At least 30 days in advance of the proposed implementation of any change.	Review documentation	Not applicable No changes to waste discharge are proposed under NTP #1.
Public dust complaint signage	APM AIR-1	Dust complaint signs are posted adequately per description.	Prior to the start of construction.	Review documentation & field inspections	<b>Condition of Approval #8</b>
Conservation landowner notice	MM BIO-1	Provide notice to conservation landowners prior to conducting activities covered in PG&E's Operations and Maintenance Habitat Conservation Plan.	At least 2 business days prior to construction on protected lands.	NTP process	Complete Copies of formal preconstruction notifications submitted conservation landowners in July 2021 were provided to the CPUC with NTP Request Package #1.
Public helicopter notice	MM NO-1	Notify residences and business owners affected by daytime helicopter activities within 1,500 feet of Staging (Landing) Areas 3 and 4 and flight paths. See measure for notice contents.	At least 7 days prior to conducting helicopter activities.	Review documentation	<b>Condition of Approval #8</b>
Public noise notice	MM NO-1	Post notices in public areas, including recreational use areas, within 500 feet of the project alignment and construction work areas. See measure for notice contents.	Prior to the start of construction.	Review documentation & field inspections	<b>Condition of Approval #8</b>
Nighttime construction notice	MM NO-1	Notify residents and business owners within 1,500 feet of active nighttime reconductoring sites and staging areas. See measure for notice contents.	At least 7 days prior to conducting nighttime work.	Review documentation	<b>Condition of Approval #8</b>
Park management coordination	APM REC-1	Coordinate with park management regarding park and trail disruptions.	Prior to trail access impacts.	NTP process	Complete Copies of formal preconstruction notifications submitted to the Association of Bay Area Governments, the Midpeninsula Regional Open Space District, cities of Palo Alto and East Palo Alto, and the USFWS in July 2021 were provided to the CPUC with NTP Request Packages #1 and #2.
Public trail signage	APM REC-1	Post signage advising recreational facility users of construction activities.	Prior to trail access impacts.	Review documentation	<b>Condition of Approval #8</b>
Public transit notification	MM TRA-1	Provide advance public notification if transit routes require temporary rerouting. Public notification will include lane closure schedule, location, and duration of public transit reroute.	Prior to rerouting of transit routes.	Review documentation	Not applicable No rerouting of transit routes is proposed under NTP #1.

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN**

Requirement	Requirement Source	PG&E Requirement Summary <sup>a</sup>	Timing <sup>b</sup>	CPUC Verification and Monitoring Methods	Status
Emergency service provider coordination	MM TRA-1	Consult with local emergency service providers regarding the location, time and duration of lane closures, and submit verification of consultation to the CPUC.	Prior to implementing lane closures and detours.	Review documentation	Not applicable No lane closures or work on state highways is proposed under NTP #1.
FAA coordination	MM TRA-2	PG&E shall contact the local FAA office to determine if a Congested Area Plan is needed, and shall comply with all applicable FAA regulations.	Prior to conducting helicopter activities.	NTP process	Not applicable No helicopter activities are proposed under NTP #1.
Local airport coordination	MM TRA-2	PG&E shall coordinate all project helicopter operations with local airports including the issuance of a notice to airmen (NOTAM).	Prior to conducting helicopter activities.	NTP process	Not applicable No helicopter activities are proposed under NTP #1.
<b>Documentation and Reporting</b>					
RWQCB Mitigation Receipt	401 Permit	Submit Mitigation Receipt to the RWQCB.	No later than 60 days prior to the commencement of Project construction activities.	NTP process	Complete Documentation of the mitigation receipt and transmittal to RWQCB was submitted as part of NTP Request Package #1.
RWQCB Commencement of Construction Report	401 Permit	Submit a Commencement of Construction Report to the RWQCB.	At least 48 hours prior to initiating in-water work and any stream diversions.	Review documentation	Not applicable No in-water work or diversions are proposed under NTP #1.
Pre-project photo documentation	401 Permit	Establish a minimum of 12 photo-documentation points and prepare a site map with photo-documentation points clearly marked. Photographically document pre-project conditions.	Prior to the start of construction.	NTP process	Complete Photos showing pre-project conditions and a site map with photo-documentation points clearly marked were submitted with NTP Request Package #2
SWRCB permit registration	APM HYD-1	Develop and submit SWRCB permit registration documents to the CA SMARTS database and obtain a Waste Discharge Identification number.	Prior to the start of construction.	NTP process	Complete A completed SWPPP containing a Waste Discharge Identification number was submitted with NTP Request Package #2.
Bay Trail documentation	MM TRA-1	Document preconstruction conditions of the Bay Trail within the project area. Restore any project-related damage following construction.	Prior to the start of construction.	NTP process & review documentation	Complete Photos showing preconstruction conditions of the Bay Trail within the project area were submitted with NTP Request Package #2.
<b>Avoidance and Minimization</b>					
Vegetation impact minimization	APM BIO-2 APM BIO-5	Qualified biologist to flag access routes for crews and direct location of vegetation protection mats and determine if hand-removal of vegetation and onsite biological monitoring are required.	Prior to activities on or adjacent to nonpaved surfaces.	Review documentation & field inspections	<b>Condition of Approval #9</b>

**MITIGATION MONITORING, COMPLIANCE, AND REPORTING PLAN**

Requirement	Requirement Source	PG&E Requirement Summary <sup>a</sup>	Timing <sup>b</sup>	CPUC Verification and Monitoring Methods	Status
Aqueduct exclusion fencing	APM CUL-1	Install exclusion fencing along the southern edge of Staging Area 3 between the work area and the Hetch Hetchy Aqueduct.	Prior to work along the southern edge of Staging Area 3 between the work area and the Hetch Hetchy Aqueduct.	Review documentation & field inspections	Not applicable This staging area is no longer proposed to be used.
Flag weed populations	MM BIO-2	Flag known populations of noxious weeds and invasive plants in the work areas.	Prior to site access.	Review documentation & field inspections	<b>Condition of Approval #9</b>

Notes:

<sup>a</sup> The requirement summaries provided in this table are based on APMs and MMs provided in Appendix B or from permits identified in Table C-1. Important details may not be included in the summaries. Refer to the requirement sources for a complete description of the requirements.

<sup>b</sup> Submittal and review timeframes are not specified in all of the requirement sources. Where necessary, submittal and review timeframes have been added to ensure there is sufficient time to review certain documentation and address any comments from the CPUC.