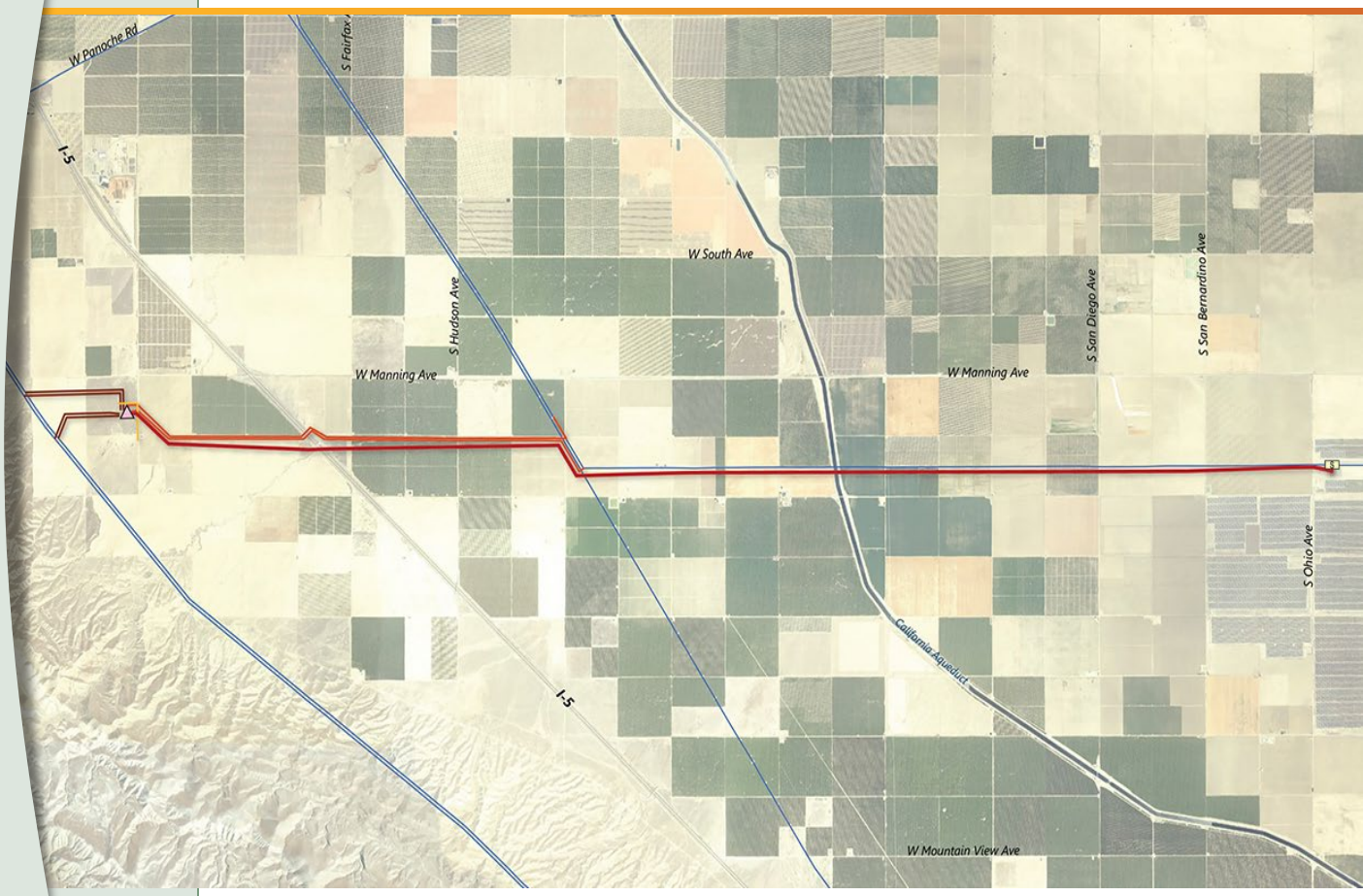

Detailed Mitigation Monitoring, Compliance, and Reporting Program

LS Power Grid California Manning 500/230 Kilovolt Substation Project

Prepared for:

California Public Utilities Commission

January 2026

Detailed Mitigation Monitoring, Compliance, and Reporting Program

Manning 500/230 kV Substation Project

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LIST OF ABBREVIATIONS

AC	alternating current
APM	applicant-proposed measure
CAISO	California Independent System Operator
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFPP	Construction Fire Prevention Plan
CM	construction measure
CPCN	certificate of public convenience and necessity
CPUC	California Public Utilities Commission
CRS	cultural resources specialist
ESA	environmentally sensitive area
FAA	Federal Aviation Administration
FESA	Federal Endangered Species Act
IS/MND	Initial Study/Mitigated Negative Declaration
ITP	Incidental Take Permit
kV	kilovolt
LSPGC	LS Power Grid California, LLC
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
mph	miles per hour
MPR	minor project refinement
NACE	National Association of Corrosion Engineers
NAHC	Native American Heritage Commission
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
O&M	operation and maintenance
PFM	petition for modification
PG&E	Pacific Gas and Electric Company
PRC	Public Resources Code
PTC	permit to construct
ROW	right-of-way
SJVAPCD	San Joaquin Valley Air Pollution Control District
the project	Manning 500/230-kV Substation Project
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
WEAP	Worker's Environmental Awareness Program

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1 INTRODUCTION

The California Public Utilities Commission (CPUC) approved a certificate of public convenience and necessity (CPCN) for the Manning 500/230-kV Substation Project (referred to herein as "the project") on September 18, 2025. As part of this action, the CPUC adopted the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the project, including the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) presented as Appendix 2 of the Final IS/MND, which includes procedures for preparing and implementing the mitigation measures identified in the Final IS/MND. This document, referred to as the Detailed MMCRP, supplements the adopted MMCRP in the Final IS/MND and serves as a working guide to maintain environmental compliance for the project and includes specific protocols, guidelines, and standard procedures for environmental compliance to be followed prior to and during project construction.

1.1 PROJECT OVERVIEW

The Manning 500/230 kV Substation Project will address reliability and capacity issues identified by the California Independent System Operator (CAISO) on the existing Pacific Gas and Electric (PG&E) system in the Fresno area, as well as allow advancement of renewable energy generation in the San Joaquin area.

The project entails construction and operation of the new Manning Substation, which will be located on 40 acres that LS Power Grid California (LSPGC) owns. In addition, the project includes one new overhead double-circuit 230 kilovolt (kV) transmission line that will extend approximately 12 miles from the new LSPGC Manning Substation to interconnect with PG&E's existing Tranquillity Switching Station. The project will also interconnect PG&E's existing Los Banos-Midway #2 500 kV transmission line, Los Banos-Gates #1 500 kV transmission line, and Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission lines to the new LSPGC Manning Substation. Approximately 7 miles of PG&E's existing Panoche-Tranquillity Switching Station #1 and #2 230 kV transmission lines will be reconductored as part of the project. An existing underground fiber cable adjacent to PG&E's existing Tranquillity Switching Station will be extended to the optical ground wire of the new 230 kV transmission line.

To provide sufficient ground clearance for the new 230 kV transmission line and 230 kV interconnections, existing transmission line support structures will be constructed along PG&E's existing Gates-Panoche #1 and #2 230 kV transmission lines and Panoche-Excelsior #1 and #2 115 kV transmission lines. The existing transmission lines surrounding PG&E's existing Panoche Substation will be rerouted into a new breaker-and-a-half configuration inside the Panoche Substation. The project also includes installation of new transmission structures along PG&E's existing Los Banos-Midway #2 500 kV and Los Banos-Gates #1 transmission lines, as well as modifications to PG&E's existing Tranquillity and Las Aguilas Switching Stations and PG&E's existing Panoche, Los Banos, Gates, and Midway Substations to accommodate the interconnections. Additionally, modifications will occur at the Panoche Energy Center, a third-party energy generation facility located adjacent to PG&E's existing Panoche Substation, to accommodate the reroute of the Panoche-Panoche Energy Center 230 kV transmission line. An existing PG&E distribution line will be extended to provide temporary power to the LSPGC Manning Substation during construction and backup power during operations and maintenance.

1.2 MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

1.2.1 Authority

Pursuant to Public Resources Code section 21002.1(b), one of the CPUC's functions as Lead Agency is to mitigate and/or avoid the significant effects on the environment of projects it approves. This includes ensuring the mitigation measures it adopts are effective and enforceable and are being implemented. Under California Environmental Quality

Act (CEQA) Guidelines Section 15097, the CPUC as Lead Agency is responsible for ensuring that implementation of the mitigation measures, LSPGC applicant proposed measures (APMs), and PG&E construction measures (CMs) occurs in accordance with the MMCRP that the CPUC adopted in its Final Decision on September 18, 2025. To fulfill its obligations, the CPUC is responsible for interpreting the mitigation measures, APMs, and CMs to ensure that they are being implemented effectively.

The CPUC may conduct a comprehensive review to determine whether there are 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 3.1.5. If the CPUC determines that, based on the review, any conditions are not adequately mitigating significant environmental impacts caused by the project, the CPUC may specify appropriate means and methods to ensure that the mitigation is being effectively implemented. These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

The CPUC has additional authority under the Public Utilities Code. Consistent with the CPUC's rules and practices, including Public Utilities Code section 768, the CPUC may require the performance of any other act that the health or safety of its employees, passengers, customers, or the public may demand. Pursuant to Public Utilities Code sections 314 and 582, the CPUC may require documentation or copies of permits issued by other agencies.

1.2.2 Purpose

This Detailed MMCRP includes provisions for monitoring and reporting. Monitoring refers to the ongoing or periodic process by which project construction and operation are overseen by the Lead Agency; in the case of the project, monitoring will ensure that LSPGC and PG&E's compliance with project conditions is checked on a regular basis. Reporting, which comprises written reviews of LSPGC's compliance with APMs and mitigation measures and PG&E's compliance with CMs presented to the decision-making body or a designated staff person, ensures that the Lead Agency is informed of LSPGC and PG&E's compliance with CMs, APMs, and mitigation measures. The CEQA Guidelines encourage lead and responsible agencies to cooperate in mitigation monitoring and reporting, where possible.

This Detailed MMCRP was prepared consistent with the framework in Public Resources Code section 21081.6 and CEQA Guidelines section 15097. The Detailed MMCRP will be implemented until the final monitoring and reporting procedures identified in the following sections have been completed to the CPUC's satisfaction.

The purpose of the Detailed MMCRP is to:

- Ensure effective implementation of the CMs, APMs, and mitigation measures adopted by the CPUC;
- Facilitate the monitoring, compliance, and reporting activities of the CPUC and its monitors;
- Establish lines of communication related to mitigation monitoring; and
- Provide a method of effectively documenting and reporting compliance with all CMs, APMs, and mitigation measures.

Therefore, this Detailed MMCRP:

- Summarizes mitigation measures, APMs, and CMs and their monitoring and reporting requirements, as identified in the Final IS/MND;
- Describes the process by which environmental monitors designated by CPUC Energy Division (Energy Division) staff will observe construction of the project to ensure implementation of each CM, APM, and mitigation measure; and
- Describes the process for recording "non-compliance" (i.e., evidence that LSPGC or PG&E is not fully implementing each applicable CM, APM, and mitigation measure).

The Detailed MMCRP was developed to provide guidelines and standardize procedures for environmental compliance on the project. These procedures have been developed by the CPUC, in coordination with LSPGC, PG&E, and other responsible agencies, to help define reporting relationships, provide detailed information about the roles

and responsibilities of the project's environmental compliance team members, define compliance reporting procedures, and establish communication protocol. Throughout the course of project construction, the protocols, guidelines, procedures, communication lists, and schedules presented in the Detailed MMCRP may be revised as needed to address specific day-to-day realities of project construction.

1.2.3 Implementation

Implementation of the Detailed MMCRP begins during pre-construction and continues through post-construction. Detailed MMCRP implementation will cease when the CPUC concludes there is no further need for CPUC monitoring of the project. LSPGC and PG&E each must perform post-construction monitoring for the project, as applicable, and in accordance with the mitigation measures and the APM and CM requirements as described in the Final IS/MND. Post-construction monitoring and Detailed MMCRP implementation will continue until compliance with post-construction requirements (e.g., revegetation) has been met.

1.2.4 Program Scope

CEQA MITIGATION

LSPGC, as the applicant and in accordance with State CEQA Guidelines Section 15070, has agreed to the mitigation measures included in this Detailed MMCRP, which are listed in Table 6 in Section 5 of this Detailed MMCRP. LSPGC is also responsible for implementing all of the APMs for its components of the project. These APMs are listed in Table 7 in Section 5 of this Detailed MMCRP.

PG&E is not an applicant, and the PG&E components of the project were not authorized under the CPUC decision that adopted the Final IS/MND and granted LSPGC's permit for the project (CPUC Decision 25-09-013). However, as PG&E's components of the project were analyzed in the Final IS/MND as part of the whole of the project, PG&E separately filed a notice of construction with the CPUC as a Tier 2 advice letter pursuant to GO 131-E. The CPUC accepted PG&E Advice Letter 7706-E effective October 17, 2025. PG&E has developed and incorporated CMs into the PG&E components of the project, and these CMs are listed in Table 6 and Table 8 in Section 5 of this Detailed MMCRP.

The APMs and CMs are intended to be implemented and enforced in the same way as mitigation measures consistent with Section 15126.4 of the State CEQA Guidelines. For this reason, the CMs, APMs, and mitigation measures are collectively referred to as "CEQA mitigation." To the extent CEQA mitigation expressly relies on, includes, or references permits or approvals from other federal, state, and local agencies, all terms and conditions of such permits or approvals are considered incorporated into the scope of the CEQA mitigation.

OTHER PERMITS AND AUTHORIZATIONS

Potentially applicable permits for the project were addressed in the "Project Description" section of the IS/MND and are listed in Table 1, below. Table 2 lists contact information for permitting agencies associated with the project.

Table 1 Potential Consultation and Permitting Requirements

Agency/Group	Jurisdiction	Consultation or Permit
Federal		
United States Army Corps of Engineers (USACE)	Work with waters of the United States, including wetlands	Consultation with the USACE, Regional Water Quality Control Board, California Department of Fish and Wildlife, and USFWS for a Clean Water Act Section 404 permit. Requires Section 408 consultation.
United States Fish and Wildlife Service (USFWS)	Threatened or endangered species and conservation plans	Take authorization (if required) and consultation with the USFWS.

Agency/Group	Jurisdiction	Consultation or Permit
Federal Aviation Administration	Aircraft operation and safety in United States air space	Consultation to determine whether Congested Area Plan approval for helicopter external-load operations is required. Consultation to ensure compliance with Federal Aviation Regulations Part 77.
State		
California Public Utilities Commission	California Environmental Quality Act review and overall approval of the project	Certificate of Public Convenience and Necessity (CPCN) for LSPGC; GO 131-E Notice of Construction for PG&E
California Department of Fish and Wildlife	Threatened or endangered species and conservation plans	Take authorization (if required) and consultation with the USFWS. Consultation for Section 2081 of the California Endangered Species Act.
California Department of Fish and Wildlife	Work within regulated waters of the State	Consultation for Section 1600 of the California Fish and Game Code (streambed alteration agreement)
California Department of Transportation (Caltrans)	Crossing a Caltrans right-of-way, such as Interstate 5	Encroachment permit
California Department of Water Resources + Bureau of Reclamation	Crossing the right-of-way of the California Aqueduct	Encroachment permit
State Water Resources Control Board	Stormwater discharges during project construction	National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated With Construction And Land Disturbance Activities Order WQ 2022-0057-DWQ NPDES No. CAS000002
Regional and Local		
County of Fresno	Construction of the project on land subject to a Williamson Act contract	Williamson Act Review
County of Fresno	Grading required for construction of the project	Grading Permit/Voucher
County of Fresno	Construction of improvements to Manning Avenue and the substation access road	Road Improvement Permit
County of Fresno	Construction work within right-of-way of County roadways	Road Encroachment Permit
Fresno County Fire Protection District	Approval of access to the substation and enclosure sizes	Site Access and Water Supply Permit
Fresno County Fire Protection District	Approval of fire detection system at the substation	Fire Detection System Permit
San Joaquin Valley Air Pollution Control District	Construction, demolition, excavation, extraction, and other earth-moving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site	Rule 8021, Dust Control Plan

Table 2 Permitting Agency Contact Information

Agency	Address	Contact	Phone	Email Address
Lead Agency				
CPUC	505 Van Ness Avenue, San Francisco, CA 94102	Tommy Alexander, Project Manager	(213)-266-4748	tommy.alexander@cpuc.ca.gov
Federal Agencies				
United States Army Corps of Engineers	1325 J Street, Sacramento, California 95814	TBD	(916)-557-5100	SPLPermitInquiries@usace.army.mil
United States Fish and Wildlife Service	Federal Building, 2800 Cottage Way, Room W-2605, Sacramento, California 95825	TBD	(916)-414-6600	TBD
Federal Aviation Administration	1781 E. Fir Avenue, Suite 203, Fresno, California 93720	TBD	TBD	TBD
State Agencies				
California Department of Transportation	California Dept of Transportation District 6, 1352 W. Olive Avenue, Fresno, California 93728	TBD	(559)-488-4058	District6EncroachmentPermits@dot.ca.gov
California Department of Fish and Wildlife	1234 E. Shaw Avenue, Fresno, California 93710	TBD	(559)-243-4005	R4LSA@wildlife.ca.gov And R4CESA@wildlife.ca.gov
California Department of Water Resources + Bureau of Reclamation	Division of Engineering, Department of Water Resources, 715 P Street, #5,Sacramento, California 94236	TBD	(800) 600-4397	swp.encroachments@water.ca.gov
State Water Resources Control Board	1001 I Street, Sacramento, CA 95814	TBD	(866)-563-3107	stormwater@waterboards.ca.gov
Regional and Local				
County of Fresno	Road Maintenance and Operations Division, 2220 Tulare Street, 6th Floor, Fresno, California 93721	TBD	(559)-600-4240	encroachmentpermits@co.fresno.ca.us
Fresno County Fire Protection District	210 S. Academy, Sanger, California 93657	TBD	(559)-493-4300	N/A
San Joaquin Valley Air Pollution Control District	1990 E. Gettysburg Avenue, Fresno, California 95356	TBD	(559)-230-5950	dcp.central@valleyair.org

2 ROLES AND RESPONSIBILITIES

This section describes specific LSPGC, PG&E, and CPUC roles and responsibilities for the project. LSPGC and PG&E have the primary responsibility to ensure compliance with its aspects of the Detailed MMCRP and any other relevant local, state, or federal regulations or authorizations. LSPGC and PG&E must obtain and comply with all other required applicable permits and approvals. The CPUC is responsible for monitoring that LSPGC has adequately implemented mitigation measures and APMs and that PG&E has adequately implemented CMs. The CPUC is also responsible for monitoring and verifying that construction and operation activities are consistent with the project description in the Final IS/MND. An organizational chart is provided below as Figure 1.

2.1 LSPGC AND PG&E ROLES AND RESPONSIBILITIES

LSPGC and PG&E personnel and contractors are responsible for implementing all mitigation measures (LSPGC), APMs (LSPGC), CMs (PG&E), permit conditions, and the Detailed MMCRP. This includes all terms and conditions in permits or approvals from other federal, state, and local agencies. LSPGC and PG&E must comply with project requirements, plan construction activities in a way that meets project requirements, document compliance activities and mitigation results, and implement the Detailed MMCRP.

2.1.1 LSPGC and PG&E Project Managers

LSPGC's Project Manager and PG&E's Project Manager will provide the overall direction, management, leadership, and corporate coordination for their respective components of the project. The Project Managers will be responsible for the project construction schedule and for ensuring that the project is completed as required by project contract documents and conditions, including adopted APMs and mitigation measures (LSPGC), adopted CMs (PG&E), and agency permitting requirements.

The Project Manager's responsibilities for both LSPGC and PG&E include, but are not limited to:

- Leading coordination among engineering, construction management, and environmental staff for LSPGC and PG&E;
- Leading coordination between LSPGC and PG&E staff and regulatory agencies to ensure that all agency requirements are met;
- Leading the integration of environmental responsibilities into all levels of project construction activities;
- Ensuring compliance with project APMs and mitigation measures (LSPGC), and CMs (PG&E), as well as any other project environmental policies, guidelines, and procedures;
- Ensuring that data, including work schedule, location, and critical issue information, are provided to members of the project construction team as needed; and
- Communicating project activities, schedules, and environmental and public relations issues to the project team as needed.

2.1.2 LSPGC and PG&E Environmental Project Managers

LSPGC's Environmental Project Manager will be responsible for providing the appropriate level of resources for successful environmental compliance for the LSPGC components of the project. Likewise, the PG&E Environmental Project Manager will have the same responsibilities for the PG&E components of the project. The Environmental Project Managers will communicate with the staff at the CPUC and other applicable agencies. The Environmental Project Managers are responsible for directing development and implementation of preconstruction environmental planning, permitting, and compliance activities; the environmental inspection and preconstruction survey program;

and the Worker Environmental Awareness Training Program. The Environmental Project Managers are also responsible for ensuring compliance with requirements in project permits, APMs, CMs, and mitigation measures.

The LSPGC Environmental Project Manager is ultimately responsible for ensuring that LSPGC construction crews maintain compliance with all project permits, APMs, and mitigation measures.

The PG&E Environmental Project Manager is ultimately responsible for ensuring that PG&E construction crews maintain compliance with all project permits and CMs.

2.1.3 LSPGC and PG&E Environmental Monitoring Teams

LSPGC and PG&E's environmental monitors are the primary field staff responsible for evaluating, documenting, and verifying compliance of construction activities with all applicable requirements. The environmental monitoring team for LSPGC and/or PG&E may be led by qualified environmental consultants under the direct supervision of the Environmental Project Managers. Each environmental monitor will work closely with construction personnel to ensure that preconstruction surveys are completed and APMs, CMs, and mitigation measures are effectively implemented. Specialty Monitors will be assigned by LSPGC and/or PG&E as needed and as required to protect sensitive biological, paleontological, and archaeological resources. In addition to ensuring compliance during construction, LSPGC and PG&E are required to provide updates to the CPUC.

2.1.4 LSPGC and PG&E Construction Supervisors

LSPGC and PG&E will each identify a construction supervisor prior to the start of construction of their respective components of the project. The construction supervisor may be different for different project scope components. The construction supervisor for each will review the daily construction work schedules at the morning tailboard with on-site construction personnel and monitors and will describe the nature and extent of scheduled construction activities to ensure that adequate monitoring resources are provided. The construction supervisor for each will also ensure that construction schedules are provided to their respective Environmental Project Managers. Each Environmental Project Manager will provide the construction schedule to the CPUC with their required report for the previous quarter. For example, the CPUC will be provided with the quarter 3 schedule in the quarterly report submitted for quarter 2.

2.2 CPUC ROLES AND RESPONSIBILITIES

2.2.1 CPUC Project Manager

The CPUC Project Manager has overall responsibility for determining the effectiveness of compliance with environmental requirements based on the success criteria included for each APM, CM, and mitigation measure. The CPUC Project Manager assigns monitoring and reporting responsibilities to a third-party contractor (Ascent), as described below, and will oversee the work of the third-party contractor through review of monthly status reports. The CPUC Project Manager will be notified of non-compliance situations and may be involved in the resolution of the issue(s). All requests for project changes and Notices to Proceed (NTPs) will be submitted to the CPUC Project Manager for review and approval. The CPUC Project Manager will issue NTPs for construction of each phase of the project, as identified by LSPGC. Construction of the PG&E components of the project will be undertaken in accordance with PG&E Advice Letter 7706-E, accepted by the CPUC effective October 17, 2025. The CPUC has the authority to halt any construction activity associated with the project if the activity is determined to be a serious deviation from the approved project or adopted APMs, CMs, or mitigation measures. A construction halt or stop work order would follow the communication procedure outlined in Section 3.5.4.

2.2.2 CPUC Environmental Monitors

The CPUC's third-party contractor, Ascent, will report to the CPUC Project Manager and will conduct monitoring and reporting duties as needed. The Ascent Monitoring team will be led by the Compliance Director and Compliance Manager. LSPGC and PG&E have the primary responsibility for ensuring compliance with CEQA mitigation, including mitigation measures (LSPGC), APMs (LSPGC), and CMs (PG&E). The CPUC Environmental Monitors ensure and document compliance achievement. Compliance is documented through site inspection forms, mitigation measure, APM, and CM tracking, and weekly and monthly reports to the CPUC Project Manager. The following Environmental Monitors will be involved in the project:

- The CPUC (Ascent) Compliance Director supports the CPUC Compliance Manager and CPUC Compliance Monitors and will provide senior-level advice as needed to the CPUC Project Manager and the CPUC Compliance Manager.
- The CPUC (Ascent) Compliance Manager will oversee day-to-day monitoring activities of the Compliance Monitors and will be the designated point of contact for in-field agency staff regarding compliance, minor deviations, and minor project changes. The CPUC Compliance Manager will work with the CPUC Project Manager, CPUC (Ascent) Compliance Director, and CPUC (Ascent) Compliance Monitors, LSPGC, and PG&E to determine the appropriate level of inspection frequency, and will also oversee Compliance Monitors. The CPUC Compliance Manager coordinates with CPUC Compliance Monitors to prepare monitoring reports for the CPUC. The CPUC Compliance Manager will also have the most direct communication with the CPUC regarding monitoring and will serve as the point of contact for noncompliance events. The CPUC Compliance Manager will stay apprised of construction activities, schedule changes, and construction progress.
- The CPUC (Ascent) Compliance Monitors will record compliance issues, notify appropriate project members of compliance issues, report any problems to the CPUC Compliance Manager and/or CPUC Project Manager, and assist with other environmental monitoring activities (e.g., review of plans and reports submitted by LSPGC and PG&E and tracking compliance activities). Compliance Monitors consist of staff from Ascent. The number of Compliance Monitors and frequency of site inspections will depend on the number of concurrent construction activities and their locations.

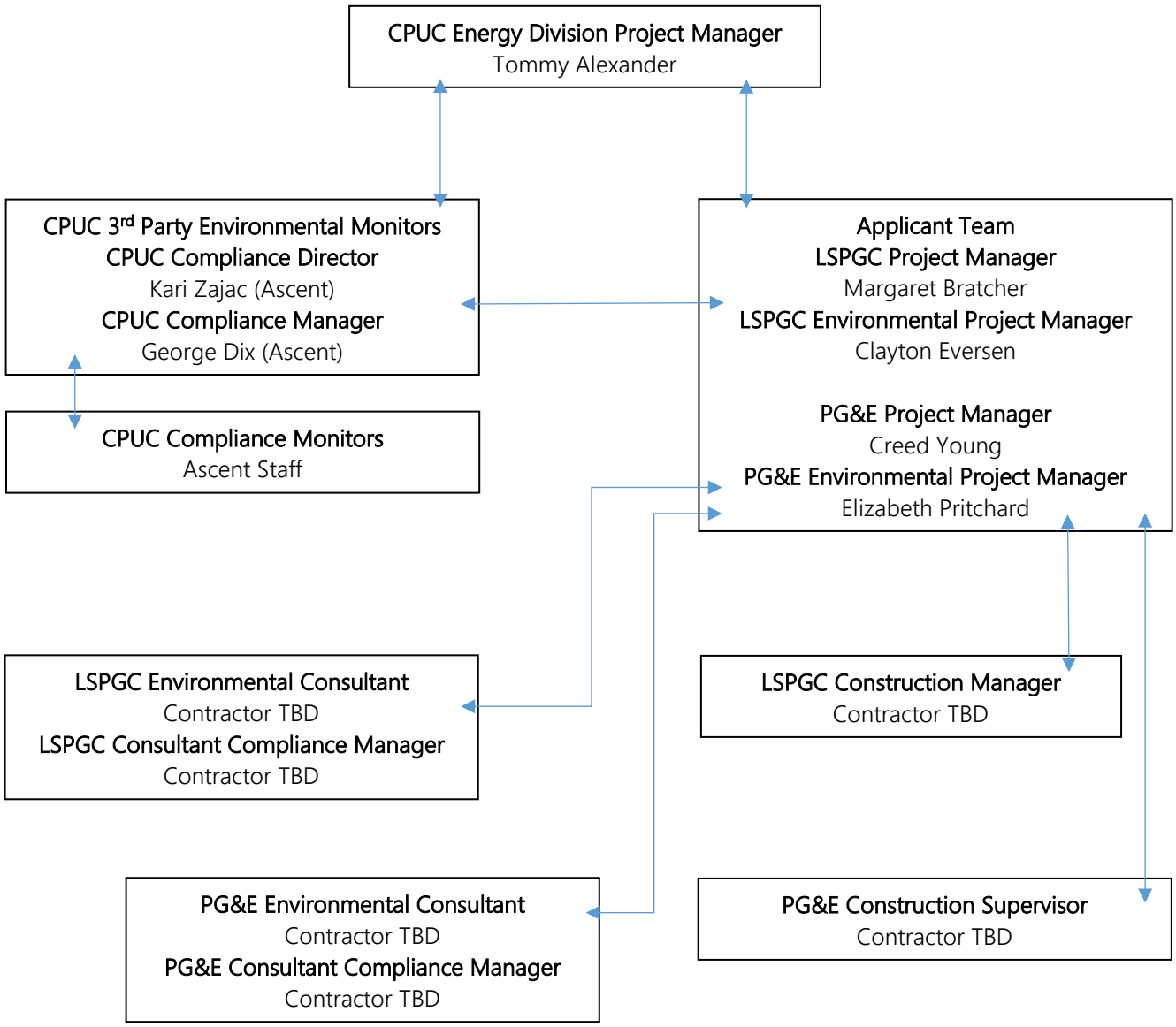
2.3 ORGANIZATION CHART

Figure 2-1 is an organization chart of the CPUC, LSPGC, and PG&E personnel that illustrates lines of communication among these personnel. The CPUC, LSPGC, and PG&E are responsible for informing others about changes in staff. Contact information is provided in Attachment A.

2.4 PERMITTING AGENCIES ROLE

Personnel from permitting agencies identified in Section 1.2 may periodically visit the project site to verify compliance with, or request information from either LSPGC or PG&E regarding compliance with, laws, regulations, and project permits. LSPGC and PG&E are responsible for responding to requests from permitting agencies and submitting the permits and authorizations to the CPUC according to project requirements. See Section 4 for document submission procedures.

The CPUC may contact permitting agencies at any time regarding the project and to clarify agency requirements, permit conditions, or approvals related to the agency's jurisdiction. The CPUC may also ask that LSPGC and/or PG&E obtain input from the permitting agency or that LSPGC and PG&E participate in discussion with the CPUC. The CPUC retains the authority to coordinate directly with other agencies regarding the project and all permit conditions or plan review comments.



Note: Figure 1 depicts the primary communication pathways only and does not preclude communication among various CPUC or project proponent field staff.

Figure 1 Organizational Chart

3 PROCEDURES

This section contains Detailed MMCRP procedures for the personnel roles identified in Section 2. These procedures will be implemented prior to, during, and after construction to facilitate project requirement implementation.

3.1 COMMUNICATION PROTOCOL

Communication is a critical component of a successful environmental compliance program. To avoid project delays and possible work stoppages, the CPUC, LSPGC environmental, PG&E environmental, and construction representatives will interact regularly; maintain professional, responsive communications at all times; and coordinate closely to address and resolve issues in a timely manner. This section presents a communication protocol to accurately and efficiently disseminate information regarding ongoing surveys, APMs, mitigation measures, CMs, construction activities, construction contractor oversight, and planned or upcoming work prior to the commencement of construction. These communication protocols may be refined and revised for future versions of this Detailed MMCRP as needed, to address the specific day-to-day realities of project construction.

3.1.1 Pre-Construction Coordination

LSPGC is required by the terms of the APMs and mitigation measures, and PG&E required by the terms of the CMs, and both by the permitting requirements of various other regulating agencies, to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. During this pre-construction process, both LSPGC and PG&E will conduct meetings, conference calls, and site visits with technical representatives of the CPUC and other agencies, and the LSPGC and/or PG&E environmental representatives as appropriate. The purpose of the pre-construction coordination process is to discuss document submittal status, document the findings of data reviews and permitting agency approvals, review LSPGC and PG&E submittals, and document the status of APMs, CMs, and mitigation measures as they apply to the project or phased project segment (see Section 4 for document submittal procedures). The goal of the pre-construction process is to complete all required actions so the CPUC can issue NTP authorizations to LSPGC. PG&E is not an applicant in the A.24-06-017 proceeding and therefore is not subject to the NTP process; instead PG&E filed a notice of construction pursuant to General Order 131-E on September 24, 2025 (Advice Letter 7706-E), and the CPUC accepted PG&E's advice letter in a disposition letter issued October 17, 2025.

3.1.2 Communication Protocol During Construction

This section outlines daily, weekly, and monthly communication protocols and processes.

DAILY COMMUNICATION DURING CONSTRUCTION

Regular communication among CPUC Compliance Monitors, LSPGC, PG&E, and construction staff can address many issues that arise during construction. All field staff will be equipped with cell phones or two-way radios (or immediate access to a cell phone or radio) and should be available to receive calls at all times during construction. Offsite staff will be available during normal business hours via email or phone. If field-based staff change regularly (e.g., if lead monitors are on duty only one or two days per week), the use of a single point of contact is highly recommended (e.g., a single cell phone could be assigned to whichever lead monitor is on duty each day, or other suitable solutions to facilitate efficient communication) to facilitate communication continuity. Changes to key staff will be reported to the CPUC Project Manager and Compliance Manager as soon as possible, and the project contact list in Attachment A will be updated accordingly.

CPUC Compliance Monitors

If consultants are providing monitoring in the field during a CPUC Compliance Monitor site visit, the Environmental Consultants will be the CPUC Compliance Monitor's primary points of contact. If no monitoring is occurring in the field at the time of a CPUC Compliance Monitor site visit, the CPUC Compliance Monitor's primary points of contact are LSPGC's Environmental Project Manager and PG&E's Environmental Project Manager. The CPUC Compliance Monitors will contact an Environmental Project Manager if an LSPGC or PG&E activity is observed that conflicts with one or more of the APMs, mitigation measures, CMs, or project plans. The CPUC Compliance Monitor will also contact the respective Environmental Project Manager regarding construction crew work locations; status of mitigation measures, APMs, CMs, and project plans; and the overall construction schedule. Much of this information can be obtained through participation in tailboard meetings prior to the start of construction each day. The CPUC Compliance Monitor may discuss construction procedures directly with the construction supervisor, but such discussions should be limited to basic questions pertaining to clarification of daily project activities and mitigation measure compliance. All other questions between contractors and CPUC Compliance Monitors, especially those concerning construction means and methods, should be directed to LSPGC and PG&E's Environmental Project Managers. The CPUC Compliance Monitor will not provide work direction to the contractor or LSPGC or PG&E's environmental monitors, and will avoid directing questions to the construction crews.

PROGRESS MEETINGS AND COMMUNICATION DURING CONSTRUCTION

Conference calls may be held on a regular basis (i.e., biweekly, monthly, or twice-monthly), or on an as-needed basis throughout construction. Separate meetings will be held with LSPGC and PG&E, unless the CPUC Project Manager determines it is beneficial for both LSPGC and PG&E to be in attendance together. The need for conference calls, whether regular or as needed, should be determined in the early stages of construction. Participants should generally include the CPUC Project Manager, Compliance Director, and Compliance Manager, the CPUC Compliance Monitors, the respective Environmental Project Manager from either LSPGC or PG&E, and representatives from either LSPGC or PG&E who are knowledgeable about project engineering and schedule. Specialty monitors, technical experts, and/or construction contractors will be invited as needed. Call timing and participants may vary according to the topics discussed. Topics discussed on status update conference calls will include overall project schedule, construction schedules, pertinent environmental compliance issues, any anticipated minor project changes, and any relevant compliance patterns and trends.

LSPGC and PG&E shall provide the CPUC with written quarterly reports of the project, which shall include progress of construction, resulting impacts, mitigation implemented, tentative construction schedule for the next quarter, and all other noteworthy elements of the project. The first report shall be submitted before the end of the first quarter in which construction begins. Quarterly reports shall be required from LSPGC for as long as APMs and mitigation measures are applicable. PG&E reports shall be for the portions of the project for which PG&E has committed to implement CMs, for as long as the CMs are applicable. The CPUC Compliance Manager will review the reports to ensure that the status of APMs and mitigation measures (LSPGC) and CMs (PG&E) is consistent with observations in the field. The report will also be a tool to keep all parties informed of construction progress and compliance trends. Topics that should be covered in the report include:

- Construction status update for all active work phases and a look-ahead work description and schedule for subsequent work within each active package.
- Compliance summary detailing compliance activities such as notable survey efforts, non-compliance incidents and their resolutions, preparation for implementation of CEQA mitigation for future work phases, recently submitted or processed project changes, a list of outstanding agency deliverables, and representative monitoring photographs. Both LSPGC and PG&E are required to keep accurate and detailed accounts of non-compliance incidents (and subsequent resolutions) as identified by the CPUC as well as self-reported.

3.1.3 Questions and Clarifications

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. LSPGC, PG&E, and the CPUC shall submit important questions and clarifications in writing via email (e.g., full compliance with mitigation measures, procedures, and project changes). Email correspondence and compliance and monitoring reports should be used to document resolutions.

3.1.4 Construction Schedule

Both LSPGC and PG&E shall keep the CPUC team informed of delays in their respective construction schedule. In particular, LSPGC and PG&E shall inform the CPUC of any schedule changes that may affect implementation of the Detailed MMCRP.

3.1.5 Dispute Resolution

The following procedure will be observed for dispute resolution:

- Step 1. Disputes and complaints (including those of the public) should be directed first to the CPUC Project Manager or Construction Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute. If the dispute can be resolved by LSPGC or PG&E, then the CPUC Project Manager will direct the party in question to either LSPGC or PG&E.
- Step 2. Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the project or adopted APMs, CMs, and mitigation measures.
- Step 3. If a dispute or complaint regarding the implementation or evaluation of APMs, CMs, or mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC Project Manager, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC Executive Director or his/her designee. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served to other affected participants. Within 10 days of receipt, the Executive Director or designee(s) will meet or confer with the filer and other affected participants for the purposes of resolving the dispute. The Executive Director may issue an Executive Resolution describing his/her decision and serve it to 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 CPUC via a procedure to be specified by the CPUC.

Parties may also seek review by the CPUC 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.

3.2 PRE-CONSTRUCTION COMPLIANCE VERIFICATION OF CEQA MITIGATION

Table 3 outlines the plans, reports, and other documentation required for pre-construction compliance verification. The CPUC will verify compliance with pre-construction APMs, CMs, and mitigation measures prior to construction. If required by the CEQA mitigation, LSPGC and PG&E, as applicable, must obtain approval of all necessary resource-specific plans, verify that permitting requirements of other agencies have been met, and perform all required surveys and studies before construction begins. The purpose of the pre-construction process is to complete all required actions so that the CPUC can issue NTPs for the LSPGC components of the project and document PG&E's compliance with the measures applicable to the transmission line work covered by the PG&E Advice Letter 7706-E and the CPUC's subsequent disposition letter.

The CPUC Compliance Manager and technical experts will review plans and reports submitted by LSPGC and PG&E and will provide comments and request revisions, if necessary. Other agencies may also review plans and reports prior to or concurrent with the CPUC, if required by APMs, CMs, and mitigation measures or permits, and provide comments. LSPGC and PG&E will provide the CPUC with the other agencies' comments on these documents to ensure that the plans and reports adequately achieve the goals, performance standards, and any other requirements of the mitigation measure(s), CM(s), or APM(s). The CPUC will only issue an NTP for the LSPGC components of the project if it is satisfied that resource-specific plans and reports comply with the goals, performance standards, and any other requirements of the applicable mitigation measure(s) or APM(s).

The CPUC may authorize LSPGC to begin construction on a phased basis, and Ascent will handle pre-construction compliance review accordingly. In the event that construction authorization is issued to LSPGC in phases, NTPs will be issued for each phase, as soon as pre-construction compliance is satisfactorily accomplished for that phase. As discussed previously, PG&E is not subject to the NTP process, but would nonetheless provide the CPUC with documentation of compliance with the CMs prior to construction for the CPUC's verification and concurrence.

Table 3 Manning 500/230 kV Substation Project: Plans, Reports, and Other Documentation Required for Pre-Construction Compliance Verification

Item/Documentation	MM, APM, or CM	LSPGC or PG&E Requirement, or Both	Responsible Action Agency
Documentation Landowners Notified of Construction and Restoration Activities	APM-AES1; CM AG-1	Both	CPUC
Construction Equipment Memorandum	MM AQ-1; CM AQ-A	Both	CPUC
Historical and archaeological resources survey results for all areas not previously surveyed	MM CR-3; CM CR-C	Both	CPUC
Induction Study	APM UTIL-1	LSPGC	CPUC
Helicopter Use and Safety Plan	APM HAZ-1	LSPGC	CPUC; FAA
Congested Area Plan	APM HAZ-1	LSPGC	CPUC; FAA
Stormwater Pollution Prevention Plan – will include dewatering plan	Regulatory Requirement	Both	CPUC; SWRCB
Traffic Control Plan – in coordination with Fresno County and Caltrans	CM TRA-1	PG&E	CPUC; Caltrans; County of Fresno
Hazardous Materials Management Plan – in accordance with Title 24, Part 9	Regulatory Requirement	Both	CPUC
Fugitive Dust Control Plan - in coordination with SJVAPCD, Rule 8120	APM AIR-2	LSPGC	CPUC; SJVAPCD
Restoration Plan	APM BIO-2	LSPGC	CPUC
Workers Environmental Awareness Program (biological and cultural resources)	APM BIO-3; APM CUL-1; CM BIO-1; CM CUL-1	Both	CPUC
Worker Environmental Awareness Training (hazardous materials)	CM HAZ-2	PG&E	CPUC
Construction Fire Prevention Plan	APM FIRE-1	LSPGC	CPUC
Avian Protection Plan	MM BIO-11; CM BIO-L	LSPGC	CPUC; CDFW; USFWS
Report/evidence of biological field surveys for portions of the alignment not surveyed	APM BIO-1; CM GNE-1	Both	CPUC
Special-Status Plants Survey Results	MM BIO-1; CM BIO-A	Both	CPUC
Blunt-noised leopard lizard survey results	MM BIO-2; CM BIO-B	Both	CPUC
Special-status reptiles survey results	MM BIO-3; CM BIO-C	Both	CPUC

Item/Documentation	MM, APM, or CM	LSPGC or PG&E Requirement, or Both	Responsible Action Agency
Western spadefoot toad survey results	MM BIO-4; CM BIO-D	Both	CPUC
Special-status and other nesting birds survey results	MM BIO-5; CM BIO-E	Both	CPUC
Burrowing owl survey results	MM BIO-6; CM BIO-F	Both	CPUC
Crotch's Bumblebee survey results	MM BIO-7; CM BIO-G	Both	CPUC
American badger survey results	MM BIO-8; CM BIO-I	Both	CPUC
San Joaquin kit fox survey results	MM BIO-9; CM BIO-J	Both	CPUC
San Joaquin antelope squirrel survey results	APM BIO-9; CM BIO-H	Both	CPUC
Giant kangaroo rat survey results	APM BIO-7; CM BIO-H	Both	CPUC
Migratory nesting birds survey results	MM BIO-5; APM BIO-18; APM BIO-20; CM BIO-8; CM BIO-E	Both	CPUC
Wetlands survey results	MM BIO-10; CM BIO-K	Both	CPUC; CDFW

3.3 NOTICE TO PROCEED PROCESS

LSPGC is required to obtain CPUC authorization prior to initiating construction activities through the NTP process. The NTP process involves LSPGC submitting an NTP request to the CPUC, and the CPUC PM issuing an NTP Authorization Letter.

The CPUC will not authorize construction activities until all relevant preconstruction requirements are completed as appropriate for the relevant stage of the project. Before granting an NTP to LSPGC, the CPUC will confirm that LSPGC has complied with all preconstruction APMs and mitigation measures applicable, including any required surveys, and has obtained all appropriate approvals from other regulatory agencies. The CPUC Project Manager may authorize project activities through one or more NTPs for separate phases of the LSPGC project components as determined necessary. LSPGC may determine the phases based on preconstruction compliance, construction schedule, the anticipated schedule for permit approvals, and other considerations.

Each NTP from LSPGC may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. Construction is defined as all construction-related activities, including but not limited to site clearing; placement of signs, fences, structures, or other materials; or any mobilization activity that would move construction-related equipment and/or materials onto a site.

An NTP request must include the following:

- Description of the work to be performed, including a brief comparison of the proposed work and the project component as described in the Final IS/MND;
- Description of all ancillary activities required for the project component or components (for example, electrical, plumbing, excavation, paving, landscaping, or site restoration);
- Identification of any staging areas that would be used during construction;
- Detailed description of the location of the project component or components covered in the NTP, including maps, photographs, and other supporting documents;
- Estimate of area of total land disturbance and use, both temporary and permanent, associated with the project component or components;
- Expected construction start date and duration of work;
- Anticipated number of construction workers, including total workers and peak number;

- Anticipated equipment required for construction;
- Verification that all relevant preconstruction APMs and mitigation measures have been completed or implemented;
- List of all relevant APMs and mitigation measures that will be implemented;
- Verification that all applicable permits or agency approvals have been obtained for the work covered by the NTP request (if required);
- If some preconstruction compliance items cannot be completed prior to issuance of the NTP, an identification and description of the outstanding submittals, as well as how they will be completed and approved in a timely manner prior to construction; and
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction.

In conjunction with the CPUC Compliance Manager, the CPUC Environmental Monitoring staff will review each NTP request from LSPGC in accordance with the steps outlined below:

- LSPGC submits an NTP request;
- The CPUC Project Manager or Compliance Manager distributes the NTP request to the appropriate resource specialists and reviewers to determine the completeness of the request, as applicable;
- The CPUC Project Manager and/or Compliance Manager also review the NTP and, if needed, prepare a list of outstanding requirements, identifying where additional information or clarification is needed;
- The CPUC Project Manager or Compliance Manager submits any questions and comments, including requests for required additional information or clarification, to LSPGC via email;
- As needed, LSPGC submits 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 the CPUC Project Manager and/or Compliance Manager;
- The CPUC Project Manager and/or Compliance Manager update the Project Implementation Tracker documenting compliance and any outstanding requirements that need to be made conditions of the NTP. If comments or conditions are provided by permitting agencies, these are also considered for incorporation into the NTP approval letter and compliance table;
- The CPUC Compliance Manager prepares the draft NTP Authorization Letter, which documents the scope of work, compliance with all requirements, and list outstanding conditions; and
- The CPUC Project Manager reviews and approves the NTP Authorization Letter and sends the approval to LSPGC.

3.3.1 PG&E Advice Letter Process

Because the PG&E facilities are not part of the application proceeding, PG&E will not submit a NTP request using the process described above in Section 3.3 for LSPGC. Instead, PG&E's work is covered by a notice of construction filed as a Tier 2 advice letter under GO 131-E. However, prior to construction of the PG&E transmission components of the project, PG&E will submit a letter attesting compliance with all applicable measures along with documentation of PG&E's compliance. The CPUC will confirm that PG&E has complied with all preconstruction CMs applicable to them, including any required surveys, and has obtained all appropriate approvals from other regulatory agencies. Construction is defined as all construction-related activities, including but not limited to site clearing; placement of signs, fences, structures, or other materials; or any mobilization activity that would move construction-related equipment and/or materials onto a site.

3.4 MONITORING AND COMPLIANCE REPORTING DURING CONSTRUCTION

As the Lead Agency under CEQA, the CPUC is required to monitor the project to ensure that the APMs, CMs, and mitigation measures are implemented. The Energy Division has primary responsibility for ensuring full compliance with the provisions of the monitoring program. The CPUC Compliance Monitors, under the supervision of the CPUC Compliance Manager, will monitor construction activities in the project areas on a regular basis, particularly when construction activities have the potential to impact a sensitive resource. The project areas are defined in the IS/MND.

3.4.1 LSPGC and PG&E Monitoring and Compliance Reports

LSPGC may elect to have one or more full-time environmental monitors on site on a daily basis to coordinate specialty monitors (such as biologists and archeologists), assist construction crews with interpreting APMs and mitigation measures, and help correct compliance problems in a timely manner. Several APMs and mitigation measures require LSPGC to supply a Specialty Monitor with specific qualifications. Similarly, several of the CMs require PG&E to supply a Specialty Monitor with specific qualifications. These monitors and the related APMs, CMs, and mitigation measures are identified in Table 4 for LSPGC and Table 5 for PG&E.

Table 4 LSPGC Specialty Monitors Required for Pre-Construction Surveys and Construction

Specialty Monitor	Related APM or Mitigation Measure (MM)
Biologist: general	MM BIO-1; MM BIO-2; MM BIO-3; MM BIO-4; MM BIO-5; MM BIO-6; MM BIO-8; MM BIO-9; APM BIO-1; APM BIO-4; APM BIO-7; APM BIO-8; APM BIO-9; APM BIO-20
Biologist: Scientific Collection Permit	MM BIO-3; MM BIO-4
Biologist: bumble bees/insects	MM BIO-7
Archaeologist/Cultural Resources Specialist	MM CR-3; APM CUL-3
Architectural Historian	MM CR-1

Table 5 PG&E Specialty Monitors Required for Pre-Construction Surveys and Construction

Specialty Monitor	Related CM
Biologist: general	CM BIO-1; CM BIO-2; CM BIO-4; CM BIO-8; CM BIO-A; CM BIO-B; CM BIO-C; CM BIO-D; CM BIO-E; CM BIO-F; CM BIO-H; CM BIO-I; CM BIO-J; CM BIO-K; CM GNE-1
Biologist: Scientific Collection Permit	CM BIO-C; CM BIO-D
Biologist: bumble bees/insects	CM BIO-G
Paleontologist (During Construction)	CM PALEO-1
Archaeologist/Cultural Resources Specialist	CM CR-C; CM CUL-1; CM CUL-3
Architectural Historian	CM CR-A

Preconstruction biological and archaeological/cultural surveys are required where appropriate according to the adopted APMs, CMs, and mitigation measures. LSPGC and PG&E's approach to conducting the preconstruction surveys is guided by the project's individual resource treatment plans and will be implemented with the intent of fulfilling the intention of the applicable measures listed in Table 6, Table 7, and Table 8. Preconstruction biological surveys can include a wide range of scopes and schedules. For example, some surveys were required prior to construction but are largely based on seasonal nesting or blooming periods. Additional surveys are required within a specific time frame based on the onset of construction. For example, some mitigation measures require surveys within a maximum of 14 days prior to construction. In addition, preconstruction surveys are required as impact reduction measures for several specific special status species.

The results of each survey will be included in either the individual component preconstruction survey report or the quarterly Environmental Compliance Reports, depending on the timing of the survey and direction of the CPUC. Information gathered from the preconstruction surveys will be forwarded to both the CPUC Compliance Manager and Project Manager for review and concurrence that the surveys were adequate and support the intent of the applicable measures from the MMCRP. In addition, the results of the surveys will be shared at either preconstruction kick-off meetings or routine tailgate meetings with the construction contractors to ensure they know what areas, if any, to avoid or ask for clarification from the environmental monitors. Ongoing preconstruction survey results shall be summarized in the quarterly Environmental Compliance Reports.

3.4.2 CPUC Monitoring and Compliance Reports

The CPUC Compliance Monitors will conduct routine site visits at a reasonable frequency (generally once per week) to determine the project's compliance with the CEQA mitigation. During each site visit, CPUC Compliance Monitors will document observations within the project work areas through field notes and photographs. Monitors will fill out a site inspection form (Attachment B) to document the compliance of specific crews, construction activities, or protection measures. This form acts as a standardized checklist to facilitate inspections and record compliance with APMs, CMs, and mitigation measures that were checked during visits.

The CPUC Compliance Manager will use the site inspection forms and supplemental information provided by LSPGC and PG&E, including preconstruction plan submittals, survey result reports, compliance reports, meeting notes, and agency correspondence, to verify compliance. This information will be compiled into a monthly report that Ascent will submit to the CPUC Project Manager.

3.5 NON-COMPLIANCE INCIDENTS AND STOP WORK ORDERS

The CPUC determines if any construction activity deviates from permit conditions, NTPs, APMs, CMs, or mitigation measures, particularly when the activity puts a sensitive resource at risk, and would be considered a non-compliance incident. This includes all terms and conditions in permits or approvals from other federal, state, and local agencies that are relied upon in the mitigation measures, CMs, and APMs. In addition, an APM, CM, or mitigation measure not implemented by either LSPGC or PG&E according to the timing listed in the Detailed MMCRP table (Tables 8, 9, and 10 in this document) would be considered a non-compliance incident. Examples of non-compliance include, but are not limited to, the following:

- Use of new access roads, staging areas, or extra work spaces not identified on the project drawings or approved for use during construction;
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance;
- Brush clearing outside the approved work limits;
- Grading, foundation, or line work without required biological preconstruction surveys or a biological monitor on site;
- Improper installation of erosion or sediment control structures if they put a sensitive resource at risk; and
- Discharge of sediment-laden trench or foundation hole water into a water body or storm drain.

3.5.1 Non-Compliance Incident Level

The CPUC uses the following levels to categorize the severity of non-compliance incidents:

Minor Compliance Incident: A minor compliance incident is an action that only slightly or partially deviates from project requirements and does not have the potential to cause or cause impact on an environmental resource. Examples include the one-time use of an unapproved, preexisting access road or failure to properly maintain an

erosion or sediment control structure, but the structure remains functional. Repeated minor compliance incidents resulting from the same action or individual may result in elevating the non-compliance level.

Non-compliance Level 1: A Level 1 non-compliance incident is an action that deviates from project requirements or results in the partial implementation of the APMs, CMs, and mitigation measures, but has not caused, nor has the potential to cause, impacts on environmental resources. Examples include failing to properly maintain an erosion control structure, resulting in minor runoff that does not impact a sensitive resource, or work or staging of materials outside of approved work limits where the incident is within a previously disturbed area, such as a gravel lot.

Non-compliance Level 2: A Level 2 non-compliance incident is an action that deviates from project requirements or APMs, CMs, and mitigation measures that have caused, or has the potential to cause, minor impacts on environmental resources. Examples include construction activities occurring within an exclusion zone with indirect impacts to sensitive species or significant cultural or paleontological resources that can be rectified or halted before causing permanent damage. A Level 2 non-compliance notice may also be issued when Level 1 incidents are repeated.

Non-compliance Level 3: A Level 3 non-compliance incident is an action that deviates from project requirements and has caused, or has the potential to cause, major impacts on environmental resources. These actions are not in compliance with the APMs, CMs, mitigation measures, permit conditions, and/or approval requirements (e.g., MPRs, NTPs), and/or violate local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A Level 3 non-compliance notice may also be issued if Level 2 incidents are repeated. Level 3 non-compliance incidents may result in a full or partial project shutdown following a stop-work order from the CPUC Project Manager.

3.5.2 Non-Compliance Reporting

If either LSPGC or PG&E discover a non-compliance incident of any magnitude, they must notify the CPUC Compliance Manager of the incident (self-report). Non-compliance incidents may also be discovered by the CPUC Compliance Monitor, Compliance Manager, or Compliance Director and brought to the attention of either LSPGC or PG&E, or both. For both self-reports and discoveries, the CPUC Compliance Manager may ask either LSPGC or PG&E (depending on which was non-compliant) to submit an email or a formal non-compliance incident report (Attachment C), either of which must include a description of the incident and corrective actions taken or proposed. Upon receipt of the non-compliance incident email or formal report, the CPUC Compliance Manager and/or Project Manager will assign the incident a level, if necessary, and determine next steps for reporting and follow-up. LSPGC and PG&E must each track all non-compliance incidents and include them in their quarterly reports (see Section 3.1.2.2 for reporting procedures).

3.5.3 CPUC Compliance Team Incident Communication Process

The incident communication process is described below.

- A non-compliance incident may be discovered by the CPUC compliance monitoring team (offsite) or observed by the CPUC Compliance Monitor (on site) during a site visit.
  - If the issue puts sensitive resources or human health and safety at risk and a stop-work order is warranted, the CPUC Compliance Manager will contact the CPUC Project Manager and the Environmental Project Manager for either LSPGC or PG&E, depending on which was non-compliant, as described further below. If the non-compliance does not require immediate resolution, the incident will be discussed in a phone call or email to the LSPGC or PG&E Environmental Project Manager or on the bi-weekly conference calls.
  - If the incident is minor and can be easily resolved in the field by providing clarification to construction crews, or if it requires immediate action to prevent an easily avoidable but serious environmental impact, or if time is needed to investigate a compliance incident further, the CPUC Compliance Monitor will notify the CPUC Compliance Manager, who may authorize a temporary hold. The temporary hold will be verbally conveyed

by the CPUC Compliance Monitor to the LSPGC or PG&E Environmental Project Manager to halt construction in a safe manner (see Section 3.5.4).

- Once the issue is resolved, and after the CPUC Compliance Monitor consults with the CPUC Project Manager or Compliance Manager, the Compliance Monitor will verbally authorize the lift of the hold to LSPGC or PG&E's Environmental Project Manager. If the issue is not fully resolved and may require further action or management discussions, the CPUC Compliance Manager will recommend that the CPUC Project Manager issue a stop-work order or initiate a stand-down.
- If onsite LSPGC or PG&E environmental monitors/Environmental Project Managers are unaware of the issue or are aware of an issue but do not act within a reasonable time period to resolve it, the CPUC Compliance Monitor may record the non-compliance in their daily report. Level 1 incidents are "issued" in the site inspection form itself. Level 2 or 3 incident notifications require consultation with the CPUC Compliance Manager and are issued in separate formal reports to LSPGC and PG&E.

- If an incident is self-reported by LSPGC or PG&E, the same procedure listed above should be followed, depending on the incident's severity (see Section 3.5.2 for reporting procedures). LSPGC and PG&E should contact the CPUC Compliance Manager immediately for serious incidents, and report minor compliance incidents via email and possibly a phone call. The CPUC Compliance Manager will send an email notification to the LSPGC or PG&E Environmental Project Manager to ensure tracking of the incident. The CPUC will typically not issue a non-compliance notice for a minor or level 1 self-reported incident.
- Following the initial discovery or report, the CPUC Compliance Manager may request photographs, a written incident description, and other relevant information from LSPGC or PG&E staff concerning the cause and potential resolution of the issue. The CPUC Compliance Manager will direct LSPGC and PG&E to submit the information via email or through a formal non-compliance report, according to the incident's severity. The CPUC Compliance Manager and/or Project Manager may issue a follow-up non-compliance report from the CPUC for the same incident.
- All non-compliance incidents must be described and tracked in LSPGC and PG&E's quarterly report (depending on which was non-compliant) and will be noted in Ascent's monthly report to the CPUC Project Manager. For serious non-compliance incidents, the CPUC Project Manager may issue a stop-work order as described in Section 3.5.4. Work will be suspended within the affected area until a resolution can be planned and the CPUC Project Manager authorizes the resumption of construction activities in writing.
- A stand-down may be initiated by the CPUC Project Manager, Compliance Manager, Compliance Director, or LSPGC or PG&E, as described in Section 3.5.4. In this case, work will be halted temporarily to discuss a current compliance concern and/or re-align compliance activities as appropriate.
- Issues that are not resolved within the length of time agreed upon by LSPGC or PG&E and the CPUC Compliance Manager will be subject to further non-compliance notices and potential stop-work orders.
- Serious or emergency compliance incidents that occur on the weekend or after normal business hours (8am to 5pm) will be addressed by staff identified as emergency contacts on the Project Contact List (Attachment A).
- Permitting agencies may require notification if there is an incident that relates to an agency's jurisdiction over the project. LSPGC and PG&E shall be responsible for notifications to permitting agencies and shall provide copies to the CPUC of official notifications and submittals sent to other agencies. If the CPUC finds that a notification to another agency is required, it may direct LSPGC and PG&E to notify the other agency.

3.5.4 Construction Halts and Stop Work Orders

Several scenarios may occur during project construction for which the CPUC environmental team may need to communicate immediately with field staff to halt construction activity, including the following:

- A temporary hold is a short-term (i.e., less than 8 hours) cessation of construction activities that could be called by CPUC Compliance Monitors. This hold would be used in circumstances where minor clarification of CEQA mitigation or resolution of a minor issue by the field compliance crews is necessary to ensure environmental compliance, or where a serious environmental infraction has occurred without immediate intervention. CPUC Compliance Monitors would consult with the CPUC Project Manager or Compliance Manager in the case of a temporary hold and are authorized to end the hold with clear communication to the LSPGC and PG&E field coordinators, if the monitor confirms that environmental compliance will be achieved. Depending on the issue, a temporary hold could transition to a stop-work order (below)
- If a serious non-compliance or safety issue occurs (e.g., take of a listed species; repeated, high-level non-compliance incidents concerning the same resource; or serious worker injury), the CPUC may elect to issue a stop-work order. The stop-work order would be issued in writing by the CPUC Project Manager, and may require work to stop on all or portions of the project, or on certain construction activities, for a specifically stated time period as determined by the CPUC Project Manager on a case-by-case basis. The stop-work order would also include a timeline for resolution of the situation and any potential recommendations from the CPUC compliance team. Resolution of the compliance issue would be communicated in writing by LSPGC or PG&E to the CPUC Project Manager, who would then issue an end to the stop-work order in writing. LSPGC or PG&E, depending on which entity is issued the stop-work order, would be required to implement any temporary hold or stop-work order in a responsible manner to avoid hazards to public health and safety, as well as to environmental resources. Certain activities cannot be safely halted mid-course, and all work areas must be first safely secured for protection of humans and wildlife prior to complete cessation of work. Additionally, as appropriate, the applicant should address any serious safety issues by calling 911 immediately.
- Either the CPUC Project Manager or Compliance Manager, or LSPGC or PG&E, may initiate a construction stand-down to discuss resolution of a non-compliance or safety issue. A stand-down differs from a stop-work order in that the issue at hand would not immediately result in serious consequences but requires an overall re-alignment of protocols or practices to ensure continued compliance or safety. The stand-down could require work to stop on all, or a portion of, the project for up to one full day, or until a process and schedule for resolution can be determined by CPUC staff and LSPGC or PG&E. The purpose of the stand-down would be to give LSPGC and PG&E the opportunity to re-train construction personnel, confer with management staff to achieve resolution, and/or discuss an issue with the CPUC Compliance Manager or Project Manager. As indicated, a stand-down can be a voluntary action by LSPGC or PG&E and should be issued in writing (email is acceptable) with clear timelines and recommendations outlined. Resolutions resulting from a stand-down should be submitted in writing to the CPUC Project Manager. A stand-down called by LSPGC or PG&E does not require approval by the CPUC to re-start work.

The CPUC environmental team may halt construction of the entire project, or separately halt construction of the LSPGC and PG&E components of the project, depending on the non-compliance scenario.

3.5.5 Public Complaints

The public may complain about the project. LSPGC and PG&E shall document and report all public complaints to CPUC. In their respective quarterly reports, LSPGC and PG&E shall each provide summaries of public complaints and how each complaint was addressed. The CPUC Project Manager will coordinate with LSPGC or PG&E's Construction Relations Officer on the adequacy of corrective actions or additional measures to be implemented, as necessary. Public complaints will not reflect negatively on LSPGC or PG&E's environmental compliance record unless a specific project requirement, permit, or plan requirement was violated.

3.5.6 CEQA Citation Program

Resolution E-4550 (May 9, 2013) created the CEQA Citation Program that authorizes CPUC staff to fine public utilities for non-compliance with CPCNs and permits to construct (PTCs). The program allows CPUC staff to draft and issue

citations and levy fines for non-compliance with a permit. CPUC staff will determine whether a fine is appropriate for non-compliance events consistent with Resolution E-4550. Examples of non-compliance that may result in fines being issued by CPUC staff include but are not limited to the following:

- Continuing construction after an authorized staff person has required construction to stop;
- Starting construction components that have not been approved by the CPUC through an NTP or otherwise;
- Violating nest buffer zones;
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance;
- Grading, foundation, line work, or other ground disturbance without required biological pre-construction surveys or a biological monitor onsite;
- Use of new access roads, overland travel routes, staging areas, or extra work spaces that have not been approved;
- Failure to properly maintain an erosion or sediment control structure;
- Working outside of approved work hours; and
- Project personnel working without training.

3.6 PROJECT CHANGES

This section describes the CPUC's process for staff approval of project changes that may be necessary due to changes resulting after the applicant's final engineering of project elements, or if circumstances arise during the course of construction that require deviations from the project as approved. The CPUC, along with the CPUC Compliance Manager, would evaluate any proposed deviations from the approved project to determine if they are consistent with approved CEQA requirements. Depending on its nature, a requested deviation would be processed as a minor project refinement (MPR) or be the subject of a petition for modification (PFM) submitted by LSPGC or PG&E.

MPRs would be strictly limited to minor project changes that do not trigger additional permit requirements, do not increase the severity of an impact or create a new impact, and are within the geographic scope of the IS/MND.

If a project change would create or have the potential to create a new significant impact, increase the severity of an impact, or occur outside the geographic area evaluated in the IS/MND, LSPGC or PG&E would be required to submit a PFM. The CPUC would evaluate the PFM under CEQA, as appropriate, to determine what form of supplemental environmental review would be required.

Requests for CPUC Project Manager/Compliance Manager approval of a change must be made in writing and should include the following:

- A detailed description of each proposed change, including an explanation of why the deviation is necessary;
- Identification of the APMs, CMs, mitigation measures, project parameter, or other project stipulation for which the change is being requested, and citations for the associated approved documents;
- Photographs, maps, and other supporting documentation illustrating the difference between the existing conditions in the project area, the approved project, and the proposed change;
- The potential impacts of the proposed change, including a discussion of each environmental issue area that could be affected by the changes, with accompanying verification that there would be no increase in significant impacts on resources affected by the project and no new significant impacts, after application of previously adopted APM(s), CM(s), and/or mitigation measure(s);
- Whether the change would conflict with any APMs or mitigation measures if proposed by LSPGC or conflict with CMs if proposed by PG&E;

- Whether the change would conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; and
- The date of expected construction at the change site area.

The CPUC Project Manager or Compliance Manager may request additional information, agency consultations, or a site visit in order to process the request. An MPR request form is included as Attachment D.

Examples of project changes that may be approved by the CPUC Project Manager after final engineering include, but are not limited to:

- Adding a temporary extra work area. The additional work area must be located in a previously disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area, and must not create any new significant impacts or a substantial increase in the severity of a previously identified significant impact.
- Adjusting the alignment of a project component within the study area that was defined in the original environmental analysis to avoid sensitive resources or effects on homeowners, or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.
- Finalizing the engineering design for a project component that was not specifically described in the Final IS/MND, or that requires adjustments in order to facilitate construction. The finalized design must not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

3.7 COMPLIANCE TRACKING

The CPUC will track compliance with CEQA mitigation requirements. The CPUC will also track important project procedures (e.g., formal requests and approvals) and incidents throughout the project. The CPUC will track other information as part of the Ascent-authored Monthly Monitoring Summary Report, including NTP and MPR requests and approvals, resolutions to compliance risks, and documented incidents.

4 DOCUMENTATION AND SUBMITTAL REQUIREMENTS AND MANAGEMENT

4.1 ELECTRONIC SUBMITTALS

All required documentation from LSPGC, including plans, permits, reports, and staff qualifications as required by APMs, CMs, and mitigation measures, will be maintained by LSPGC on an internal website or online database system. LSPGC will ensure that the CPUC team has access to their internal website or database. In addition, LSPGC and PG&E shall provide the CPUC with electronic records (i.e., emails, permits, and authorizations) related to final agency approvals for the project if the CPUC is not directly involved with the coordination effort, pursuant to Public Utilities Code section 314. LSPGC and PG&E must also provide the CPUC with copies of permit amendments and modifications, in addition to notifying the CPUC of proposed permit changes. The electronic records may be submitted over email or transmitted via the online database systems of LSPGC and PG&E.

4.2 ONSITE DOCUMENTATION

In addition, copies of all applicable plans and permits compiled prior to and during construction (e.g., Stormwater Pollution Prevention Plan, Hazardous Materials Management Plan) shall also be kept on site (LSPGC and PG&E construction trailers), and all supervisory staff working on the project should be familiar with their contents.

4.3 ADMINISTRATIVE RECORD

The CPUC Compliance Manager and other members of the Ascent team will compile all required documentation submitted by LSPGC and PG&E into the project's administrative record during construction and will confirm that the record is complete after completion of all activities required by the adopted APMs, CMs, and mitigation measures. The CPUC Compliance Manager will also use this documentation to create a final environmental compliance report or presentation for the CPUC Project Manager that will discuss APM, CM, and mitigation measure implementation and success, with the goal of identifying lessons learned that can be applied to future projects.

4.4 PUBLIC ACCESS

Through the CPUC's public website for the project, members of the public may request copies of records and reports used to track the monitoring program, and the CPUC Project Manager or Construction Manager will send copies of publicly available records and reports to members of the public as requested. Certain mitigation monitoring–related documents will be made available on the project website:

https://ia.cpuc.ca.gov/environment/info/ascent/manning/index.html

5 MITIGATION MONITORING PROGRAM TABLE

Table 6 presents the CEQA mitigation from the adopted Final IS/MND that is applicable to both LSPGC and PG&E. Table 7 presents the additional APMs and mitigation measures that are applicable to LSPGC. Table 8 presents the additional CMs that are applicable to PG&E. Copies of these tables should be kept on-site (LSPGC and PG&E construction trailers), and all supervisory staff working on the project should be familiar with their contents.

Table 6 Final Mitigation Monitoring, Compliance, and Reporting Program – Both LSPGC and PG&E

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
Air Quality			
Construction Measure AQ-A [PG&E] /Mitigation Measure AQ-1 [LSPGC]: The following measure shall apply for LSPGC and PG&E project components and shall supersede and replace LSPGC APM AIR-1 and PG&E CM AIR-1 as presented in the PEA: Construction contractors for the project shall use engines that meet the EPA's Tier 4 emission standards, as defined in 40 CFR 1039, in at least 75 percent of construction equipment with a rating between 100 and 750 hp off-road construction equipment and shall comply with the appropriate test procedures and provisions contained in 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment, as it becomes available, for at least 75 percent of construction equipment and/or by using a combination of engines that meet the EPA's Tier 4 emission standards and battery-electric off-road construction equipment, as long as the total of Tier 4 and battery-electric construction equipment comprises 75 percent of construction equipment. Implementation of this measure shall be required in the contract the project applicant establishes with its construction contractors. LSPGC and PG&E shall separately demonstrate their plans to fulfill the requirements of this measure in a memorandum that shall be submitted to the CPUC before the use of any off-road diesel-powered construction equipment on the site. Each memorandum shall include a list of the equipment and vehicles to be used during construction of LSPGC and PG&E project components with details including equipment/vehicle engine tiers and expected daily and annual usage hours to demonstrate adherence to the 75 percent requirement above	LSPGC and PG&E	LSPGC and PG&E to maintain equipment list and provide upon request to CPUC, along with the memorandum. CPUC mitigation monitor to inspect compliance.	Prior to and during construction.
Biological Resources			
Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]: Conduct Protocol-Level Surveys for Special-Status Plants and Compensate for Impacts Special-status plant surveys described in APM BIO-4 and CM BIO-2 shall follow the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). The surveys will be conducted within suitable habitat during the typical blooming period for the 10 species determined to have potential to occur in the project alignment area as described in Table 3.4-1. If plant species protected under ESA (i.e., San Joaquin woollythreads) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 50 feet will be established around individual plants, and the plants will be avoided. If plant species considered special-status under CEQA (i.e., plants with a CRPR of 1 or 2) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 50 feet will be established around individual plants, and the plants will be avoided, if feasible. The size and shape of the protective buffer may be adjusted if a CPUC-approved biologist determines that a smaller buffer will be sufficient to avoid loss of or damage to special-status plants or that a larger buffer is necessary to sufficiently protect plants from project activities. The appropriate size and shape of	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
the protective buffer will be determined by the CPUC-approved biologist and will depend on the plant's growth form (e.g., annual, perennial), plant phenology at the time of implementation of project activities, the individual species' vulnerability to the project activity, and environmental conditions and terrain. Where avoidance of plants considered special-status under CEQA is not feasible, and the only plants present in a work area are annual plants (see Table 3.4-1), initial disturbances associated with temporary construction work activities will be scheduled to occur after seed set and prior to seedling emergence and when soil is dry. If special-status perennial plants (i.e., recurved larkspur) are present in a work area, this method would not avoid impacts, and these plants would be avoided as described above. When permanent ground disturbing activities cannot be avoided in known annual special-status plant locations the top 4 inches of soil will be collected and retained onsite prior to disturbance and replaced in the same approximate location following completion of project activities. If the surface topography is altered by the work, the surface will be re-contoured to existing conditions, and the salvaged topsoil will be replaced.			
Construction Measure BIO-B [PG&E] /Mitigation Measure BIO-2 [LSPGC]: Conduct Protocol-Level Surveys for Blunt-Nosed Leopard Lizard and Implement Avoidance Measures The following measure shall supersede and replace LSPGC APM BIO-15 for LSPGC project components and PG&E CM BIO-5 for PG&E project components, as presented in the PEA, for blunt-nosed leopard lizard: ▶ Prior to construction of project components in habitats suitable for blunt-nosed leopard lizard (i.e., annual grassland), at least two qualified biologists approved by the CPUC shall conduct surveys following measures in the Approved Survey Methodology for the Blunt-Nosed Leopard Lizard (CDFW 2019) between April and September, including spring adult surveys and fall hatchling surveys. Biologists shall conduct visual search surveys while walking in parallel on adjacent transects that cover all areas within the project site with potential blunt-nosed leopard lizard habitat. Biologists shall stop periodically to scan the transect for blunt-nosed leopard lizard using close-focusing binoculars. The survey methods applied shall be commensurate with the anticipated level of disturbance, as described below. ▶ For project activities that could result in habitat removal: ▪ A total of 12 adult surveys shall take place during the optimal survey period (April 15 to July 15) with a maximum of 4 survey days per week and 8 days within any 30-day time period. At least one survey session shall be conducted for 4 consecutive days, weather permitting. ▪ A total of 5 additional hatchling surveys shall take place during the hatchling optimal survey period (August 1 to September 15). ▶ For operation and maintenance activities that would not result in habitat removal: ▪ A total of 8 adult surveys shall take place during the optimal survey period (April 15 to July 15) with a maximum of 3 survey days per week and 6 days within any 30-day time period. ▪ Fall hatchling surveys are not required for activities in this category. ▶ If blunt-nosed leopard lizards are observed, biologists shall record the location (UTM coordinates) of individuals and the presence of habitat features important for blunt-nosed leopard lizard (e.g., washes,	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as applicable, regarding presence of blunt-nosed leopard lizard.	Prior to and during project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
playas, relative abundance of small mammal burrows). Because this species is designated as Fully Protected under the California Fish and Game Code, complete avoidance of take (i.e., hunting, pursuing, catching, capturing, or killing) is required, unless PG&E and/or LSPGC consult with CDFW and obtain an Incidental Take Permit pursuant to SB 147 (Statutes of 2023) and Fish and Game Code Section 2081.15. PG&E and/or LSPGC will adhere to the provisions and conditions of the Incidental Take Permit that may include compensatory mitigation and would fully mitigate impacts on the species. In the event Fish and Game Code Section 2081.15 is deemed by CDFW to be inapplicable such that incidental take is not permissible, PG&E and/or LSPGC shall initiate consultation with CDFW to determine how the project can be designed to completely avoid take of blunt-nosed leopard lizards and potentially occupied habitat. ▶ All blunt-nosed leopard lizard observations shall be reported to the CNDDB within 30 days. ▶ If no blunt-nosed leopard lizards are observed during the survey period, then further mitigation for this species is not required. Surveys shall be accepted for one year from the date of completion.			
Construction Measure BIO-C [PG&E] / Mitigation Measure BIO-3 [LSPGC]: Conduct Focused Surveys for Special-Status Reptiles and Implement Avoidance Measures ▶ Within 14 days before the initiation of any construction activity, a qualified biologist approved by the CPUC shall conduct a focused visual survey of habitat suitable (i.e., annual grassland, scrub) for California glossy snake, coast horned lizard, and/or San Joaquin coachwhip in the project alignment area and a 100-foot buffer surrounding the project alignment area, which shall include walking linear transects. ▶ If California glossy snake, coast horned lizard, or San Joaquin coachwhip are not detected during the focused survey, the qualified biologist shall submit a report summarizing the results of the survey to LSPGC, PG&E, and the CPUC, and further mitigation shall not be required. ▶ If California glossy snake, coast horned lizard, or San Joaquin coachwhip are detected, a qualified biologist with an appropriate CDFW Scientific Collecting Permit that allows handling of reptiles shall be present during initial ground-disturbance activities and shall inspect the project site before initiation of project activities. If California glossy snake, coast horned lizard, or San Joaquin coachwhip are detected, the qualified biologist shall move individuals into nearby suitable habitat that will not be disturbed by project activities or will allow the individual to move out of the project area of its own volition if it is not in immediate danger.	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Up to 14 days prior to the start of construction and during construction, if applicable.
Construction Measure BIO-D [PG&E] / Mitigation Measure BIO-4 [LSPGC]: Conduct Focused Surveys for Western Spadefoot Toads and Implement Avoidance Measures The following measure shall apply for LSPGC project components and shall supersede and replace PG&E CM BIO-6 for PG&E project components, as presented in the PEA, for western spadefoot toads: ▶ Within 48 hours prior to project implementation within areas containing habitat suitable for western spadefoot toad, a qualified biologist approved by the CPUC shall conduct focused surveys within identified work and access areas that are located in aquatic (i.e., vernal pool, wetland) and upland (i.e., annual grassland) habitats within approximately 860 feet (262 meters) of aquatic habitat (Baumberger et al. 2019)	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS if western spadefoot toad is listed under the ESA.	Within 48 hours prior to the start of construction and during construction, if applicable.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
suitable for the species. Burrows that are unavoidable and considered potentially occupied by western spadefoot toads shall be identified and further examined by a qualified biologist (e.g., with a burrow scope, through hand excavation) to determine whether an adult toad is present in the burrow. ▶ If western spadefoot toads are not found, the qualified biologist shall submit a report summarizing the results of the survey to LSPGC, PG&E, and the CPUC, and further mitigation will not be required. ▶ If western spadefoot toads are detected during focused surveys, then adults, tadpoles, and egg masses shall be relocated by a qualified biologist with a valid CDFW scientific collecting permit to nearby suitable habitat that will not be disturbed by project activities. This relocation is considered adequate to reduce impacts below the level of significance under CEQA. Because western spadefoot is proposed for listing under the ESA, if the species is listed before construction activities begin, LSPGC and PG&E shall consult with the USFWS to determine whether additional measures or permitting is required to comply with the ESA.			
Construction Measure BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC]: Implement Survey Area Minimums, Survey Timing Standards, and Applicable Protocols for Special-Status and Other Native Birds The following measure shall supplement the requirements in APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components), as presented in the PEA, for special-status and other native birds: ▶ Pre-construction nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted within work areas and accessible areas (i.e., existing LSPGC or PG&E rights-of-way, public land, private land with existing access permission) in the following buffers surrounding the work area: ■ 0.5 miles for Swainson's hawk; ■ 500 feet for northern harrier, short-eared owl, and other native raptors; and ■ 250 feet for other native bird species. ▶ To avoid trespassing, inaccessible areas (e.g., private land) shall be surveyed using binoculars or spotting scopes as feasible (i.e., to the maximum distance achievable using these tools). As a result, it may not be feasible to complete surveys in the full survey buffer in all cases; however, LSPGC and PG&E shall implement the full survey buffer wherever feasible. ▶ Nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted no more than 10 days prior to the start of construction activities during the nesting bird season (February 1 to September 15). Continuous construction within an area following a nesting bird survey will negate the need to repeat additional nesting bird surveys. If there is a five day or more lapse in project construction within an area, the nesting bird survey shall be repeated. ▶ Focused surveys for Swainson's hawk shall follow the protocols found in *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee 2000).	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to project construction and during construction, as applicable.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ If an active nest is discovered during nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and construction activities would occur during the nesting bird season, no-disturbance buffers shall be established, within which no ground-disturbing construction activities would occur until the nest is no longer active as determined by a CPUC-approved biologist. No-disturbance buffers shall be at least 0.5 miles for Swainson's hawk, 500 feet for northern harrier, short-eared owl, or other native raptors, 250 feet for non-raptor special-status birds, and 20 feet for other native birds (i.e., without special status). No-disturbance buffer sizes for other native birds (non-raptors) without special status may be increased at the discretion of the CPUC-approved biologist depending on factors including species, nest height, topography, existing vegetative or other barriers between the nest and project activities, and disturbance level surrounding the nest. Any reduction in the no-disturbance buffer for special-status bird species shall require consultation with the CPUC-approved biologist, and would require additional measures, including biological monitoring to determine whether nesting birds are exhibiting disturbance behaviors, after which the no-disturbance buffer size shall be increased. ▶ No-disturbance buffers described in CM BIO-8 (for PG&E components) that would follow the most recent PG&E Nesting Bird Management Plan would be sufficient to maintain impacts on nesting birds at less than significant under CEQA. ▶ If an active Swainson's hawk nest is detected, and implementation of the 0.5-mile no-disturbance buffer is not feasible, LSPGC or PG&E shall consult with CDFW to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.			
Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC]: Conduct Protocol-Level Surveys for Burrowing Owl and Implement Avoidance Measures The following measure shall supersede and replace APMs BIO-6 and APM BIO-10 (for LSPGC components) and CM BIO-7 (for PG&E components), as presented in the PEA, for burrowing owl. LSPGC and PG&E Construction Activities and LSPGC O&M Operational Activities ▶ A qualified biologist approved by the CPUC shall conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet of the work area. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. Surveys shall be conducted according to Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation prepared by the California Department of Fish and Game (now CDFW) (CDFW 2012) or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15, and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as applicable, regarding presence of burrowing owl.	Prior to project construction and during construction, as applicable.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to LSPGC or PG&E and the CPUC, and no further mitigation shall be required. ▶ If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls. ▪ If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls. ▪ The buffer may be adjusted if, in consultation with the CDFW, the qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, the qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and reestablish a buffer consistent with the first item above until the agitated behavior ceases and normal behavior resumes. ▪ The buffer shall remain in place around the occupied burrow and associated satellite burrows until the qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days. ▪ Locations of burrowing owls detected during surveys shall be reported to the CNDDB within 30 days. PG&E O&M Activities ▶ PG&E shall consult with CDFW to determine the appropriate protective buffer distance for active burrowing owl burrows detected in or within 1,640 feet of the project alignment area to avoid take of burrowing owls from O&M activities.			
Construction Measure BIO-G [PG&E] / Mitigation Measure BIO-7 [LSPGC]: Implement Limited Operating Period, Conduct Focused Surveys, and Implement Avoidance Measures for Crotch's Bumble Bee The following measure shall supersede APMs BIO-16 and BIO-17 for LSPGC components and apply for PG&E project components and for Crotch's bumble bee: ▶ Initial ground-disturbing work (e.g., grading, vegetation removal, staging) in grassland habitat or edges of agricultural areas that contain grasses or forbs shall take place between August 15 and March 15, if feasible to avoid impacts on nesting Crotch's bumble bees.	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as applicable, regarding presence of Crotch's bumble bee.	Prior to project construction and during construction, as applicable.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ If the above limited operating period is not feasible (i.e., if limiting ground disturbance to the period between August 15 and March 15 would preclude achieving most of all of the project objectives) as determined by LSPGC or PG&E with concurrence from the CPUC, a qualified biologist approved by the CPUC, familiar with bumble bees of California and experienced using survey methods for bumble bees, shall conduct a habitat assessment and focused survey for Crotch's bumble bee before the start of any ground-disturbing activities in grassland habitat or edges of agricultural areas that contain grasses or forbs. Surveys shall be performed when Crotch's bumble bee is most likely to be identified, typically from April through August (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Surveys shall be conducted during the colony active period the same year as the start of planned construction activities. ▶ LSPGC and PG&E shall submit a survey report to the CDFW and the CPUC within 1 month of survey completion and shall notify the CDFW and the CPUC within 24 hours if Crotch's bumble bees are detected. ▶ If Crotch's bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following: ▪ Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with the CDFW, shall determine the appropriate buffer size to protect nesting colonies. ▪ If nesting colonies are detected, avoidance areas shall be implemented in areas near the colony location that contain significant floral resources for the colony, if present. A qualified biologist shall determine the appropriate avoidance area size to protect foraging resources. ▪ If project activities involving temporary disturbance (e.g., staging) would occur where a nesting colony was detected after the nesting colony is no longer active, the area shall be restored to original conditions after the temporary disturbance is complete such that habitat for Crotch's bumble bee would be available. ▶ If take of Crotch's bumble bee cannot be avoided, LSPGC and PG&E shall obtain an Incidental Take Permit (ITP) from the CDFW and shall implement all avoidance measures included in the ITP. The CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of Crotch's bumble bees such that impacts on the species would be fully mitigated. These measures would include but not be limited to: ▪ specifications for construction timing and sequencing requirements to avoid impacts on nesting Crotch's bumble bees; ▪ pre-construction surveys conducted within 30 days prior to the start of ground-disturbing activities; ▪ establishment of seasonal no-disturbance buffers around nest sites; ▪ construction monitoring;			

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▪ restrictions associated with construction practices, equipment, or materials that may harm bumble bees (e.g., BMPs to minimize the spread of invasive plant species); and ▪ provisions to avoid Crotch's bumble bees or potential Crotch's bumble bees if observed away from a nest during project activity (e.g., ceasing of project activities until the animal has left the work area). ▶ Documentation of compliance with this mitigation measure and any required coordination with the CDFW or acquisition of an ITP shall be provided to the CPUC before commencement of any project construction activities.			
Construction Measure BIO-I [PG&E] / Mitigation Measure BIO-8 [LSPGC]: Conduct Focused Surveys for American Badger and Implement Avoidance Measures The following measure shall supplement the requirements in APMs BIO-6 and BIO-10 (for LSPGC project components) and shall apply for PG&E project components for American badger: ▶ For LSPGC project components, pre-construction wildlife and burrow surveys conducted pursuant to APM BIO-6 and burrow and den avoidance implemented pursuant to APM BIO-10 shall also incorporate American badger. ▶ For PG&E components, the following measures shall be implemented. ▪ Within 14 days before commencement of project activities, a qualified wildlife biologist approved by the CPUC familiar with American badger and experienced using survey methods for the species shall conduct focused surveys of habitat suitable for the species in the project alignment area to identify any American badger dens. ▪ If occupied dens are not found, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation shall not be required. ▪ If occupied dens are found, then dens shall be monitored to determine if occupation is by an adult badger only or if it is a natal den. Impacts on active badger dens shall be avoided by establishing exclusion zones around all active badger dens. If the qualified biologist determines that the den is a natal den, an exclusion zone of 200 feet shall be maintained around the den until the qualified biologist determines that the den has been vacated. If the den is occupied by an adult badger only, the size of the buffer shall be determined by a qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging) shall occur within the exclusion zone until denning activities are complete (i.e., the adult badger and young have left the area) or the den is abandoned, as confirmed by a qualified biologist. The qualified biologist shall monitor each den once per week to track the status of the den and to determine when it is no longer occupied. When the den is no longer occupied, project activities within the exclusion zone may occur. Monitoring reports shall be submitted to the CPUC.	LSPGC and PG&E	LSPGC and PG&E to provide survey results.	Prior to project construction and during construction.
Construction Measure BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC]: Conduct Focused Surveys for San Joaquin Kit Foxes and Implement Avoidance Measures The following measures, in accordance with the *USFWS Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011), shall supersede the	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to project construction and during construction, and during

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
requirements in APMs BIO-8 (for LSPGC components) and CM BIO-4 (for PG&E components) as presented in the PEA for San Joaquin kit fox: ▶ Preconstruction surveys shall be conducted by a qualified biologist no less than 14 days and no more than 30 days prior to the beginning of ground disturbance or construction activities or any project activity likely to adversely affect the San Joaquin kit fox. Surveys shall identify San Joaquin kit fox habitat features in the project alignment area (e.g., dens), evaluate use by kit fox, and assess the potential impacts on the kit fox by the proposed activity. Survey methods shall include thoroughly inspecting suitable habitat in the project alignment area for kit fox dens using walking line transects. The status of all dens shall be determined and mapped. ▪ If no San Joaquin kit foxes or potential dens (i.e., a burrow at least four inches in the diameter that opens within two feet) are found, the qualified biologist shall document the findings in a letter report to USFWS, CDFW, the CPUC, and LSPGC or PG&E, and no further mitigation will be required. ▪ If potential or known San Joaquin kit fox dens are found, exclusion zones shall be established for all dens within the project alignment area, and construction activity and other ground disturbance shall be prohibited within these zones. Potential dens shall be marked with flagged stakes 50 feet from the den entrance. A 100-foot exclusion zone will be established and demarcated using USFWS-approved fencing around the entrance of known dens. ▪ If a natal/pupping den is discovered within the project alignment area or within 200 feet of the project boundary, USFWS, CDFW, and the CPUC shall be immediately notified, and the den shall not be disturbed or destroyed without prior authorization or a take permit. ▪ If potential dens are identified (i.e., a burrow at least four inches in the diameter that opens within two feet), the den entrances shall be dusted, and camera and scent stations shall be deployed for three calendar days to register and track activity of any San Joaquin kit fox present. If no San Joaquin kit fox activity is identified after three days, the den may be removed. Den removal must be appropriately monitored and conducted by a qualified wildlife biologist. ▪ Written results of preconstruction surveys must be received by the CPUC within five days after survey completion and prior to the start of ground disturbance or construction activities. ▶ During construction, LSPGC and PG&E shall observe the following measures throughout the project alignment area to minimize impacts on San Joaquin kit fox: ▪ Artificial lighting of construction sites in the project alignment area during nighttime shall be limited to the extent feasible. ▪ Holes or trenches shall be inspected daily to ensure that no animal has become trapped despite covers. All holes or trenches shall be thoroughly inspected before filling. ▪ All pipes, culverts, or similar structures with a diameter of 4 inches or greater shall be inspected for kit foxes before they are buried, capped, used, or moved in any way. ▪ All trash shall be properly disposed of and removed from the construction site at least once a week. ▪ No firearms shall be allowed on the construction site.		Coordination with CDFW and USFWS, as applicable, regarding presence of San Joaquin kit fox.	construction as applicable.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▪ No pets shall be permitted on the construction site. ▪ Use of rodenticides and herbicides in project areas shall be restricted. ▪ Plastic mono-filament matting shall not be used for erosion control or other purposes. Instead, tightly woven fiber or similar material shall be used. ▪ If a kit fox is trapped: • Personnel shall immediately report the incident to the project biologist. • Escape ramps or structures shall be installed immediately. • If the fox cannot escape, USFWS and CDFW shall be contacted for guidance. • The project biologist shall notify USFWS and CDFW by telephone or email within 24 hours. ▪ If a kit fox is injured or killed: • Personnel shall immediately report the incident to the project biologist. • Project activities shall cease until USFWS and CDFW provide guidance. • The project biologist shall notify USFWS and CDFW immediately with the date, time, and location of the incident. • Consultation with USFWS shall be reinitiated.			
Construction Measure BIO-K [PG&E] / Mitigation Measure BIO-10 [LSPGC]: Implement Avoidance Measures for State or Federally Protected Wetlands and Obtain Permits for Impacts on Wetlands ▶ If potential state or federally protected wetlands identified in the project alignment area can be avoided, a qualified biologist approved by the CPUC shall establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone shall be determined in coordination with the qualified biologist and will depend on the type of wetland present (e.g., seasonal wetland, seep, pond), the timing of project activities (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the project activities, environmental conditions and terrain, and the project activity being implemented. ▪ Project activities (e.g., ground disturbance, vegetation removal, staging) shall be prohibited within the established buffer. The qualified biologist shall periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ If it is determined that disturbance or fill of potential state or federally protected wetlands or waters cannot be avoided, LSPGC and/or PG&E shall submit the appropriate permit applications to the relevant regulatory agencies (e.g., USACE, RWQCB). ▶ If it is determined that fill of waters of the United States would result from project implementation, LSPGC and/or PG&E shall secure authorization for such fill from the USACE through the Section 404 permitting process. Any waters of the United States that would be affected by the project shall be replaced or restored	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USACE and RWQCB, as applicable, regarding presence of state or federally protected wetlands.	Prior to project construction and during construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
on a no-net-loss basis in accordance with the applicable USACE mitigation guidelines in place at the time of construction. In association with the Section 404 permit (if applicable) and prior to the issuance of any grading permit, a Section 401 Water Quality Certification shall be obtained from the Central Valley RWQCB. For impacts on waters of the state that are not also waters of the United States and are therefore not covered by the 401 Water Quality Certification, the applicant shall apply to the RWQCB for Waste Discharge Requirements following the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB 2021). Any waters of the United States or waters of the state that are to be affected by the project shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE and SWRCB mitigation standards in place at the time of construction. If it is determined that disturbance or fill of state protected waters cannot be avoided, LSPGC and/or PG&E shall notify the CDFW before commencing activity that may divert the natural flow or otherwise alter the bed, or bank of any 1602 jurisdictional waterway. If project activities trigger the need for a Lake or Streambed Alteration Agreement, LSPGC and/or PG&E shall obtain such an agreement from the CDFW before the activity commences. LSPGC and/or PG&E shall conduct project construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect fish and wildlife resources, when working within the bed or bank of a lake or stream. These measures may include but shall not be limited to demarcation of the construction area, biological monitoring, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management) such that there would be no net loss.			
Construction Measure BIO-L [PG&E] / Mitigation Measure BIO-11 [LSPGC]: Develop and Implement an Avian Protection Plan ▶ PG&E shall implement its Avian Protection Plan, PG&E's Program to Address Avian Electrocutions, Collisions, and Nesting Birds (PG&E 2018), including all risk reduction measures and training and reporting requirements therein. ▶ LSPGC must follow the recommendations outlined in Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012 or the most current version). In addition, LSPGC shall develop and implement an Avian Protection Plan according to the Avian Protection Plan Guidelines (APLIC and USFWS 2005). The plan shall include measures to minimize collision and electrocution risk to avian species during project operation. The plan shall be submitted for review to the CDFW and USFWS at least 60 days before construction begins.	LSPGC and PG&E	LSPGC to provide Avian Protection Plan. CPUC mitigation monitor to inspect compliance through quarterly reports and verify report. LSPGC coordination with CDFW and USFWS for plan approval.	Prior to project construction (LSPGC) and during project construction (LSPGC and PG&E).
Cultural and Tribal Cultural Resources			
Construction Measure CR-A [PG&E] / Mitigation Measure CR-1 [LSPGC]: Conduct Built Environment Historical Resources Surveys for Built Environment Resources The following measure shall apply to LSPGC project and PG&E components and shall supersede and replace LSPGC APM CUL-2 and PG&E CM CUL-2, as presented in the PEA, for historic resources: Prior to the start of construction, a qualified architectural historian who meets the U.S. Secretary of the Interior Professional Qualifications Standards for History or Architectural History and approved by the CPUC shall perform	LSPGC and PG&E	LSPGC and PG&E to provide survey results.	Prior to project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
historical resources surveys for built environment features for any portion of the project alignment area not yet surveyed (e.g., private properties with access restrictions) within PG&E or LSPGC project component areas. PG&E and LSPGC shall be responsible for ensuring that historical resources surveys for built environment features are conducted throughout all portions of their respective project component areas. For the purposes of this mitigation measure, built-environment features 50 years and older discovered during surveys shall be assumed to be historical resources as defined by State CEQA Guidelines Section 15064.5, and depending on whether the location of the resource is in LSPGC's or PG&E's project area, either LSPGC or PG&E shall be required to comply with Mitigation Measure CR-B. All such resources will be recorded on a California Department of Parks and Recreation DPR 523 primary form or equivalent documentation by a qualified architectural historian.			
Construction Measure CR-B [PG&E] / Mitigation Measure CR-2 [LSPGC]: Protect Historical Built Environment Resources The following measure shall apply for LSPGC and PG&E project components and shall supersede and replace LSPGC APM CUL-2 and PG&E CM CUL-2, as presented in the PEA, for built environment historic resources: ▶ If a built environment historical resource is identified in the project area, PG&E or LSPGC (as applicable, depending on whether the location of the resource is in LSPGC's or PG&E's project area) shall redesign the project to avoid direct or indirect impacts to the building or structure.	LSPGC and PG&E	LSPGC and PG&E to provide project redesign plans, if applicable. CPUC to review and approve revised plans.	Prior to project construction.
Construction Measure CR-C [PG&E] /Mitigation Measure CR-3 [LSPGC]: Conduct Archaeological Resources Surveys and Avoid Archaeological Resources The following measure shall apply for LSPGC and PG&E project components and shall supersede and replace LSPGC APMs CUL-2 and CUL-3 and PG&E CMs CUL-2 and CUL-3, as presented in the PEA, for archaeological resources: Prior to the start of construction, a qualified archeologist who meets the U.S. Secretary of the Interior Professional Qualifications Standards for Archaeology and approved by the CPUC shall perform archeological resources surveys for any portion of the project alignment area not yet surveyed (e.g., private properties with access restrictions) within PG&E or LSPGC project component areas. PG&E and LSPGC shall be responsible for ensuring that archeological resources surveys are conducted throughout all portions of their respective project component areas. For the purposes of this mitigation measure, all archaeological resources discovered during surveys shall be assumed to be unique archaeological resources or historical resources as defined by State CEQA Guidelines Section 15064.5 and will be recorded by a qualified archaeologist on a California Department of Parks and Recreation DPR 523 primary form or equivalent documentation. Each such resource will be indicated, such as via a GIS device, through environmentally sensitive areas (ESA) mapping, with flagging tape, safety fencing, and/or signage designating it as an ESA to ensure that PG&E or LSPGC construction crews and heavy equipment will not intrude on these sites during construction. Mapping or GIS marking will be preferred in locations where there is a higher risk of site looting (e.g., near public roads, on land where the owner appears to be an artifact collector). At the discretion of PG&E or LSPGC, monitoring may be done in lieu of or in addition to marking. If it is determined that the project, as currently designed, cannot avoid impacts on one or more of the sites, then PG&E or LSPGC (as applicable) shall redesign the project so that the archaeological sites will be completely avoided.	LSPGC and PG&E	LSPGC and PG&E to provide survey results. LSPGC and PG&E to provide project redesign plans, if applicable. CPUC mitigation monitor to inspect compliance and review and approve revised plans.	Prior to project construction. During project construction, if appropriate.

Table 7 Final Mitigation Monitoring, Compliance, and Reporting Program – LSPGC Only

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
Aesthetics			
APM AES-1: Staging Area Maintenance and Restoration. All Manning 500/230 Kilovolt Substation Project (Proposed Project) sites will be maintained in a clean and orderly state. Construction staging areas will be sited away from public view where possible. Temporary nighttime lighting will be directed away from residential areas and have shields to prevent light spillover effects. Upon completion of Proposed Project construction, staging and temporary work areas will be returned to pre-Proposed Project conditions, including regrading of the site and reseeding or repaving of disturbed areas to match pre-existing contours and conditions	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction and upon completion of construction.
Agricultural and Forestry Resources			
APM AES-1: Landowner Coordination. LS Power Grid California, LLC (LSPGC) will coordinate with landowners prior to construction and during restoration efforts. Measures to be implemented may include, but are not limited to, the following: ▶ Provide notice to landowners outlining construction activities and restoration efforts. ▶ Restore areas disturbed by construction of the Proposed Project in accordance with lease agreements, applicable operation and maintenance (O&M) standards, and environmental permit requirements. ▶ In areas containing permanent crops (e.g., grapevines or orchard crops) that must be removed to gain access to pole sites for construction purposes, LSPGC may provide compensation to the farmer and/or landowner in coordination with the landowner.	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to construction and during post-construction restoration.
Air Quality			
APM AIR-2: Dust Control. Measures to control fugitive dust emissions will be implemented during construction. These measures will be included in a Fugitive Dust Control Plan that will be prepared in accordance with San Joaquin Valley Air Pollution Control District requirements. The measures will be implemented as needed to control dust emissions. These measures will include, but may not be limited to, the following: ▶ Surfaces disturbed by construction activities will be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance. ▶ Inactive, disturbed (e.g., excavated or graded areas) soil and soil piles will be sufficiently watered or sprayed with a soil stabilizer to create a surface crust, or will be covered. ▶ Drop heights from excavators and loaders will be minimized to a distance of no more than 5 feet. Vehicles hauling soil and other loose material will be covered with tarps or maintain at least 6 inches of freeboard. ▶ Vehicles will adhere to a speed limit of 15 miles per hour (mph) on Proposed Project-specific construction routes and within temporary work areas.	LSPGC	LSPGC to provide Fugitive Dust Control Plan. CPUC mitigation monitor to inspect compliance and verify report.	Dust control plan to be prepared prior to and implemented during construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
Biological Resources			
APM BIO-1: Avoid Environmentally Sensitive Areas. Biological field surveys will be performed for any portion of the Proposed Project area not yet surveyed (e.g., areas that did not have landowner access, new or modified staging areas, pull sites, or other work areas). Sensitive biological resources or areas discovered during surveys will be subject to a buffer from construction activities in accordance with the applicable Proposed Project applicant-proposed measures (APMs). The findings of all biological field surveys on portions of the Proposed Project area not yet surveyed will be provided to the California Public Utilities Commission (CPUC) prior to construction commencing within those areas.	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.
APM BIO-2: Develop and Implement Restoration Plan. A Proposed Project-specific restoration plan will be prepared for areas to be temporarily disturbed by the Proposed Project. Actively cultivated agricultural fields, developed areas, or habitats disturbed as a result of activities not related to the Proposed Project will not be subject to the restoration plan. The restoration plan will include procedures for restoration activities, including plant species to be reseeded, procedures to reduce weed encroachment, and expected timeframes for restoration. Reseeding activities will be conducted in accordance with the Proposed Project Storm Water Pollution Prevention Plan. The restoration plan will be submitted to the CPUC for approval prior to the start of construction activities.	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance and approve the report.	Restoration Plan to be developed prior to project construction. Restoration Plan to be implemented following project construction.
APM BIO-3: Worker's Environmental Awareness Program. A Worker's Environmental Awareness Program (WEAP) will be designed, implemented, and provided to all Proposed Project personnel, including construction supervisors and field personnel, prior to personnel commencing work on the Proposed Project. The WEAP will inform all construction personnel of the resource protection and avoidance measures, as well as procedures to be followed upon the discovery of environmental resources. Additionally, the WEAP will train all construction personnel on hazardous materials management, hazardous wastes and stained or odiferous soils identification, and applicable regulations. The WEAP training will include, at a minimum, the following topics so crews will understand their obligations: ▶ A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to environmental and biological resource protection; ▶ Training on how to identify sensitive or special-status biological resources, environmentally sensitive area (ESA) boundaries, housekeeping (i.e., trash and equipment cleaning), safety, work stoppage, and communication protocol; ▶ A discussion of procedures to be followed in the event that unanticipated sensitive or special-status biological resources are discovered during implementation of the Proposed Project; ▶ A discussion of disciplinary and other actions that could be taken against persons violating environmental and biological resource protection laws and applicant policies; ▶ Training on the handling, storage, and disposal of hazardous materials and wastes in accordance with applicable regulations; ▶ Training on the identification of potentially hazardous wastes and stained or odiferous soils; and	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to project construction. To be completed for all new personnel.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ A statement by the construction company or applicable employer agreeing to abide by the WEAP and other applicable laws and regulations. The WEAP will be submitted to and approved by the CPUC prior to construction.			
APM BIO-4: Pre-Construction Plant Surveys. Prior to initial vegetation clearing and ground-disturbing activities in annual grassland habitat, a qualified biologist will conduct pre-construction surveys of the Proposed Project work area for special-status plants. Surveys will be conducted during the appropriate bloom period for Lost Hills crownscale and Panoche pepper-grass (i.e., April to September and February to June, respectively). No surveys will be conducted in actively cultivated agricultural fields, bare ground, or developed areas. In the event of the discovery of a previously unknown special-status plant, the area will be marked as a sensitive area and will be avoided to the maximum extent practicable. If avoidance of species listed under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA) is not possible, the United States Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW) will be consulted. Any other construction activities that may impact sensitive biological resources, including movement of construction equipment and other activities outside of the fenced/paved areas, will be monitored by a qualified biologist. The monitor/inspector will have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if listed species are present.	Prior to project construction. During project construction, if appropriate.
APM BIO-5: Vehicle Cleaning. Prior to their initial arrival on the Proposed Project site, all construction equipment and vehicles that will travel or operate within annual grassland habitats and/or outside of approved access roads/designated parking areas (e.g., staging yards) within these habitats will be cleaned to avoid spread of noxious weeds and non-native invasive plant species.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to project construction.
APM BIO-7: Pre-Construction Giant Kangaroo Rat Surveys. Prior to the initiation of construction, a qualified biologist will conduct protocol-level surveys of the Proposed Project work area for giant kangaroo rat. Surveys will be confined to Proposed Project work areas within annual grassland habitats, as well as disturbed habitats and agricultural areas within a 500-foot radius of annual grassland habitats. Surveys will conform to the methodology outlined in the San Joaquin Kangaroo Rat Trapping Protocol (USFWS 2013). If species presence is determined through these surveys, the USFWS and CDFW will be consulted to ensure compliance with the FESA and CESA, respectively, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval in accordance with APM BIO-10.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if giant kangaroo rat is present.	Prior to project construction.
APM BIO-8: Pre-Construction San Joaquin Kit Fox Surveys. Prior to the initiation of construction, a qualified biologist will conduct protocol-level surveys of the Proposed Project work area for San Joaquin kit fox. Surveys will be confined to Proposed Project work areas within annual grassland habitats, as well as disturbed habitats and agricultural areas within a 500-foot radius of annual grassland habitats. Surveys will conform to the methodology outlined in the Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 2011). If species presence is determined through these surveys, the USFWS and CDFW will be consulted to ensure compliance with the FESA and CESA, respectively,	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if San Joaquin kit fox is present.	Prior to project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
and species-specific mortality reduction or avoidance plans will be developed for agency review and approval in accordance with APM BIO-10.			
APM BIO-9: Pre-Construction San Joaquin Antelope Squirrel Surveys. Prior to the initiation of construction, a qualified biologist will conduct focused surveys of the Proposed Project work area for San Joaquin antelope squirrel in annual grassland habitats, as well as disturbed habitats and agricultural areas within a 500-foot radius of annual grassland habitats. If species presence is determined through these surveys, the CDFW will be consulted to ensure compliance with the CESA, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval in accordance with APM BIO-10.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as appropriate, if San Joaquin antelope squirrel is present.	Prior to project construction.
APM BIO-10: Burrow and Den Avoidance. If occupied burrows or dens are found during pre-construction wildlife and burrow surveys, adequate buffers will be established around burrows. Adequate buffers will be determined by a qualified biologist based on field conditions and resource agency guidelines. If avoidance of species listed under the FESA or CESA is not possible, the USFWS and/or CDFW will be consulted, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval, as appropriate. These plans may include, but will not be limited to the following: ▶ Detailed description of trapping methodology, ▶ Detailed burrow excavation methods, ▶ Release location(s), ▶ Detailed release methods, ▶ Artificial burrow design and installation methods, ▶ Description of exclusion fencing type and implementation, and ▶ Identification of a wildlife rehabilitation center or veterinary facility capable of and willing to treat injured special-status species. Any other construction activities that may impact burrows occupied by special-status species (including movement of construction equipment and other activities outside of the fenced/paved areas within wildlife habitat) will be monitored by a qualified biologist. The monitor/inspector will have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources.	LSPGC (note APM BIO-10 has been superseded by Mitigation Measure BIO-6 for burrowing owl)	CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if species are present.	Prior to project construction and during construction.
APM BIO-11: Vehicle Travel. Vehicles will adhere to a speed limit of 15 mph on Proposed Project-specific unpaved construction routes where no posted speed limit exists and within temporary work areas. In addition, construction and maintenance employees will be required to stay on established and clearly marked and existing roads and within the limits of disturbance except when not feasible due to physical or safety constraints and will be advised that care should be exercised when commuting to and from the Proposed Project area to reduce accidents and animal road mortality.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
APM BIO-12: Trapped Animal Prevention. All excavated holes/trenches that are not filled at the end of a workday will be covered, or a wildlife escape ramp will be installed to prevent the inadvertent entrapment of wildlife species.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.
APM BIO-13: Delineation of Work Areas. All work areas within the Proposed Project area will be clearly delineated with fencing, staking, or flags prior to construction commencing. Construction activities will be restricted to delineated work areas, and all delineation will be maintained in working order until completion of construction.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.
APM BIO-14: Project Lighting. The use of outdoor lighting during construction and O&M will be minimized whenever practicable. Photocell-controlled lighting (i.e., motion detection) will be provided at a level sufficient to provide safe entry and exit to the proposed LSPGC Manning Substation and control enclosures. All lighting will be selectively placed, shielded, and directed downward and away from sensitive habitat and resources to the maximum extent practicable.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction and operation.
APM BIO-18: Nesting Bird Avoidance. If feasible, construction and vegetation trimming/removal will be avoided during the migratory bird nesting or breeding season (i.e., February 15 to August 31). When it is not feasible to avoid construction during the nesting or breeding season, a survey will be performed in the area where the work is to occur. This survey will be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified, a suitable construction buffer (which will differ based on species and location of nest) will be implemented to ensure that the nesting or breeding activities are not substantially adversely affected. If the nesting or breeding activities are being conducted by a federally or state-listed species, the USFWS and CDFW will be consulted as necessary. Monitoring of the nest will continue until the birds fledge or construction is no longer occurring on the site.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and CDFW, as appropriate, if breeding activities are being conducted.	Prior to project construction. During construction, if appropriate.
APM BIO-19: Vegetation. Vegetation and tree removal will be limited to the minimum area necessary to allow construction to proceed.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.
APM BIO-20: Raptor Nests. If a raptor nest is observed during pre-construction surveys, a qualified biologist will determine if it is active. If the nest is determined to be active, the biological monitor will monitor the nest to ensure that nesting or breeding activities are not substantially adversely affected. If the biological monitor determines that activities associated with the Proposed Project are disturbing or disrupting nesting or breeding activities, the biological monitor will make recommendations to reduce noise or disturbance in the vicinity of the nest, such as temporarily suspending work in the area. If the nest is determined to be inactive, the nest will be removed under direct supervision of the qualified biologist.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to project construction. During construction, if appropriate.
Cultural and Tribal Cultural Resources			
APM CUL-1: Cultural Resources Awareness Training. In accordance with this measure, the Proposed Project's WEAP will include, at a minimum: ▶ Training on how to identify potential cultural resources and human remains during the construction process;	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to project construction. To be repeated for all new personnel.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; ▶ A discussion of procedures to be followed in the event that unanticipated cultural resources are discovered during implementation of the Proposed Project; ▶ A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and policies; and ▶ A statement by the construction company or applicable employer agreeing to abide by the WEAP, and other applicable laws and regulations. The WEAP will be provided to all Proposed Project personnel who may encounter and/or alter historical resources or unique archaeological properties, including construction supervisors and field personnel. No construction worker will be involved in ground-disturbing activities without having participated in the WEAP.			
APM CUL-3: Inadvertent Discoveries. In the event that previously unidentified cultural resources are uncovered during implementation of the Proposed Project, all work within 50 feet of the discovery will be halted and redirected to another location. A qualified archaeologist(s) will inspect the discovery and determine whether further investigation is required. The qualifications of the archaeologist(s) will be approved by the CPUC. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California Department of Parks and Recreation cultural resources records and no further effort will be required. If the resource cannot be avoided and may be subject to further impact, the significance and NRHP and CRHR eligibility of the resource will be evaluated and, in consultation with the CPUC, appropriate treatment measures will be determined. All work will remain halted until a Secretary of the Interior-qualified archaeologist approves the treatment measures. Preservation in place will be the preferred means to avoid impacts to significant historical resources. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, and if the unearthed resource is prehistoric or Native American in nature, a Native American representative, in consultation with the CPUC, will develop additional treatment measures, such as data recovery consistent with CEQA Guidelines Section 15126.4(b)(3)(C-D). Archaeological materials recovered during any investigation will be curated at an accredited curation facility or transferred to the appropriate tribal organization.	LSPGC	LSPGC to provide treatment measures, if applicable. CPUC mitigation monitor to inspect compliance and verify treatment measures.	During project construction.
Geology and Soils			
APM GEO-1: Geological Hazards and Disturbance to Soils. The following measures will be implemented during construction to minimize impacts from geological hazards and disturbance to soils: ▶ Keep vehicles and construction equipment within the limits of the Proposed Project and in approved construction work areas to reduce disturbance to topsoil. ▶ Prior to grading in temporary work areas, salvage topsoil to a depth of 6 inches or to the actual depth if shallower (as identified in a site-specific geotechnical investigation report) to avoid the mixing of soil horizons.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ Avoid construction in areas with saturated soils whenever practical to reduce impacts to soil structure and allow safe access. Similarly, avoid topsoil salvage in saturated soils to maintain soil structure. ▶ Keep topsoil material on site in the immediate vicinity of the temporary disturbance or at a nearby approved work area to be used in restoration of temporarily disturbed areas. Recontour temporarily disturbed areas following construction to match pre-construction grades. Site and manage on-site material storage in accordance with all required permits and approvals. ▶ Keep vegetation removal and soil disturbance to a minimum and limited to only the areas needed for construction. Dispose of removed vegetation off site at an appropriate licensed facility, or it can be chipped on site to be used as mulch during restoration.			
Greenhouse Gas Emissions and Climate Change			
APM GHG-1: Greenhouse Gas Emissions Reduction During Construction. The following measures will be implemented during construction to minimize greenhouse gas emissions: ▶ If suitable park-and-ride facilities are available in the Proposed Project vicinity, construction workers will be encouraged to carpool to the job site. ▶ On-road and off-road vehicle tire pressures will be inflated to manufacturer specifications; tires will be checked and reinflated at regular intervals. ▶ Demolition debris will be recycled for reuse to the extent feasible. ▶ Line power, instead of diesel generators, will be used at all construction sites where feasible. ▶ Construction equipment will be maintained per the manufacturer's specifications.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.
Hazards and Hazardous Materials			
APM HAZ-1: Air Transit Coordination. LSPGC will implement the following protocols related to helicopter use during construction and air traffic: ▶ LSPGC will comply with all applicable Federal Aviation Administration regulations regarding air traffic within 2 miles of the Proposed Project alignment. ▶ LSPGC's helicopter operator will coordinate all Proposed Project helicopter operations with local airports before and during Proposed Project construction. ▶ Helicopter use and landing zones will be managed to minimize impacts on local residents.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.
Noise and Vibration			
Mitigation Measure N-1 [LSPGC]: Implement Measures to Reduce Exposure of Noise-Sensitive Receptors to Construction-Generated Nighttime Noise Construction noise at Sensitive Receptor 1 (R1) (3,400 feet from the substation site) shall not exceed the County's nighttime noise threshold of 45 dBA between the hours of 9:00 p.m. and 7:00 a.m. To minimize noise levels during nighttime construction activities and maintain nighttime noise below the abovementioned County	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
threshold, LSPGC could implement the following measures during nighttime construction work at the Manning Substation site: ▶ Maintain construction equipment and equip with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer recommendations. Equipment engine shrouds shall be closed during equipment operation. ▶ Shut down motorized construction equipment when not in use to prevent idling. ▶ Locate construction equipment and staging areas as far as possible from nearby noise-sensitive land uses. ▶ Equip construction equipment with back-up alarms with either audible self-adjusting backup alarms or alarms that sound only when an object is detected. ▶ Install noise control devices on construction equipment, which may include but are not limited to: high-efficiency mufflers; acoustic dampening; protected internal noise absorption layers; enclosures; alternatively powered equipment; and electric motors. ▶ LSPGC shall notify R1, the single-family residence on Manning Avenue near the proposed Manning Substation, of the expected nighttime work schedule at least 7 days in advance by mail, email, phone call, personal visit, or door hanger. The notice shall contain a contact and telephone number for receipt of any public complaints and questions. The contact shall be responsible for determining the cause of the complaint and implementing any possible measures to alleviate the problem. If unanticipated work, including in emergency situations, extends to the hours of 9:00 p.m. to 7:00 a.m., LSPGC will immediately notify the CPUC and notify R1 via mail, email, phone call or personal visit.			
Utilities and Service Systems			
APM UTIL-1: Conduct an Induction Study. An induction study will be conducted to evaluate the potential effects of the Proposed Project on pipelines in its vicinity. The study will comply with all national and international standards in addition to the following standards: ▶ Pipeline Company Standards and Standard Operating Procedures; ▶ Federal Department of Transportation Part 192 Regulations; ▶ National Association of Corrosion Engineers (NACE) SP0177-2014 Standard Practice; ▶ NACE SP21424-2018 Standard Practice; and ▶ Institute of Electrical and Electronics Engineers Standard 80 Guide. The study will model the electrical interference effects on pipelines during different electrical conditions, such as maximum load and fault conditions. Additionally, the study will perform a coating stress voltage and alternating current (AC) density analysis on the pipelines. The induction study will recommend AC mitigation methods based on the findings. Recommendations of the study will be incorporated into the final engineering and design for the Proposed Project as needed to ensure compliance with applicable standards.	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance and verify final engineering and design.	Prior to project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
Wildfire			
APM FIRE-1: Construction Fire Prevention Plan. A Proposed Project-specific Construction Fire Prevention Plan (CFPP) will be prepared and submitted to the CPUC for review prior to initiation of construction. The CFPP will be fully implemented throughout the construction period and will include, at a minimum, the following: ▶ The purpose and applicability of the plan; ▶ Responsibilities and duties; ▶ Preparedness training and drills; ▶ Procedures for fire reporting, response, and prevention that include the following: ▪ Identification of daily site-specific risk conditions, ▪ The tools and equipment needed on vehicles and to be on hand at sites, ▪ Reiteration of fire prevention and safety considerations during tailboard meetings, and ▪ Daily monitoring of the red flag warning system with appropriate restrictions on types and levels of permissible activity; ▶ Coordination procedures with federal and local fire officials; ▶ Crew training, including fire safety practices and restrictions; and ▶ Method(s) for verifying that all Plan protocols and requirements are being followed. A Proposed Project Fire Marshal or similarly qualified position will be established to enforce all provisions of the CFPP, as well as perform other duties related to fire detection, prevention, and suppression for the Proposed Project. Construction activities will be monitored to ensure implementation and effectiveness of the CFPP.	LSPGC	LSPGC to provide final Construction Fire Prevention Plan. CPUC mitigation monitor to inspect compliance and review final plan.	Prior to and during project construction.

Table 8 Final Mitigation Monitoring, Compliance, and Reporting Program – PG&E Only

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
Aesthetics			
CM GNE-1: Standard Construction Practices. The following standard construction practices will be implemented, as feasible, to reduce the potential for environmental impacts. ▶ Vehicle parking: vehicles and equipment will be parked on pavement, existing roads, and previously disturbed areas to the extent practicable. ▶ Work hours: work will occur only during daylight hours, unless required to occur at night due to line clearances for worker safety. ▶ Vehicle access: the development of new access and right-of-way (ROW) roads will be minimized, and clearing vegetation and blading for temporary vehicle access will be avoided to the extent practicable. ▶ Speed limit: vehicles will not exceed a speed limit of 15 miles per hour (mph) in the ROWs or on unpaved roads within sensitive land-cover types. ▶ Restoration and erosion control: on completion of any Proposed Project component, all areas that are significantly disturbed and not necessary for future operations, shall be stabilized to resist erosion, and revegetated and recontoured if necessary, to promote restoration of the area to pre-disturbance conditions. ▶ Dead or injured listed species: personnel will be required to report any accidental death or injury of a listed species or the finding of any dead or injured listed species to a qualified Biologist. Notification of the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS) of any accidental death or injury of a listed species shall be done in accordance with standard reporting procedures. ▶ Staging Area Maintenance: Work sites will be maintained in a clean and orderly state. ▶ Environmentally Sensitive Areas: Biological field surveys will be performed for areas not yet surveyed. Sensitive biological resources or areas discovered during surveys may be subject to a buffer from construction activities. ▶ Aquatic resources: All aquatic resources will be clearly marked prior to construction within the work areas. If deemed necessary by lead biologist, a buffer from construction activities might be established around these areas. ▶ Vegetation: Vegetation and tree removal will be limited to the minimum area necessary to allow construction to proceed and to meet operational requirements. ▶ Trapped Animals: All excavated holes/trenches that are not filled at the end of the workday will be covered, or a wildlife escape ramp will be installed to prevent the inadvertent entrapment of wildlife. ▶ Delineation of Work Areas: Work areas will be clearly delineated prior to construction commencing with fencing, staking, or flags.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction and upon completion of construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
Agricultural and Forestry Resources			
CM AG-1: Landowner Coordination. Pacific Gas and Electric Company (PG&E) will coordinate with landowners prior to construction and during restoration efforts. Measures to be implemented may include, but are not limited to, the following: ▶ Provide notice to landowners outlining construction activities and restoration efforts. ▶ Areas disturbed by construction of the Proposed Project restored in accordance with lease and easement conditions, applicable operation and maintenance standards, and environmental permit requirements. ▶ In areas containing permanent crops (i.e., grapevines, orchard crops, etc.) that must be removed to gain access to pole sites for construction purposes, PG&E may compensate the farmer and/or landowner in coordination with the landowner.	PG&E	PG&E to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to construction and during post-construction restoration.
Air Quality			
CM AIR-2: Fugitive Dust Control. The following actions will be taken, as applicable and feasible, to control fugitive dust during construction. San Joaquin Valley Air Pollution Control District notifications will be made in accordance with any requirements in effect at the time of construction. ▶ Applying water to disturbed areas and to storage stockpiles. ▶ Applying water in sufficient quantities to prevent dust plumes during activities such as clearing and grubbing, backfilling, trenching, and other earth-moving activities. ▶ Limit vehicle speed to 15 mph. ▶ Load haul trucks with a freeboard (space between top of truck and load) of 6 inches or greater. ▶ Cover the top of the haul truck load. ▶ Clean up track-out at least daily.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.
Biological Resources			
Construction Measure BIO-H [PG&E]: Conduct Focused Surveys for Giant Kangaroo Rat and San Joaquin Antelope Squirrel and Implement Avoidance Measures The following measure shall supersede and replace CM BIO-3 (for PG&E components), as presented in the PEA, for giant kangaroo rat and San Joaquin antelope squirrel: ▶ Prior to the initiation of any construction activity, a CPUC-approved biologist shall conduct a habitat assessment in the project alignment area to identify habitat suitable for giant kangaroo rat and San Joaquin antelope squirrel. The habitat assessment shall consider land cover types associated with these species (e.g., grassland), presence of burrows potentially suitable for the species, and incidental sightings of giant kangaroo rats or San Joaquin antelope squirrels. Where habitat determined to be potentially suitable for these species is identified, the following measures shall apply:	PG&E	PG&E to provide survey results and documentation of measure compliance. CPUC mitigation monitor to inspect compliance. Coordination with CDFW and USFWS, as applicable, regarding presence of giant kangaroo rat and San Joaquin Antelope Squirrel.	Prior to the start of construction. During project construction, as applicable.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▪ Prior to the initiation of any construction activity, a qualified biologist approved by the CPUC, and with a valid USFWS Section 10(a)1(A) recovery permit (for giant kangaroo rat) and valid CDFW scientific collecting permit (for giant kangaroo rat and San Joaquin antelope squirrel), shall conduct surveys of the proposed project work area for giant kangaroo rat and San Joaquin antelope squirrel. Surveys shall be confined to proposed project work areas that overlap the habitat determined to be potentially suitable during the habitat assessment described above, as well as disturbed habitats and agricultural areas within a 500-foot radius of these areas (referred to below as the "survey area"). Surveys for giant kangaroo rat shall conform to the methodology outlined in the San Joaquin Kangaroo Rat Trapping Protocol (USFWS 2013). Surveys for San Joaquin antelope squirrels shall consist of walking transects and visually inspecting the survey area for squirrels and potential burrows. • If giant kangaroo rats or San Joaquin antelope squirrels or potential burrows are determined to be absent during surveys, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation will not be required. • If giant kangaroo rats or San Joaquin antelope squirrels or potential San Joaquin antelope squirrel burrows are determined to be present through these surveys, a qualified biologist shall map all burrows suitable for giant kangaroo rat and San Joaquin antelope squirrels in the survey area. A minimum 50-foot no-disturbance buffer shall be established around all burrows determined to be occupied by giant kangaroo rat or San Joaquin antelope squirrels, within which no project activities shall occur. • If the 50-foot no-disturbance buffers cannot be fully implemented, PG&E shall consult with USFWS and CDFW prior to initiating project activities to determine whether other measures are required to ensure compliance with ESA and CESA, respectively. If additional avoidance is not feasible and take is reasonably certain to occur, PG&E shall obtain an ITP from CDFW (for giant kangaroo rat and San Joaquin antelope squirrel) and USFWS (for giant kangaroo rat) and shall implement all avoidance measures included in the ITP. CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of giant kangaroo rats and San Joaquin antelope squirrels such that impacts on the species would be fully mitigated. These measures would include but not be limited to: • construction monitoring; • restrictions associated with construction practices, equipment, or materials that may harm giant kangaroo rats or San Joaquin antelope squirrels; and • provisions to avoid giant kangaroo rats and San Joaquin antelope squirrels if observed away from a burrow during project activity (e.g., ceasing of project activities until the animal has left the work area).			

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
• Documentation of compliance with this mitigation measure and any required coordination with the USFWS and CDFW, including but not limited to the acquisition of an ITP, shall be provided to the CPUC before commencement of any project construction activities.			
CM BIO-1: Worker Environmental Awareness Training. A qualified biologist will develop an environmental awareness training program that is specific to the Proposed Project. All on-site construction personnel will attend the training before they begin work on the Proposed Project. Training will include a discussion of the construction management practices that are being implemented to protect biological resources as well as the terms and conditions of any Proposed Project permits.	PG&E	PG&E to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to project construction.
CM BIO-2: Special-Status Plants. Prior to initial vegetation clearing and ground-disturbing activities in annual grassland habitat, a qualified biologist will conduct pre-construction surveys of the Proposed Project work area for special-status plants. If a covered plant species is present following special-status plant surveys, a qualified biologist will stake and flag exclusion zones of 100 feet around plant occupied habitat (both the standing individuals and the seed bank individuals) of the covered species prior to performing the activities. If an exclusion zone cannot extend the specified distance from the habitat, the biologist will stake and flag a restricted activity zone of the maximum practicable distance from the exclusion zone around the habitat. This exclusion zone distance is a guideline that may be modified by a qualified biologist, based on site-specific conditions (including habituation by the species to background disturbance levels). If avoidance of plant species listed under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA) is not possible, the USFWS and/or CDFW will be consulted.	PG&E	PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and CDFW, as appropriate, if special status species are present.	Prior to project construction. During construction, if appropriate.
CM BIO-4: San Joaquin Kit Fox. Prior to the initiation of ground-disturbing activities in grassland habitat suitable for foraging and denning, a qualified biologist will conduct pre construction surveys of the Proposed Project work area for San Joaquin kit fox. If San Joaquin kit fox dens are present, their disturbance and destruction will be avoided. Exclusion zones for kit fox will be implemented following USFWS procedures (USFWS 1999) or the latest USFWS procedures. The radius of these zones will follow current standards or will be determined on a case-by-case basis in coordination with the USFWS and CDFW. Maternity dens shall be avoided during pup-rearing season (February 15 through July 1) and a minimum 200-foot buffer established. If dens are located within the proposed work area and cannot be avoided during construction, qualified biologists will determine if the dens are occupied. If unoccupied, the qualified biologist will remove these dens by hand-excavating them in accordance with USFWS procedures for kit fox (USFWS 1999). If occupied, work activities will be delayed until the den is determined to no longer be active.	PG&E	PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and CDFW, as appropriate, if San Joaquin kit fox is present.	Prior to project construction. During construction, if appropriate.
CM BIO-8: Migratory Birds. Prior to work activities conducted during the nesting bird season (February 1 to August 31), the work area will be inspected for nests. If a nest is discovered, a biologist will be contacted to determine the nest status, the species of the nesting birds, and if work activities are likely to impact the nest. If a nest is confirmed active (i.e., the nest contains eggs or young or the adults are exhibiting nesting behaviors such as siting in the nest, carrying food to the nest, etc.), designated avoidance buffers will be required and implemented according to the most recent PG&E Nesting Bird Management Plan and guidance available. The established buffers will remain in effect until the young have fledged or the nest is no longer active, as	PG&E	PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to project construction. During construction, if appropriate.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
confirmed by the biologist. The biologist will have authority to order the cessation of nearby work activities or adjust buffers if nesting pairs exhibit signs of disturbance. Buffer sizes may be reduced if the biologist determines that a reduced buffer size will not result in the abandonment of the nest or failure based on compelling biological and ecological reasoning (e.g., the biology of the bird species, concealment of the nest by topography, land use type, vegetation, and the level of project activity). Inactive nests may be removed in accordance with PG&E's approved avian permits.			
Cultural and Tribal Cultural Resources			
CM CUL-1: Worker Awareness Training. PG&E will provide environmental awareness training on archaeological and paleontological resources protection. This training may be administered by the PG&E cultural resources specialist (CRS) or a designee as a stand-alone training or included as part of the overall environmental awareness training as required by the Proposed Project and will at minimum include: types of cultural resources or fossils that could occur at the Proposed Project site; types of soils or lithologies in which the cultural resources or fossils could be preserved; procedures that should be followed in the event of a cultural resource, human remain, or fossil discovery; and penalties for disturbing cultural or paleontological resources.	PG&E	PG&E to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to project construction. To be repeated for all new personnel.
CM CUL-3: Unanticipated Cultural Resources and Paleontological Discoveries. a. Unanticipated Cultural Resources. If unanticipated cultural resources are inadvertently discovered during site preparation or construction activities, work will stop in that area and within 50 feet of the find until the CRS or their qualified designee can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with PG&E and other appropriate agencies. Work may continue on other portions of the site with the CRS's approval. PG&E will implement the CRS's or their designee's recommendations for treatment of discovered cultural resources. b. Human Remains. In the unlikely event that human remains or suspected human remains are uncovered during pre-construction testing or during construction, all work within 50 feet of the discovery will be halted and redirected to another location. The find will be secured, and the CRS or designated representative will be contacted immediately to inspect the find and determine whether the remains are human. If the remains are not human, the CRS will determine whether the find is an archaeological deposit and whether paragraph (a) of this APM should apply. If the remains are human, the CRS will immediately implement the applicable provisions in Public Resources Code (PRC) Sections 5097.9 through 5097.994, beginning with the immediate notification to the affected county coroner. The coroner has two working days to examine human remains after being notified. If the coroner determines that the remains are Native American, California Health and Safety Code 7050.5 and PRC Section 5097.98 require that the CRS contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC, as required by PRC Section 5097.98, will determine and notify the Most Likely Descendant. c. Paleontological Discoveries.	PG&E	PG&E to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
If significant paleontological resources are discovered during construction activities, work will stop within 50 feet and the PG&E CRS will be contacted immediately. The CRS will work with the qualified paleontologist to evaluate the discovery. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource. Work may not resume within 50 feet of the find until approval by the CRS in coordination with the paleontologist. In the event that significant paleontological resources are encountered during the project, protection and recovery (if feasible and safe) of those resources may be required. Treatment and curation of fossils will be conducted in consultation with the landowner, PG&E, and California Public Utilities Commission (CPUC). The paleontologist will be responsible for developing the recovery strategy and will lead the recovery effort, which will include establishing recovery standards, preparing specimens for identification and preservation, documentation and reporting, and securing a curation agreement from the approved facility.			
Geology and Soils			
CM GEO-1: Minimize Construction in Soft or Loose Soils. Where soft or loose soils are encountered during Proposed Project construction, several actions are available, feasible, and can be implemented to avoid, accommodate, replace, or improve such soils. Depending on site-specific conditions and permit requirements, one or more of these actions may be implemented to eliminate impacts from soft or loose soils: ▶ Locating construction facilities and operations away from areas of soft and loose soil. ▶ Over-excavating soft or loose soils and replacing them with engineered backfill materials. ▶ Increasing the density and strength of soft or loose soils through mechanical vibration and/or compaction. ▶ Installing material, such as aggregate rock, steel plates, or timber mats, over access roads. ▶ Treating soft or loose soils in place with binding or cementing.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.
CM PALEO-1: Unanticipated Paleontological Discoveries. If significant paleontological resources are discovered during construction activities, work will stop within 50 feet and the PG&E CRS will be contacted immediately. The CRS will work with the qualified paleontologist to evaluate the discovery. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource. Work may not resume within 50 feet of the find until approval by the CRS in coordination with the paleontologist. In the event that significant paleontological resources are encountered during the project, protection and recovery (if feasible and safe) of those resources may be required. Treatment and curation of fossils will be conducted in consultation with the landowner, PG&E, and the CPUC. The paleontologist will be responsible for developing the recovery strategy and will lead the recovery effort, which will include establishing recovery standards, preparing specimens for identification and preservation, documentation and reporting, and securing a curation agreement from the approved facility.	PG&E	PG&E to provide/report evidence of compliance CPUC mitigation monitor to inspect compliance.	During project construction.
Greenhouse Gas Emissions and Climate Change			
CM GHG-1: Greenhouse Gas Emissions Reduction During Construction. The following actions will be taken, as feasible, to minimize greenhouse gas emissions.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ Encourage construction workers to carpool to the job site 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 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. ▶ Minimize unnecessary construction vehicle idling time for on-road and off-road vehicles. The ability to limit construction vehicle idling time will depend on 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 Proposed 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 allowed 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. ▶ Maintain construction equipment in proper working conditions in accordance with PG&E 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 California Air Resources Board Statewide Portable Equipment Registration Program. ▶ Minimize welding and cutting by using compression of mechanical applications (utilizing mechanical pressure to create a secure connection between metal components) where practical and within standards. ▶ Encourage use of natural gas-powered vehicles for passenger cars and light-duty trucks where feasible and available. ▶ Encourage recycling construction waste where feasible.			
Hazards and Hazardous Materials			
CM HAZ-1: Hazardous-Substance Control and Emergency Response. PG&E will implement standard hazardous substance control and emergency response procedures to ensure the safety of the public and site workers during construction. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of Proposed Project construction through operation. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on-site. If it is necessary to store 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. Proposed Project construction will involve soil surface blading/leveling, excavation of up to several feet, and auguring to a maximum depth of 35 feet in some areas. In the event that soils suspected of being	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil will be tested, and if contaminated above hazardous waste levels, will be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations. 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. The hazardous substance control and emergency response procedures include, but are not limited to, the following: ▶ Proper disposal of potentially contaminated soils. ▶ Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. ▶ Emergency response and reporting procedures to address hazardous material spills. ▶ Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit.			
CM HAZ-2: Worker Environmental Awareness. The training will include the following components related to hazards and hazardous materials: ▶ PG&E Health, Safety, and Environmental expectations and management structure. ▶ Applicable regulations. ▶ Summary of the hazardous substances and materials that may be handled and/or to which workers may be exposed. ▶ Summary of the primary workplace hazards to which workers may be exposed. ▶ Overview of the controls identified in the Storm Water Pollution Prevention Plan.	PG&E	PG&E to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	During project construction. To be repeated for all new personnel.
CM HAZ-3: Air Transit Coordination. PG&E will implement the following protocols related to helicopter use during construction and air traffic: ▶ PG&E will comply with all applicable Federal Aviation Administration regulations regarding air traffic within 2 miles of the Proposed Project alignment. ▶ PG&E's helicopter operator will coordinate all Proposed Project helicopter operations with local airports before and during Proposed Project construction. ▶ Helicopter use and landing zones will be managed to minimize impacts on local residents.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.
Noise and Vibration			
CM NOI-1: Employ Noise-Reducing Construction Practices during Temporary Construction Activities. PG&E will employ standard noise-reducing construction practices such as the following: ▶ Ensure that all equipment is equipped with mufflers that meet or exceed factory new-equipment standards.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing
▶ Locate stationary equipment as far as practical from noise-sensitive receptors. ▶ Limit unnecessary engine idling. ▶ Limit all construction activity near sensitive receptors to daytime hours unless required for safety or to comply with line clearance requirements. Minimize noise-related disruption by notifying residents. Should nighttime Proposed Project construction be necessary because of planned clearance restrictions, affected residents will be notified at least 7 days in advance by mail, personal visit, or door hanger, and informed of the expected work schedule.			
Traffic and Transportation			
CM TRA-1: Temporary Traffic Controls. PG&E will obtain any necessary transportation and encroachment permits from the California Department of Transportation and the local jurisdictions, as required, including those related to state route crossings and the transport of oversized loads and certain materials, and will comply with permit requirements designed to prevent excessive congestion or traffic hazards during construction. PG&E will develop road and lane closure or width reduction or traffic diversion plans as required by the encroachment permits. Construction activities that are in or along or that cross local roadways will follow best management practices and local jurisdictional encroachment permit requirements—such as traffic controls in the form of signs, cones, and flaggers—to minimize impacts on traffic and transportation in the Proposed Project area.	PG&E	CPUC mitigation monitor to inspect compliance. Coordination with Caltrans and Fresno County, as appropriate.	Prior to and during project construction.
CM TRA-2: Coordinate Road Closures with Emergency Service Providers. At least 24 hours prior to implementing any road or lane closure, PG&E will coordinate with applicable emergency service providers in the Proposed Project vicinity. PG&E will provide emergency service providers with information regarding the road or lanes to be closed; the anticipated date, time, and duration of closures; and a contact telephone number.	PG&E	CPUC mitigation monitor to inspect compliance. Coordination with emergency service providers.	Prior to and during project construction.
Wildfire			
CM FIRE-1: Fire Risk Management. PG&E will follow its standard fire risk management procedures, including: ▶ Safe work practices, training, and fire response. ▶ Proposed Project personnel will be directed to park away from dry vegetation. ▶ During fire season in designated State Responsibility Areas, all motorized equipment driving off paved or maintained gravel/dirt roads will have federally approved or State-approved spark arrestors. ▶ All off-road vehicles will be equipped with a backpack pump (filled with water) and a shovel. ▶ Fire-resistant mats and/or windscreens will be used when welding. In addition, during fire "red flag" conditions (as determined by the California Department of Forestry and Fire Protection), welding will be curtailed. ▶ Every fuel truck will carry a large fire extinguisher with a minimum rating of 40 B:C, and all flammable materials will be removed from equipment parking and storage areas. ▶ Coordinate procedures with federal and local fire officials. ▶ Identification of daily site-specific risk conditions.	PG&E	CPUC mitigation monitor to inspect compliance.	During project construction.

Attachment A

Project and Emergency Contacts

(*confidential and on-file*)

Attachment B

Site Inspection Form

MANNING 500/230 KV SUBSTATION PROJECT

CPUC SITE INSPECTION FORM

Project:	Manning 500/230 kV Substation Project	**Date:**	
Project Proponent: **(Circle Applicable)**	LSPGC PG&E	**Report #:**	
Lead Agency:	California Public Utilities Commission	**Monitor(s):**	
CPUC PM:	Tommy Alexander	**AM/PM Weather**	
Ascent Compliance Manager:	George Dix	**Start/End Time:**	
Project NTP(s):			

Site Inspection Checklist

WEAP Training	**Yes**	**No**	**N/A**
Has WEAP training been completed by all new hires (construction and monitors)?			
Erosion and Dust Control (Air and Water Quality)			
Does on-site diesel equipment match the list in the equipment memorandum on-file with CPUC?			
Have temporary erosion and sediment control measures been installed?			
Are erosion and sediment control measures properly installed and functioning?			
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?			
Is topsoil stockpiled near the active construction area from where it was removed?			
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?			
Are work areas being effectively watered prior to excavation or grading?			
Is excessive fugitive dust leaving the work area?			
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?			
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?			

Are vehicles maintained in good working order with exhaust mufflers and properly inflated tires?			
Are vehicles/equipment turned off when not in use?			
Work Areas			
Is the work area maintained in a clean and orderly state?			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?			
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?			
Are all excavations and trenches covered at the end of the day?			
Biology			
Have preconstruction surveys been completed for biological resources as appropriate? These resources include blunt-nosed lizard, special-status reptiles, Western spadefoot toad, nesting birds, raptors, burrowing owl, Crotch's bumble bee, American badger, and San Joaquin kit fox.			
Have surveys been completed for giant kangaroo rat and antelope squirrel?			
Are biological monitors present onsite?			
Are appropriate measures in place to protect sensitive habitat, nests and burrows, and/or drainages and wetlands (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?			
Have wildlife been relocated from work areas?			
Is vegetation and tree removal minimized to construction area?			
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?			
Did you observe any threatened or endangered species? List:			
Have there been any work stoppages for biological resources?			
Cultural Resources			
Are identified cultural resources that will not be relocated/salvaged clearly marked for exclusion?			
Are archaeological and paleontological monitors onsite if needed?			
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			
Have there been any work stoppages for cultural resources?			
Hazardous Materials and Fire			
Are hazardous materials stored appropriately?			

Are procedures in place to prevent spills and accidental releases?			
Are appropriate fire prevention and control measures in place?			
Are contaminated soils properly handled or disposed of, if applicable?			
Work Hours and Noise			
Are night lighting reduction measures in place, such as directly light downward, as needed?			
Is construction occurring within approved hours?			

AREAS MONITORED (i.e., transmission lines, yards/staging, LSPGC Manning Substation. NOTE: PG&E work within its existing substations is not subject to the monitoring requirements of the MMCRP)
DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)
MITIGATION MEASURES VERIFIED (Refer to Detailed MMCRP Table 6, Table 7, and Table 8. Report only on the measures pertinent to observations today)

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)

COMPLIANCE SUMMARY

Below please describe any non-compliance issues or new biological/cultural discoveries that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form and provide to Ascent Compliance Manager. Inform Ascent Compliance Manager of any non-compliance incidents.

- ☐ New biological or cultural discovery requiring compliance with mitigation measures, APMs, CMs, permit conditions, etc. If checked, please describe discovery and documentation/verification below.
- ☐ Non-compliance – Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, APMS, or CMs, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.
- ☐ Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures, APMs, or CMs that has caused, or has the potential to cause minor impacts on environmental resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.
- ☐ Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the APMs, CMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.
- ☐ Non-compliance issues reported by LSPGC or PG&E: Were there any new non-compliance issues reported by either LSPGC or PG&E monitors since your last visit? If so, please identify if it was LSPGC or PG&E and describe issues and resolution and include the applicable LSPGC or PG&E report identification number.

Date	LSPGC or PG&E	Non-compliance Issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

Representative Site Photographs

Date	Location	Photo	Description

Date	Location	Photo	Description

Date	Location	Photo	Description

Date	Location	Photo	Description

Completed by:	
Firm:	
Date:	

Reviewed by:	
Firm:	
Date:	

Attachment C

Non-Compliance Report Form

MANNING 500/230 KV SUBSTATION PROJECT

CONSTRUCTION NON-COMPLIANCE REPORT

Incident Date:		LSPGC or PG&E:	
Date Submitted:		Report No.	
Location:		Level:	
Relevant Plan/Measure		Current Land Use:	
Sensitive Resources:			

Description of incident:
Pertinent plans/permits/mitigation measures, APMs, or CMs:
Proposed resolution:
Recommend timeline for follow-up:

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager				
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)				
LSPGC or PG&E (whichever is applicable) Environmental Project Manager (if applicable)				

Prepared by: _____ Date: _____

Non-Compliance Level	Example
A Level 1 non-compliance incident is an action that deviates from project requirements or results in the partial implementation of the mitigation measures, APMs, or CM, but has not caused, nor has the potential to cause impacts on environmental resources.	▶ Failure to implement adequate dust control measures resulting in no impact on resources; ▶ Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters); ▶ Inadvertent minor incursion into exclusion area resulting in no harm to sensitive biological or cultural resources; ▶ Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot
A Level 2 non-compliance incident is an action that deviates from project requirements or mitigation measures, APMs, or CMs, and has caused, or has the potential to cause minor impacts on environmental resources.	▶ Work without appropriate permit(s) or approval; ▶ Failure to properly maintain an erosion or sediment control structure, but the structure remains functional, and results in minor impacts on resources (e.g. water courses); ▶ Working outside of approved hours; ▶ Repeated documentation of Level 1 incidents
A Level 3 non-compliance incident is an action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the APMs, CMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law.	▶ Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site; ▶ Eminent danger or documented impact to a sensitive or T&E species; ▶ Repeated deviations from required mitigation measures/requirements that have been documented as Level 2 (Minor Incidents); ▶ Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk

Attachment D

Minor Project Refinement Form

MANNING 500/230 KV SUBSTATION PROJECT

CPUC MINOR PROJECT REFINEMENT FORM

Minor project refinements *are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact, create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.*

Date Requested:

Report No.:

Date Approved:

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s):

Location/Milepost:

Land Use/Vegetative Cover:

Sensitive Resources:

Modification From:

☐ **Permit** ☐ **Plan/Procedure** ☐ **Specification** ☐ **Drawing**

☐ **Mitigation Measure** ☐ **Other:**

Proposed Action(s):

Describe how project refinement deviates from current project. Include photos:

Original Condition:

Justification for Change:

Maps & Figures:

Environmental Impact:

Concurrence (if appropriate):

Resources:			
Biological	☐ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources
Previous Biological Survey Report Reference:			
Cultural	☐ No Resources Present	☐ Resources Present	☐ N/A, changes would not affect resources
Previous Cultural Survey Report Reference:			
Paleontological	☐ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources
Previous Paleontological Survey Report Reference:			
Disturbance Acreage Changes: ☐ Yes ☐ No			

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the Final IS/MND as it relates to MPR-X. MPR-X would have no potential to impact the following environmental resource areas and therefore are not included in the table below: Aesthetics, Agriculture and Forestry Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Recreation.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Air Quality	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Biological Resources	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Cultural and Tribal Cultural Resources	☐ Y	
	☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Agency Consultation?	☐ Y	
	☐ N	
Geology and Soils	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Greenhouse Gas Emissions and Energy	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Hazards and Hazardous Materials	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Hydrology and Water Quality	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Noise and Vibration	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Transportation	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Utilities and Service Systems	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	
Wildfire	☐ Y	
	☐ N	
Agency Consultation?	☐ Y	
	☐ N	