



**Pacific Gas and
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September 17, 2024

Boris Sanchez
California Public Utilities Commission
Energy Division - Infrastructure Permitting & CEQA
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

**RE: Amended Response to Data Request #2, PG&E Northern San Joaquin 230kV
Transmission Project (A.23-09-001)**

Dear Boris,

Pacific Gas and Electric Company (PG&E) received Data Request #2 from the California Public Utilities Commission (CPUC) on August 6, 2024. The CPUC requested clarification on four items, which PG&E has copied below, followed by PG&E's responses.

After PG&E's initial response on August 16, 2024, PG&E continued its consideration of Data Request #2. After further review, we are amending our response related to the second item, Nighttime Construction. Testing and commissioning activities to place the new 230 kV source into service at Lockeford Substation will not require nighttime construction work. In addition, installation of guard structure netting over State Route 88 is expected to take place outside of nighttime work hours. The text from the original Response to Data Request #2 is shown below in track changes to reflect the amendment response.

During our review, PG&E also considered the Applicant-Proposed Measures (APMs) and Best Management Practices and is providing clarifications and edits for consistency. A table with amended APMs and BMPs follow our response to the fourth item in this letter.

1. Helicopter use

Page 4-46 (and 5.13-4) of the PEA indicates: "Because helicopters are not proposed for lifting structure components, it is not anticipated that residents would temporarily be required to vacate their residences. However, in the unlikely event that final construction plans require otherwise, all FAA requirements would be met and PG&E would coordinate with potentially affected residents (providing a minimum of 30 days of advance notice)."

Elsewhere, including page 5.9-23, the PEA indicates: “The use of helicopters to lift and transport structure components, materials, or equipment is not anticipated as the helicopters will only be used to pull a small sock line during stringing activities. Operation and maintenance of the project may require inspections and routine patrols and transmission structure insulator washing via helicopter; however, helicopters would not be required to transport heavy materials for O&M activities.”

Please clarify: *Is there a potential that occupants or residents will need to temporarily vacate homes or businesses due to helicopter activity? How long would this typically last?*

PG&E Response: PG&E does not propose helicopter work that will require temporary relocation of occupants or residents. Construction work areas and access as proposed will allow ground-based construction to install tubular steel poles (TSP). The reference on PEA page 4-46 to the use of helicopters “in the unlikely event that construction plans require otherwise” is intended to acknowledge the remote and speculative circumstance in which ground-based access to construction sites are blocked or otherwise unavailable. PG&E has identified suitable access routes and material staging areas for ground-based construction activities for all project components, other than using a small sock line during conductor stringing activities as noted on PEA page 5.9-23.

2. Nighttime Construction

In Section 3.6.5, “Work Schedule,” (page 3-98) the PEA states: “Work hours generally will be 10 hours per day with construction typically occurring between 7:00 a.m. and 5:30 p.m. Occasionally, work may occur during the evening hours for activities such as monitoring the foundation curing process and testing and commissioning substation components. However, such activities would not normally generate offensive or disturbing noises or lights. Night work is not planned.”

However, on page 3-47, the PEA states “If nighttime work is necessary in the work areas, temporary flood lighting will be situated and directed away from any adjacent properties. Nighttime work may be required when electrical clearances are available or for safe completion of a construction procedure.”

Page 3-57 seems to contradict this, stating: “Clearances will be issued day to day during daylight hours and are not typically issued overnight during the summer or during peak load conditions.”

PG&E has also included APMs related to nighttime work, including APM NOI-5 (related to notification of area residents) and APM NOI-6 (related to horizontal directional drilling).

***Please clarify:** Is there potential for construction to occur after 9:00 p.m.? If yes, what activities might occur (i.e., foundation curing process and testing and commissioning substation components, conductor stringing, direction drilling)? Please provide the equipment type (e.g., truck, loader, forklift) and activity location for any activities that could occur after 9:00 p.m.*

PG&E Response: Yes, there is potential for construction to occur after 9:00 p.m. Construction activities that may occur after 9:00 p.m. include installation of guard structure netting over ~~State Route 88 and possible over other~~ local roads, and PG&E's horizontal directional drill (HDD) activities in South Guild Avenue, ~~and testing and commissioning activities to place the new 230 kV source into service.~~

Guard poles are expected to be installed on private property within PG&E's right-of-way. If the California Department of Transportation (Caltrans) encroachment permit may require netting between the guard structures that will to protect State Route 88 as a condition of its encroachment permit, the permit could potentially require the netting to be installed after 9:00 p.m. If that is required, the guard structures would be installed during daytime work hours in preparation to attach netting. The netting installation would likely take no more than approximately 3-4 hours. Equipment is expected to be one heavy-duty diesel bucket truck and one light-duty truck such as a ¾-ton pick-up truck, 4 x 4. The light-duty truck would be used to transport crew members to the work area and would not idle during the activity. Per APM NOI-1, construction equipment will be turned off when not in use, therefore the bucket truck is not expected to be idling other than when operating to lift the netting to installed guard structure. Based on PG&E's experience, it is anticipated that Caltrans will require the netting installation on a Sunday morning. A rolling stop is expected to be used unless Caltrans requires a temporary road closure in its encroachment permit. Removal of the netting is expected to be allowed during daytime construction hours using a rolling stop where the line will cross SR 88. Although not expected, if Caltrans were to require nighttime netting installation, PG&E would implement a portable construction noise barrier that substantially blocks the line of sight between the bucket truck and the nearest sensitive receptor. Refer to APM NOI-1. A well-implemented portable construction noise barrier could reduce construction noise levels by approximately 10 decibels or more. As noted in the San Joaquin Development Title Update, Chapter 9-404 Noise (effective October 23, 2023), "street, utility, and similar construction projects, or the maintenance or repair thereof, undertaken by, under contract to, or at the direction of the County, the State of California, or a public utility" are exempt from noise limits in Chapter 9-404. This document can be found at <https://www.sjgov.org/commdev/cgi-bin/cdyn.exe/file/Planning/SJC%20Dev%20Title%20Update%2010-26-23b%20Final.pdf#>.

PG&E proposes its trenching and HDD work in South Guild Avenue in Lodi to occur during daytime hours to install the secondary station service to PG&E Thurman Switching Station. It is possible local encroachment permits could require PG&E's trenching and HDD work at night to minimize potential traffic impacts or for other reasons. However, the proposed work areas in South Guild Avenue would maintain at least one lane of traffic in each direction. Refer to *PG&E 12 kV Service Line Extension into PG&E Thurman Switching Station* in PEA Table 3.6-1 for equipment that will be used for this project component in South Guild Avenue.

As discussed in PEA section 3.6.4, Construction Schedule, the western extent of PG&E's Lockeford-Lodi 60 kV line, installation of the western extent of PG&E's Lockeford-Thurman 230 kV line, and testing and commissioning to place the new 230 kV source into service can only occur during an annual outage window of approximately November to March.

The final approximately 0.4 mile of the new PG&E 230 kV line (W44 to W48) will be constructed after PG&E Lockeford-Industrial 60 kV line is partially removed (pole 1 through pole 9) to allow the transmission line to reuse the power line alignment. PG&E Lockeford-Industrial Line will not be modified unless it appears there is sufficient time within the annual approximately November to March single PG&E 60 kV line outage window to remove the portion of the line and any remaining underbuild, install the 230 kV line to PG&E Thurman Switching Station, and complete testing and commissioning to place the new 230 kV source into service. Project work at PG&E Lockeford Substation, PG&E Thurman Switching Station, PG&E remote-end substations and repeater station, and LEU Industrial and LEU Guild substations also must be complete or nearing completion to support feasibility that PG&E and LEU will be able to place the new 230 kV source into service during a seasonal single PG&E 60 kV line outage. If the western end of PG&E Lockeford-Industrial Line is not removed as scheduled, the project will wait until the next outage window, likely the following November to March. Portions of existing 230 kV reconfiguration at PG&E Lockeford Substation and some site restoration at components may be able to occur while the new 230 kV work waits for the next single PG&E 60 kV line outage window.

~~While~~ This construction work only will begin if it appears sufficient time is available to place the new 230 kV source into service in an annual outage window. No work will occur after 9:00 p.m., ~~once this activity begins unforeseen circumstances could require construction after 9:00 p.m. to place the new source into service before demand increases going into summer. Should work be required after 9:00 p.m., the construction activity would most likely be testing and commissioning of the new 230 kV source which would occur within the project's substations or switching station. Refer to PG&E Lockeford Substation~~

~~Phase 3: Dress/Test/Wire Equipment, PG&E Thurman Switching Station Dress/Test/Wire Equipment, and LEU Guild Substation Deliveries, Installations, Testing & Commissioning 2~~ in PEA Table 3.6-1 for a conservative list of equipment that could be used should testing and commissioning need to occur after 9:00 p.m.

Night work for foundation curing will be unnecessary because PG&E will install temporary fencing around foundations as needed during the curing process. Conductor stringing will use rolling stops when crossing roads or use other means in road or railroad encroachment permits to conduct construction activities during daytime hours.

3. Avian Protection Plan

The project includes the following APMs related to collision or electrocution risk for birds:

APM BIO-9: Implement general resource protection measures for PG&E portion of the project. PG&E conductors and ground wires would be spaced sufficiently apart, as feasible, so that raptors cannot contact two conductors or one conductor and a ground wire, causing electrocution (APLIC 2006).

APM BIO-10: Protect birds on PG&E power lines. All PG&E transmission and power lines and PG&E switching station and substation facilities for the project will be designed to be avian-safe as appropriate and feasible, following the intent of Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (APLIC 2006, 2012).

Please clarify: Does PG&E have an existing Avian Protection Plan that it intends to use for the project? If yes, please provide.

PG&E Response: The PG&E Avian Protection Plan for External Distribution (PG&E's Program to Address Avian Electrocutions, Collisions, and Nesting Birds, April 2018) is attached to this response.

4. PG&E Conservation Programs

In addition, the PEA references two PG&E plans related to species conservation.

Please provide: The PG&E San Joaquin Valley Habitat Conservation Plan and the PG&E Valley Elderberry Longhorn Beetle Conservation Program.

PG&E Response: The PG&E San Joaquin Valley Habitat Conservation Plan is available on the US Fish and Wildlife Service website: https://ecos.fws.gov/ecp/report/conservation-plan?plan_id=4229

The PG&E Valley Elderberry Longhorn Beetle Conservation Program is PG&E's implementation of the U.S. Fish and Wildlife Service Biological Opinion (1-1-01-F-0114) dated June 27, 2003. Subject: *Formal Endangered Species Consultation on the PG&E Company Transmission Separation Project* which is attached to this response.

Amended Applicant-Proposed Measures and Best Management Practices

After review of the Exhibit B: Proponent's Environmental Assessment (PEA), Table 3.11-1, Summary Table for Applicant-Proposed Measures and Best Management Practices, and corresponding sections of Chapter 5, Environmental Analysis, PG&E is providing amended language to provide consistency between similar measures, correct typographical errors, provide clarification, and align with revised regulations. The amended measures are shown in tracked changes.

Section 5.4 Biological Resources (BIO)

APM BIO-1: Develop and implement a PG&E Worker Environmental Awareness

Program. A PG&E biologist familiar with resources in the area and with delivering Worker Environmental Awareness Programs will conduct an environmental awareness program for all onsite construction personnel before they begin work on the project. Training will include a discussion of the avoidance and minimization measures that are being implemented to protect biological resources as well as the terms and conditions of project permits. Training will include information about the federal and state Endangered Species Acts and the consequences of noncompliance with these acts. Under this program, workers will be informed of the presence, life history, and habitat requirements of all special-status species that may be affected by the PG&E portion of the project, and about state and federal laws protecting nesting birds, wetlands, and other water resources. An educational brochure will be produced for construction crews working on the project. Color photos of special-status species will be included, as well as a discussion of relevant APMs and specific avoidance or minimization measures for special-status species and habitats. A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to CPUC.

BMP BIO-1: Develop and implement an LEU Worker Environmental Awareness

Program. A biologist for the LEU portion of the project who is familiar with resources in the area and with delivering Worker Environmental Awareness Programs will conduct an environmental awareness program for all onsite construction personnel before they begin work on the project. Training will include a discussion of the avoidance and minimization measures that are being implemented to protect biological resources as well as the terms and conditions of project permits. Training will include information about the federal and state Endangered Species Acts and the consequences of noncompliance with these acts. Under this program, workers will be informed of the presence, life history, and habitat requirements of all special status species that may be affected by the LEU portion of the project, and about state and federal laws protecting nesting birds, wetlands, and other water resources. An educational brochure will be produced for construction crews working on the project. Color photos of special-status species will be included, as well as a discussion of relevant best practices and

specific avoidance or minimization measures for special-status species and habitats. A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to the City of Lodi.

Section 5.5 Cultural Resources (CUL)

APM CUL-1: Develop and Implement Worker Environmental Awareness Program.

Prior to Construction. PG&E will design and implement a worker environmental awareness program that will be provided to all project personnel involved in earth-moving activities. This training will be administered by a qualified cultural resource professional either as a stand-alone training or as part of the overall environmental awareness training required by the project, and may be recorded for use in subsequent training sessions. No construction worker will be involved in field operations without having participated in the worker environmental awareness program, which will include, at a minimum:

- A review of archaeology, history, precontact, and Native American cultures associated with historical resources in the project vicinity
- 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 project
- A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and PG&E policies
- A statement by the construction company or applicable employer agreeing to abide by the Worker Education Program, PG&E policies, and other applicable laws and regulations

A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to CPUC.

BMP CUL-1: Develop and Implement Worker Environmental Awareness Program Prior to Construction.

LEU will design and implement a worker environmental awareness program that will be provided to all project personnel involved in earth-moving activities. This training will be administered by a qualified cultural resource professional either as a stand-alone training or as part of the overall environmental awareness training required by the project, and may be recorded for use in subsequent training sessions. No construction worker will be involved in field operations without having participated in the worker environmental awareness program, which will include, at a minimum:

- A review of archaeology, history, precontact, and Native American cultures associated with historical resources in the project vicinity
 - 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 project
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- A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and ~~PG&E~~LEU policies
 - A statement by the construction company or applicable employer agreeing to abide by the Worker Education Program, ~~PG&E~~LEU policies, and other applicable laws and regulations

A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to the City of Lodi.

Section 5.7 Geology, Soils, and Paleontological Resources (GEO, PAL)

APM PAL-2: PG&E Workers Environmental Awareness Training. Training on paleontological resources protection will be administered for excavation deeper than 3 feet below ground surface ~~bgs~~ at all PG&E work locations. It may be provided by the PG&E project Paleontologist or Archaeologist as a stand-alone training or it may be included as part of the overall environmental awareness training as required by the project.

- The training will include the following:
- The types of fossils that could occur at the project site
- The types of lithologies in which the fossils could be preserved
- The procedures that should be taken in the event of a fossil discovery
- Penalties for disturbing paleontological resources

A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to CPUC.

BMP PAL-2: LEU Workers Environmental Awareness Training. Training on paleontological resources protection will be administered for excavation deeper than 3 feet below ground surface ~~bgs~~ at all LEU work locations. It may be provided by the LEU project Paleontologist or Archaeologist as a stand-alone training or it may be included as part of the overall environmental awareness training as required by the project.

- The training will include the following:
- The types of fossils that could occur at the project site
- The types of lithologies in which the fossils could be preserved
- The procedures that should be taken in the event of a fossil discovery
- Penalties for disturbing paleontological resources

A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to the City of Lodi.

Section 5.8 Greenhouse Gas Emissions (GHG)

APM GHG-1: PG&E Minimize GHG Emissions.

PG&E will implement the following to minimize GHG emissions:

- Minimize unnecessary construction vehicle idling time. The ability to limit construction vehicle idling time will depend on the sequence of construction activities
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and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project will apply a “common sense” approach to vehicle use, so that idling is reduced as far as possible below the maximum of five 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 supervisors 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 manufacture specifications.
- Minimize construction equipment exhaust by using low-emission or electric construction equipment where feasible. Portable diesel fueled construction equipment with engines 50 horsepower or larger and manufactured in 2000 or later will be registered under the CARB Statewide Portable Equipment Registration Program.
- Minimize welding and cutting by using compression ~~or~~ or mechanical applications where practical and within standards.
- Encourage use of natural gas-powered vehicles for passenger cars and light-duty trucks where feasible and available.
- On road and off-road vehicle tire pressures will be maintained to manufacturer specifications. Tires will be checked and re-inflated at regular intervals.
- Use line power instead of diesel generators at construction sites where line power is available.
- If suitable park-and-ride facilities are available in the project vicinity, construction workers will be encouraged to carpool to the job site.
- Encourage the recycling of construction waste where feasible.

APM GHG-2: PG&E Minimize SF6 Emissions. PG&E will implement the following to minimize SF6 emissions:

- ~~PG&E will employ standard best practices, such as minimizing vehicle trips and keeping vehicles and equipment well maintained during PG&E operations, and would comply with CARB Early Action Measures (CARB 2011c) as these policies become effective.~~
 - Comply with the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear, sections 95350 to 95359, title 17, CCR.
 - ~~Incorporate PG&E Thurman Switching Station and PG&E Lockeford Substation’s modification into PG&E’s systemwide SF6 emission reduction program. CARB has adopted the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear, sections 95350 to 95359, title 17, CCR, which requires that companywide SF6 emission rate not exceed 1% by 2020. Since 1998, PG&E has implemented a programmatic plan to inventory, track, and recycle SF6 inputs, and inventory and monitor systemwide SF6 leakage rates to facilitate timely replacement of~~
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leaking breakers. PG&E has improved its leak detection procedures and increased awareness of SF6 issues within the company. X-ray technology is now used to inspect internal circuit breaker components to eliminate dismantling of breakers, reducing SF6 handling and accidental releases. As an active member of EPA's SF6 Emission Reduction Partnership for Electrical Power Systems, PG&E has focused on reducing SF6 emissions from its transmission and distribution operations and has reduced the SF6 leak rate by 89% and absolute SF6 emissions by 83%.

- ~~Require that the breakers at PG&E Thurman Switching Station and PG&E Lockeford Substation have a manufacturer's guaranteed maximum leakage rate of 0.5% per year or less for SF6.~~
- Maintain substation breakers in accordance with PG&E's maintenance standards.
- ~~Comply with California Air Resources Board Early Action Measures as these policies become effective.~~

BMP GHG-2: LEU Minimize SF6 Emissions. LEU will implement the following to minimize SF6 emissions:

- LEU will employ standard best practices—such as minimizing vehicle trips and keeping vehicles and equipment well maintained—during LEU operations, and would comply with CARB Early Action Measures (CARB 2011c) as these policies become effective.
- Comply with the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear, sections 95350 to 95359, title 17, CCR. Incorporate LEU Guild substation into LEU's systemwide SF6 emission reduction program. CARB has adopted the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear sections 95350 to 95359, title 17, CCR, which requires that companywide SF6 emission rate not exceed 1% by 2020.
- ~~Require that the breakers at LEU Guild Substation have a manufacturer's guaranteed maximum leakage rate of 0.5% per year or less for SF6.~~
- Maintain substation breakers in accordance with LEU's maintenance standards.
- ~~Comply with California Air Resources Board Early Action Measures as these policies become effective.~~

Section 5.9 Hazards, Hazardous Materials, and Public Safety (HAZ)

APM HAZ-4: PG&E Worker Environmental Awareness Training Program. A PG&E worker environmental awareness training program (WEAP) will be developed and implemented prior to construction. The WEAP program training will be established administered to communicate environmental concerns and appropriate work practices to all construction field personnel before they begin work on the project. The training program will emphasize site specific physical conditions to improve hazard prevention and will include a review of the SWPPP, which also will address spill response and proper best practices implementation. The PG&E WEAP program will be provided separately to CPUC staff prior to construction. A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to CPUC. ~~If it is necessary to store chemicals, they~~

~~will be managed in accordance with all applicable regulations. SDSs will be maintained and kept available onsite, as applicable.~~

BMP HAZ-4: LEU Worker Environmental Awareness Training Program. An LEU WEAP will be developed and implemented prior to construction. The WEAP ~~program training~~ will be ~~established-administered~~ to communicate environmental concerns and appropriate work practices to all construction field personnel before they begin work on the project. The training program will emphasize site specific physical conditions to improve hazard prevention and will include a review of the SWPPP, which also will address spill response and proper best practices implementation. A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to the City of Lodi.~~If it is necessary to store chemicals, they will be managed in accordance with all applicable regulations. SDSs will be maintained and kept available onsite, as applicable.~~

APM HAZ-5: PG&E Potentially Contaminated Soil or Groundwater. Soil or groundwater occurring at PG&E project components that is suspected of being contaminated (based on existing analytical data or visual, olfactory, or other evidence) and is removed during excavation activities will be segregated and tested if pre-characterization has not occurred.~~;~~ ~~if~~ the soil or groundwater is contaminated above hazardous levels, it will be contained and disposed of offsite at a licensed waste facility. The presence of known or suspected contaminated soil or groundwater will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.

APM HAZ-5: LEU Potentially Contaminated Soil or Groundwater. Soil or groundwater occurring at LEU project components that is suspected of being contaminated (based on existing analytical data or visual, olfactory, or other evidence) and is removed during excavation activities will be segregated and tested if pre-characterization has not occurred.~~;~~ ~~if~~ the soil or groundwater is contaminated above hazardous levels, it will be contained and disposed of offsite at a licensed waste facility. The presence of known or suspected contaminated soil or groundwater will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations

Section 5.10 Hydrology and Water Quality (HYD)

APM HYD-2: PG&E Worker Environmental Awareness Program. The PG&E worker environmental awareness ~~program will be developed and provided separately to CPUC staff prior to construction.~~ The worker environmental awareness program will communicate environmental issues and appropriate work practices specific to PG&E project components to all field personnel before they begin work on the project. These will include spill prevention and response measures from the PG&E SWPPP and proper implementation of best practices. A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to CPUC.~~A copy of the PG&E worker environmental awareness program record will be provided to CPUC for recordkeeping at the completion of the project. A PG&E environmental monitoring program also will be implemented to ensure that the plans are followed throughout the construction period for PG&E project components.~~

BMP HYD-2: LEU Worker Environmental Awareness Program. LEU's worker environmental awareness program will communicate environmental issues and appropriate

work practices specific to LEU project components to all field personnel before they begin work on the project. These will include spill prevention and response measures from the LEU SWPPP and proper implementation of best practices. An LEU environmental monitoring program also will be implemented to ensure that the plans are followed throughout the construction period for LEU project components. A copy of the training materials and training sign-in sheets documenting participation in the training will be provided to the City of Lodi.

APM HYD-3: Project Site Restoration. As part of the final construction activities, PG&E will restore all removed curbs and gutters, repave, and restore landscaping or vegetation as necessary for its portion of the project. Within the City of Lodi, PG&E will repair or replace damaged or removed stormwater infrastructure in kind in or in conformance with current City design standards, whichever is deemed most appropriate by City staff through the encroachment permit process. Completion of the required restoration of the stormwater infrastructure will be verified by the City of Lodi.

BMP HYD-3: Project Site Restoration. As part of the final construction activities, LEU will restore all removed curbs and gutters, repave, and restore landscaping or vegetation as necessary for its portion of the project. Within the City of Lodi, LEU will repair or replace damaged or removed stormwater infrastructure in kind in or in conformance with current City design standards, whichever is deemed most appropriate by City staff through the building permit process. Completion of the required restoration of the stormwater infrastructure will be verified by the City of Lodi.

Section 5.13 Noise (NOI)

APM NOI-2: PG&E Noise Minimization with Portable Barriers

Compressors and other small stationary equipment used during construction of PG&E project components will be shielded with portable barriers if appropriate and if located within approximately 200 feet of a residence or if determined by PG&E to be appropriate.

Section 5.20 Wildfire (WFR)

APM WFR-1: PG&E Construction Fire Prevention Plan. A project-specific Construction Fire Prevention Plan for construction of the project will be prepared prior to initiation of construction by PG&E. The PG&E plan will be provided to~~approved by~~ the CPUC and the local fire agencies with jurisdiction over the areas where the project is located at least 90 days prior to the initiation of construction activities in areas designated as very high or high FHSZs. Plan reviewers also will include federal, state, or local agencies with jurisdiction over areas where the project is located. The final plan will be approved by the CPUC at least 30 days prior to the initiation of construction activities. The plan will be fully implemented throughout the construction period, and it will include the following at a minimum:

- The purpose and applicability of the plan;
 - Incorporation of the requirements in PG&E's current Utility Standard for Preventing and Mitigating Fires While Performing PG&E Work;
 - Responsibilities and duties for compliance;
 - Preparedness training and drills;
 - Procedures for fire reporting, response, and prevention that include:
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- Identification of daily site-specific risk conditions
- The tools and equipment needed on vehicles and on hand at sites
- Reiteration of fire prevention and safety considerations during tailboard meetings
- Daily monitoring of the Red-Flag Warning System with appropriate restrictions on types and levels of permissible activity
- Coordination procedures with federal, state, and local fire officials
- Crew training, including the construction fire prevention practices described in APM WFR-2
- Method(s) for verifying that all plan protocols and requirements are being followed

A project Fire Marshal or similar qualified person will be responsible for training project personnel and enforcing all provisions of the PG&E Construction Fire Prevention Plan, as well as performing other duties related to fire detection, prevention, and suppression for the project. Construction activities will be monitored to ensure implementation and effectiveness of the plan.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s

Erin Rice
Senior Land Planner

Enclosure(s):

Attachments 1 - 2

cc:

Heather Blair, Ascent

Mathew Swain, PG&E Law Department

Colleen Taylor, Jacobs