

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 14, 2022

Mr. Dave Schober
PacifiCorp
825 Northeast Multnomah, Suite 940
Portland, OR 97232

Subject: *Notice to Proceed (NTP) 2 – Lassen Substation Project – Transmission Pole Replacements / Placements & Distribution Improvements (Application No. A.15-11-005)*

Dear Mr. Schober:

PacifiCorp has requested authorization from the California Public Utilities Commission (CPUC) to complete transmission pole replacements /placements and distribution improvements as described in the NTP Request #2 dated June 8, 2022.

The Lassen Substation Project was evaluated in accordance with the California Environmental Quality Act (CEQA) and a Permit to Construct (PTC) was granted by the CPUC on May 6, 2019, (Decision D.19-04-011). **NTP 2 is granted by CPUC for the proposed construction activities based on the following factors:**

- The Final Mitigated Negative Declaration for the Lassen Substation project defined required mitigation measures to be implemented prior to project construction. The relevant mitigation measures for construction activities under this Notice to Proceed are summarized in *Attachment A* and shall be implemented by PacifiCorp and its designated contractor. PacifiCorp's compliance with the pre-construction component for each measure is noted in the status table.

The conditions noted below shall be met by PacifiCorp and its contractors:

- **APM-BIO-01, 07, 12:** Prior to proceeding with construction activities under NTP-2, PacifiCorp will notify CPUC of pre-construction survey results and completion date.
- **APM-BIO-05:** Prior to proceeding with work in proximity to wetland areas, PacifiCorp will provide methods (e.g., high density polyethylene (HDPE) driving mats, portable road platforms) to access pole replacement sites.
- **APM-WQ-03:** Prior to proceeding with construction activities under NTP-2, PacifiCorp will provide documentation verifying avoidance and minimization measures have been incorporated into the project design.

Mr. Dave Schober
June 14, 2022

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Rosauer". The signature is fluid and cursive, with a horizontal line drawn underneath it.

Michael Rosauer
CPUC Environmental Project Manager

*cc: M. Leis, Dudek
A. Rice, Dudek
Kim Quinn, Mike Strand, POWER*

Att: Attachment A – Mitigation Measures

ATTACHMENT A
Mitigation Measures

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Applicable to NTP-2, Pre-Construction Requirements Met/Applicable During Construction	
Applicable to NTP-2, See Conditions in NTP	
Applicable to NTP-2, Pre-Construction Requirements Not Met	
Not Applicable to NTP-2	

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions	Applicable/ Pre-Construction Requirements Met
<i>Air Quality</i>					
APM-AQ-1	<p>Construction Pollutant Reduction Measures: Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:</p> <ul style="list-style-type: none"> ● Minimize soil disturbance. ● Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site. ● Curtail earthmoving activities on windy days. ● Ensure that the engines of all construction equipment are properly tuned. ● Limit the maximum speed to 15 miles per hour on unpaved surfaces. ● Replant vegetation in disturbed areas as quickly as possible. ● Implement other effective particulate matter control measures, as needed. <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> ● Use California Air Resources Board-certified construction equipment, where available. ● Use alternative fuel types for construction equipment where feasible. ● Use local building materials. ● Limit construction vehicle idling time. <p>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> ● Use California Air Resources Board-certified construction equipment, where available. ● Use alternative fuel types for construction equipment where feasible. ● Use local building materials. ● Limit construction vehicle idling time. 	PacifiCorp to implement measure as defined and incorporate commitments into construction contracts.	<p>The California Public Utilities Commission (CPUC) to ensure that commitments have been incorporated into construction contract specifications.</p> <p>CPUC to inspect periodically to ensure that dust control measures are being implemented and that idling times are limited.</p>	Prior to and during construction.	<p>Dust Control Plan Submitted to CPUC on 08/09/19. Memo to CPUC documenting inclusion commitments into construction contract submitted on 02/23/21.</p>
<i>Biological Resources</i>					

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APM-BIO-1	<p>Focused pre-construction surveys for special-status plant species shall be conducted in appropriate habitat and at the time of year when species are both evident and identifiable (typically when the species is flowering or fruiting), according to U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) protocols for species having a specified protocol, or according to standard, scientifically accepted systematic surveys appropriate for each species. Surveys shall be conducted in areas of planned ground disturbance prior to such disturbance occurring. If special-status plant species are located during focused surveys within the project footprint area, avoidance of these plants shall be the first priority and can include such measures as modifications in the placement of transmission poles, access and spur roads, and of various marshalling and staging areas in accordance with the final project design and needs.</p> <p>If avoidance is not possible, relocation efforts, including topsoil salvage and relocation, if necessary, will be implemented. If PacifiCorp proposes any changes to the current construction plan or pole replacement sites after focused surveys for special-status species are conducted, additional field surveys shall be required prior to construction activities.</p> <p>Pre-construction biological clearance surveys shall be conducted to avoid or minimize potential impacts to special-status wildlife species. This includes surveys for bat species, which shall be conducted by a qualified bat biologist and shall include focused searches for daytime and maternal roost sites appropriate for the bat species most likely to be roosting within the project right-of-way. If active bat roosts are discovered during pre-construction surveys, the qualified bat biologist shall coordinate with CDFW on appropriate avoidance/minimization measures, including the type and timing of such measures, to be implemented. If active special-status mammal burrows are located during surveys, avoidance measures shall be incorporated and the Environmental Monitor shall proceed as described in APM-BIO-6.</p> <p>Any special-status plant or wildlife species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</p>	<p>PacifiCorp to conduct focused pre-construction surveys and pre-construction clearance surveys, as defined.</p> <p>PacifiCorp to implement avoidance measures, avoidance modifications, or relocation efforts, as defined and as applicable.</p> <p>PacifiCorp to conduct additional field surveys prior to construction, as applicable.</p> <p>PacifiCorp to consult with CDFW regarding appropriate bat avoidance/minimization measures, as applicable.</p> <p>PacifiCorp to report observed special-status species to the California Natural Diversity Database (CNDDB), as applicable.</p>	<p>PacifiCorp to provide survey report documentation and verification to CPUC of compliance with measure as defined.</p> <p>PacifiCorp to provide documentation to CPUC regarding avoidance measures, modifications, and efforts.</p> <p>PacifiCorp to provide documentation to CPUC of consultation with CDFW regarding appropriate bat avoidance/minimization measures, as applicable.</p> <p>CPUC to inspect periodically to ensure that identified avoidance measures and any identified agency requirements are being implemented, as applicable.</p> <p>PacifiCorp to provide documentation to CPUC of special-status species reporting to the CNDDB, as applicable.</p> <p>PacifiCorp to provide resume(s) of qualified bat biologist(s) to CPUC.</p>	<p>Prior to construction.</p>	<p>Revegetation Plan submitted to CPUC on 08/09/19 and documentation of CDFW approval (02/24/20) was provided on 05/07/20.</p> <p>Willow Flycatcher Surveys are in process and results to be provided per NTP-2 conditions of approval.</p> <p>Botanical Survey Report submitted to CPUC on 8/9/20 and approved by CDFW on 2/24/20</p> <p>Bat Survey Report are in process and results to be provided per NTP-2 conditions of approval.</p> <p>Documentation of data submitted to CNDDB provided to CPUC on 05/07/20.</p>
APM-BIO-2	<p>Prior to first use, the undercarriages, wheels, and bodies of construction and operations equipment previously used outside of the project area shall be thoroughly washed in maintenance yards by high-pressure jets to eliminate any soil buildup that may contain invertebrates, such as insects and insect eggs, or the seeds of exotic plant species.</p>	<p>PacifiCorp to implement measure as defined and incorporate commitments into construction contracts.</p>	<p>CPUC to ensure that commitments have been incorporated into construction contract specifications.</p> <p>CPUC to inspect periodically to ensure that construction and operations equipment washing requirements are being implemented.</p>	<p>Prior to and during construction.</p>	<p>Memo to CPUC documenting inclusion commitments into construction contract submitted on 02/23/21.</p>
APM-BIO-3	<p>Every reasonable effort shall be made to minimize temporary and permanent removal of native vegetation at work areas. If required, native vegetation shall be flagged for avoidance. If native vegetation cannot be avoided, it will be crushed or cut rather than bladed or rooted out. A project revegetation plan shall be prepared</p>	<p>PacifiCorp to prepare a revegetation plan, as defined.</p>	<p>PacifiCorp to provide a copy of the revegetation plan to CPUC.</p> <p>PacifiCorp to provide resume(s) of qualified botanist(s) to CPUC.</p>	<p>Prior to, during, and after construction.</p>	<p>Revegetation Plan submitted to CPUC on 8/9/19 and documentation of CDFW</p>

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APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions	Applicable/ Pre-Construction Requirements Met
	for areas of native vegetation temporarily affected by project construction activities. The revegetation plan shall be prepared by a qualified botanist or revegetation specialist and submitted to the California Department of Fish and Wildlife for review prior to any construction or ground disturbance of the area that will be temporarily impacted. The plan shall include, at a minimum, a discussion of the following: qualifications and experience of individuals performing the revegetation; methods (including soil preparation, seeding, planting, irrigating) to be used to revegetate the impacted area; monitoring methods and data to be collected on the revegetated area; success criteria; steps to be taken if the revegetation is not successful; and adaptive management to be implemented.	<p>PacifiCorp to flag native vegetation avoidance areas, as applicable.</p> <p>PacifiCorp to incorporate vegetation treatment requirements into construction contracts.</p> <p>PacifiCorp to develop revegetation plan in consultation with CDFW.</p>	<p>CPUC to ensure that commitments have been incorporated into construction contract specifications.</p> <p>PacifiCorp to provide documentation to CPUC of plan review by CDFW and consultation with CDFW.</p> <p>CPUC to inspect periodically to ensure that construction activity is not occurring in flagged avoidance areas.</p>		approval (02/24/20) was provided on 05/07/20.
APM-BIO-4	Construction crews shall avoid affecting the streambeds and banks of any streams along the route, to the extent feasible. If necessary, a Lake and Streambed Alteration Agreement (LSAA) will be prepared and submitted to the California Department of Fish and Wildlife for review and approval prior to construction in the affected area. Impacts shall be mitigated based on the terms of the LSAA. No streams with flowing waters or those capable of supporting special-status species would be expected to have permanent adverse impacts from project implementation.	<p>PacifiCorp to avoid impacts to streambeds and stream banks or obtain an LSAA and implement identified mitigation measures, as defined.</p> <p>PacifiCorp to clearly mark or flag avoidance areas.</p>	<p>PacifiCorp to provide a copy of the LSAA to CPUC, as applicable.</p> <p>PacifiCorp to provide documentation to CPUC of mitigation as outlined in the LSAA, as applicable.</p> <p>CPUC to inspect periodically to ensure that construction activity is not occurring in avoidance areas.</p>	Prior to and during construction.	During permitting, PacifiCorp received email correspondence from CDFW stating that the Project does not need a LSAA (01/31/17).
APM BIO-5	To avoid impacts from temporary access to wetland areas, existing access roads and temporary access methods (e.g., high density polyethylene (HDPE) driving mats, portable road platforms) shall be used to access pole replacement sites. Results of the wetland delineation (Appendix D of the PEA) shall be incorporated into vehicle access routes, which shall be designed to avoid and minimize wetland disturbance. Access to pole extraction and placement locations that will occur within wetland areas, particularly those north of the existing substation that are more prone to water inundation during wet years, will be conducted when conditions are dry and ground saturation would not pose an issue for vehicle access.	<p>PacifiCorp to use existing access roads, implement temporary access methods, and access when conditions are dry, as defined.</p> <p>PacifiCorp to design access routes considering the project's wetland delineation, as defined.</p>	<p>PacifiCorp to provide CPUC a copy of access design.</p> <p>CPUC to inspect periodically to ensure that impact avoidance measures are being implemented, as defined.</p>	Prior to and during construction.	PacifiCorp to provide access design information per NTP-2 conditions.
APM BIO-6	Environmental Monitors shall be assigned to the project, and will be responsible for ensuring that impacts to special-status species, native vegetation, wetlands, wildlife habitat, and unique resources are avoided to the fullest extent possible. The monitor shall delineate and mark for avoidance in the field all known sensitive resource locations and, where appropriate, use flagging to delineate boundaries of areas from where activities are restricted to protect wetlands, native plants and wildlife, or special-status species. If the monitor determines that project activities may adversely affect the species, the monitor shall have authority to halt construction activities until the monitor can consult with the U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife regarding appropriate avoidance measures. These restricted areas shall be monitored during construction to ensure their protection.	<p>PacifiCorp to retain qualified environmental monitor(s) and implement measure as defined.</p> <p>Monitors to clearly delineate and flag avoidance areas and monitor conditions during construction activities.</p> <p>Monitors to consult with USFWS and/or CDFW, as applicable.</p>	<p>PacifiCorp to provide resumes of qualified environmental monitors to CPUC.</p> <p>CPUC to inspect periodically to ensure that construction activity is not occurring in avoidance areas.</p>	Prior to and during construction.	Environmental Monitor resumes provided to CPUC on 09/04/19 and 02/23/21.

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APM BIO-7	PacifiCorp shall conduct all pole installation, conductor installation, tree trimming, tree removal, grading, and clearing of vegetation from September 1 to February 28, outside of the nesting season. The March 1–August 31 nesting season dates are guidelines: nesting season may begin earlier or end later depending on weather conditions; nests will be protected regardless of the calendar date. If construction cannot be completed outside of the nesting season, pre-construction surveys within the project area will be conducted by a qualified biologist for nests prior to ground disturbance, tree trimming, or other construction activities. The nesting bird clearance survey will be conducted within 3 days prior to construction activities. For passerines, a 50-foot buffer will be installed around the nest and maintained around the nest until the young have fledged. A larger buffer may be required if nesting birds appear stressed. Nesting raptors require a larger buffer area than passerines. If a raptor nest is observed, a 300-foot buffer will be installed. If a nesting raptor is observed within 300 feet of the project area prior to the start of construction, a qualified biologist will determine whether or not construction activities could potentially disturb nesting raptors and implement appropriate measures (e.g., on-site monitor, timing restriction) to adequately protect nesting raptors. Any special-status bird species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.	<p>PacifiCorp to conduct construction activities outside of nesting season or conduct pre-construction nesting surveys, as defined, and identify and delineate buffers prior to construction activity, as defined. Buffer delineation flagging to be maintained, as defined.</p> <p>PacifiCorp to retain qualified biologist(s) and implement measure as defined.</p> <p>PacifiCorp to provide documentation to CPUC of special-status species reporting to the CNDDDB, as applicable.</p>	<p>PacifiCorp to provide survey report documentation and verification to CPUC of compliance with measure as defined.</p> <p>CPUC to inspect periodically to ensure that buffer areas are being avoided and flagging is being maintained, as applicable.</p>	Prior to and during construction.	<p>See BIO-6 re: resumes.</p> <p>See conditions in NTP-2.</p>
APM-BIO-8	A Worker Environmental Awareness Program (WEAP) shall be prepared and all construction crews and contractors shall be required to participate in WEAP training prior to starting work on the project. The WEAP training shall include a review of the special-status species and other sensitive resources that could occur in the project area, the locations of any existing sensitive resources, their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all personnel trained shall be maintained.	PacifiCorp to implement a worker environmental awareness training program, as defined.	<p>PacifiCorp to provide a copy of worker environmental awareness training materials to CPUC.</p> <p>PacifiCorp to provide documentation of personnel training in weekly compliance reports.</p>	Prior to and during construction.	Copy of WEAP provided to CPUC on 01/12/20, and updated for construction.
APM-BIO-9	Migratory bird flight paths in the project area are currently unknown. An impact assessment study and bird observation surveys shall be conducted according to the Avian Power Line Interaction Committee's (APLIC 1994) survey protocol. The surveys shall be conducted in wetlands along both sides of the existing transmission line within the study area. The surveys shall be done in consultation with the California Department of Fish and Wildlife. Results of the bird observation surveys will determine potentially impacted species and locations to mark wires to increase their visibility to flying birds. Line markers should be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2012 (APLIC 2012), evaluated and approved by PacifiCorp engineers prior to implementation.	<p>PacifiCorp to prepare an impact assessment study and bird observation surveys, as defined.</p> <p>PacifiCorp to install line markers in accordance with defined standards.</p>	<p>PacifiCorp to provide to CPUC a copy of the impact assessment study and survey results.</p> <p>PacifiCorp to provide documentation to CPUC of consultation with CDFW.</p> <p>PacifiCorp to provide to CPUC engineer approval of identified line markers.</p>	Prior to and during construction.	Documentation of 2019 consultation with CDFW was provided to CPUC on 05/07/20. Per CDFW, the proposed of the study is to mark wires to increase visibility to flying birds and prevent electrocutions. Per previous avian studies. It was determined that there was not enough open water in the wetland area to attract large number of waterfowl to this area

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					and the majority of waterfowl observed were flyovers. No raptors were observed nesting on the site or near the power lines. Per CDFW, the mitigation measure is not necessary.
APM-BIO-10	Vehicles shall be restricted to previously established roadways and access routes.	PacifiCorp to restrict vehicle access as defined.	CPUC to inspect periodically to ensure that access restrictions are being implemented.	During construction.	
APM-BIO-11	Trash, dumping, firearms, open fires, hunting, and pets shall be prohibited in the project area.	PacifiCorp to prohibit identified actions/items in the project area.	CPUC to inspect periodically to ensure that measure is being implemented.	During construction.	
APM-BIO-12	If construction within and near potential willow flycatcher (<i>Empidonax traillii</i>) habitat (riparian scrub and surrounding wet meadow) cannot be completed outside of the willow flycatcher nesting season (June 1 through August 31), broadcast surveys shall be conducted to determine presence/absence of the species prior to construction activities. If absence is determined, construction may begin within the potential willow flycatcher habitat. If presence is determined, flycatcher nests shall be buffered by 500 feet, or as otherwise determined in consultation with the California Department of Fish and Wildlife, and construction activities shall not occur within the buffer area for the remainder of the nesting season. Any willow flycatcher observed during surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.	PacifiCorp to conduct construction within and near willow flycatcher habitat outside of nesting season, or conduct pre-construction surveys as defined. If surveys determine flycatcher presence, PacifiCorp to install and maintain buffers in consultation with CDFW, as defined, and restrict construction activity, as defined. PacifiCorp to retain qualified biologist(s) and implement measure as defined. PacifiCorp to provide documentation to CPUC of reporting to the CNDDDB, as applicable.	PacifiCorp to provide survey report documentation and verification to CPUC of compliance with measure as applicable. CPUC to inspect periodically to ensure that buffer areas are being avoided and flagging is being maintained, as applicable.	Prior to and during construction.	See conditions in NTP-2.
APM-BIO-13	Operation and maintenance activities that must occur in or near potential willow flycatcher habitat (riparian scrub and surrounding wet meadow) shall be conducted outside of the willow flycatcher nesting season (June 1 through August 31), whenever practicable. If project construction occurs within habitat occupied by nesting willow flycatcher, because the species is state listed as endangered, a state Incidental Take Permit would be required.	PacifiCorp to implement measure during operations and maintenance period, as defined. PacifiCorp to obtain an Incidental Take Permit, as applicable.	PacifiCorp to provide a copy of the Incidental Take Permit to CPUC, as applicable.	Prior to, during, and after construction.	
MM-BIO-1	A topsoil salvage and relocation plan shall be prepared that includes the following information: (1) a description of the methods to be utilized with any topsoil salvage or plant relocation, (2) a description of the receiving location for salvaged topsoil or relocated plants, (3) a discussion of the criteria and measures to be used to determine success of relocated plants, (4) monitoring to be implemented to measure the success of plant relocation, and	PacifiCorp to prepare and implement a topsoil salvage and relocation plan, as defined.	PacifiCorp to submit a copy of the plan and documentation of CDFW approval to CPUC. CPUC to inspect periodically to ensure that plan measures are being implemented.	Prior to and during construction.	A copy of the Revegetation Plan was submitted to CPUC on 08/09/19 and documentation of CDFW approval (02/24/20) was provided on 5/7/20.

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	(5) adaptive management to be used in association with any plant relocation. Any topsoil salvage and/or plant relocation plans shall be reviewed and approved by the California Department of Fish and Wildlife.	PacifiCorp to submit plan to CDFW for review and approval.			
<i>Geology and Soils</i>					
APM-GEO-1	The project will be designed and constructed in accordance with recommendations included in the project-specific geotechnical investigation: site grading, excavation and utility trenches, foundations, mitigation of soil corrosivity on concrete, seismic design criteria, and unpaved site access road.	PacifiCorp to design and construct project as defined.	PacifiCorp to provide documentation to CPUC that project design and construction meets the geotechnical investigation recommendations.	Prior to and during construction.	Geotechnical Investigation Addendum and Field Earth Resistivity Testing Report submitted to CPUC on 09/13/20. Documentation that the project design and construction meets the geotechnical investigation recommendations was provided to CPUC on 02/23/21.
<i>Greenhouse Gas Emissions</i>					
APM-AQ-1	<p>Construction Pollutant Reduction Measures: Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:</p> <ul style="list-style-type: none"> • Minimize soil disturbance. • Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site. • Curtail earthmoving activities on windy days. • Ensure that the engines of all construction equipment are properly tuned. • Limit the maximum speed to 15 miles per hour on unpaved surfaces. • Replant vegetation in disturbed areas as quickly as possible. • Implement other effective particulate matter control measures, as needed. <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> • Use California Air Resources Board-certified construction equipment, where available. • Use alternative fuel types for construction equipment where feasible. • Use local building materials. • Limit construction vehicle idling time. 	PacifiCorp to implement measure as defined and incorporate commitments into construction contracts.	<p>CPUC to ensure that commitments have been incorporated into construction contract specifications.</p> <p>CPUC to inspect periodically to ensure that dust control measures are being implemented and that idling times are limited.</p>	Prior to and during construction.	See APM AQ-1, above.

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	<p>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> ● Use California Air Resources Board-certified construction equipment, where available. ● Use alternative fuel types for construction equipment where feasible. ● Use local building materials. ● Limit construction vehicle idling time. 				
<i>Hazards and Hazardous Materials</i>					
APM-HAZ-1	<p>Health and Safety Plan. A health and safety plan shall be prepared and made available once a contractor is procured for the construction of the proposed project. The plan should include, and not be limited to, information on the appropriate personal protective equipment to be used during construction. All transport of hazardous materials would be in compliance with applicable laws, rules and regulations, including the acquisition of required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations.</p>	<p>PacifiCorp to prepare and implement a health and safety plan, as defined.</p>	<p>PacifiCorp to submit a copy of the health and safety plan to CPUC.</p> <p>CPUC to inspect periodically to ensure that plan requirements are being implemented.</p>	<p>Prior to and during construction.</p>	<p>The Injury and Illness Prevention Plan was submitted to CPUC on 01/12/21.</p>
APM-HAZ-2	<p>Hazardous Substance Control and Emergency Response Plan. PacifiCorp shall prepare and implement a Hazardous Substance Control and Emergency Response Plan as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of project construction through operation. The plan would include, but not be limited to, 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 would be managed in accordance with all applicable regulations. Material safety data sheets would be maintained and kept available on site, as applicable.</p> <p>All hazardous materials and hazardous wastes would 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:</p> <ul style="list-style-type: none"> ● 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 	<p>PacifiCorp to prepare and implement a Hazardous Substance Control and Emergency Response Plan, as defined.</p> <p>PacifiCorp to manage hazardous materials and hazardous wastes according to defined procedures.</p> <p>PacifiCorp to complete its Emergency Action Plan Form, as defined.</p>	<p>PacifiCorp to submit a copy of the Hazardous Substance Control and Emergency Response Plan to CPUC.</p> <p>CPUC to inspect periodically to ensure that plan requirements are being implemented.</p>	<p>Prior to and during construction.</p>	<p>Hazardous Materials, Emergency Response, and Spill Prevention, Control, and Countermeasure Plan submitted on 08/09/19 and stamped on 02/17/21.</p>

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	<p>resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit.</p> <p>PacifiCorp will complete its Emergency Action Plan Form as part of project tailboard meetings. The purpose of the form is to gather emergency contact numbers, first aid location, work site location, and tailboard information.</p>				
APM-HAZ-3	<p>Spill Prevention, Countermeasure, and Control (SPCC) Plan. An SPCC plan shall be prepared and certified by a professional engineer; a complete copy would be maintained on site. The SPCC plan would include engineered and operational methods for preventing, containing, and controlling potential releases and provisions for a quick and safe cleanup.</p>	<p>PacifiCorp to prepare an SPCC plan, as defined. PacifiCorp to implement plan measures and keep a copy of the SPCC plan on site for the duration of construction.</p>	<p>PacifiCorp to submit a copy of the SPCC plan to CPUC.</p> <p>CPUC to inspect periodically that plan requirements are being implemented.</p>	<p>Prior to and during construction.</p>	<p>See APM HAZ-2.</p>
MM-HAZ-1	<p>Prior to demolition of the Mount Shasta Substation and/or the on-site residences, a lead-based paint and asbestos survey shall be conducted by a California Occupational Safety and Health Administration-certified asbestos consultant and/or certified site surveillance technician and a California Department of Public Health-certified lead inspector/risk assessor or sampling technician. The existing Mount Shasta Substation shall also be surveyed for the presence of polychlorinated biphenyls (PCBs), mercury, and other contaminants of concern prior to site demolition activities. A report documenting material types, conditions, and general quantities will be provided, along with photos of positive materials and diagrams. Demolition or renovation plans and contract specifications shall incorporate any abatement procedures for the removal of material containing PCBs, mercury, asbestos, or lead-based paint, including the appropriate soil management protocol and disposition. All abatement work shall be done in accordance with federal, state, and local regulations.</p>	<p>PacifiCorp to conduct surveys and prepare a report, as defined.</p> <p>PacifiCorp to include abatement procedures in demolition and renovation plans and contract specifications, as defined.</p> <p>PacifiCorp to implement abatement procedures during demolition activities.</p>	<p>PacifiCorp to submit a copy of the survey report to CPUC.</p> <p>CPUC to ensure that commitments have been incorporated into construction contract specifications.</p>	<p>Prior to and during construction.</p>	<p>A copy of the survey was provided to CPUC on 01/12/20.</p> <p>Memo to CPUC documenting inclusion commitments into construction contract submitted on 02/23/21.</p>
MM-HAZ-2	<p>Develop and Implement a Lassen Substation Project Fire Plan. PacifiCorp shall develop a Lassen Substation Project Fire Plan in consultation with Mount Shasta Fire Department, the Mount Shasta Fire Protection District, and the California Department of Forestry and Fire Protection. PacifiCorp shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the consulted agencies prior to the initiation of construction activities and shall be implemented during all construction activities by PacifiCorp. At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions • Proper use of construction equipment • Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days • Fire coordinator and fire patrol roles and responsibilities 	<p>PacifiCorp to prepare a Fire Plan, including consultation with and approval by identified fire agencies, as defined.</p> <p>PacifiCorp to implement plan components, as defined, and monitor construction activities for adherence to the plan.</p>	<p>PacifiCorp to submit a copy of the Fire Plan, and documentation of fire agency consultation and approval, to CPUC.</p> <p>CPUC to inspect periodically to ensure that plan requirements are being implemented.</p>	<p>Prior to and during construction.</p>	<p>A copy of the Fire Plan was submitted to CPUC on 08/09/19 Approved by CalFire 08/23/19 (documentation provided 05/07/20) Approved by Mt. Shasta Fire Dept. 09/06/19 (documentation provided 10/23/20)</p> <p>Approved by Mt. Shasta Fire Protection District 08/17/20 (documentation provided 10/23/20)</p>

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APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions	Applicable/ Pre-Construction Requirements Met
	<ul style="list-style-type: none"> • Emergency fire suppression equipment/tools, including size and documentation of response time capabilities • Worker training for fire prevention, initial attack firefighting, and fire reporting • Emergency communication, response, and reporting procedures • Coordination with local fire agencies to facilitate agency access through the project site • Emergency contact information • Worker education materials, tailgate meetings • Compliance with applicable wildland fire management plans and policies established by state and local agencies • Other information as provided by responsible and consulted agencies 				
<i>Hydrology and Water Quality</i>					
APM-WQ-1	<p>Stormwater Pollution Prevention Plan (SWPPP) or Erosion Control Plan Development and Implementation. An erosion and sediment control plan would be developed prior to construction and included as part of the required SWPPP. The goal of the SWPPP will be to remove sediment and wastes from runoff before the runoff is discharged from the project site. This would be accomplished by:</p> <ul style="list-style-type: none"> • Minimizing the acreage of disturbed and exposed soil during the construction phase and implementing stabilization measures where necessary. • Removing sediment from runoff before it leaves the site. • Complying with specific erosion and sediment control measures specified within the erosion and sediment control plan. <p>Methods may include preservation of existing vegetation or use of geomats, straw wattles, straw bale barriers, or silt fencing, which would be placed at construction boundaries. Gravel ramps may be installed at access points to public roadways to prevent or minimize the tracking of mud, dirt, sediment, or similar materials onto the roadway. Selection of appropriate erosion control materials will be based on soil properties, steepness of the slope, and anticipated surface flow or runoff.</p> <p>Diesel fuel, gasoline, oil, and other lubricants, as well as adhesives and sealants, would be utilized during the construction of the transmission line and substation. Bulk quantities may be stored in the designated construction yard/staging area. Vehicle fueling and maintenance activities would be restricted to staging areas or approved areas away from drainage channels and sensitive habitats. All construction vehicles would be monitored for leaks and receive regular off-site preventive maintenance to reduce the chance of leakage.</p>	<p>PacifiCorp to prepare and implement a SWPPP, as defined.</p> <p>PacifiCorp to update the SWPPP during construction, as defined.</p>	<p>PacifiCorp to provide a copy of the SWPPP and of Receipt of the Letter of Intent, including the project's Waste Discharge ID Number, to CPUC prior to construction.</p> <p>CPUC to inspect periodically to ensure that plan requirements are being implemented.</p>	<p>Prior to and during construction.</p>	<p>SWPPP submitted to CPUC 5/8/20, and NOI with WDID provided 02/23/21 to CPUC.</p>

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APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions	Applicable/ Pre-Construction Requirements Met
	A copy of the SWPPP and of Receipt of the Letter of Intent, including the project's Waste Discharge ID Number, will be provided to the California Public Utilities Commission prior to construction to certify compliance with Order 2009-0009-DWQ Construction General Permit. The SWPPP will be updated during construction as required by the State Water Resources Control Board.				
APM-WQ-2	Restoration. To reduce visual contrast and siltation in construction where ground disturbance is substantial, surface preparation and reseeding shall occur during the last phase of construction. The method of restoration would normally consist of loosening the soil surface, reseeding, installing cross drains for erosion control, placing water bars in the road, and filling ditches. These actions shall occur in areas of exposed soils large enough that, if they remain unremediated once construction is completed, they could exceed water quality objectives of receiving waters (e.g., for sediment, turbidity, temperature, and dissolved oxygen) set forth in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins.	PacifiCorp to restore disturbed areas to minimize impacts to water quality, as defined.	PacifiCorp to provide documentation to CPUC showing compliance with this measure.	During and after construction.	
APM-WQ-3	Pole Placement Minimization/Avoidance: To minimize the amount of sensitive features disturbed in designated areas, poles would be placed so as to avoid sensitive features and/or to allow conductors to clearly span the features, within limits of standard pole design. If the sensitive features cannot be completely avoided, poles would be placed so as to minimize the disturbance.	PacifiCorp to avoid pole placement in designated sensitive areas or minimize disturbance in designated sensitive areas.	PacifiCorp to provide documentation to CPUC of avoidance or minimization measures implemented.	During construction.	See conditions in NTP-2.
MM-WQ-1	If necessary, Proper Management of Dewatering Discharges: Prior to excavation of foundations or horizontal directional drilling pits, or other activity requiring groundwater dewatering, PacifiCorp shall submit a Notice of Intent to the Central Valley Regional Water Quality Control Board (CVRWQCB) for the General Order for Dewatering and Other Low-Threat Discharges to Surface Waters (CVRWQCB Order R5-2013-0074, as amended). PacifiCorp shall describe the activity with sufficient detail to demonstrate the nature, location, and duration of the discharge. PacifiCorp shall send a sample of the groundwater to be discharged to a certified laboratory for analysis of priority pollutants, found in Attachment B of the General Order. If screening levels are exceeded, PacifiCorp shall implement appropriate treatment of the groundwater prior to discharge off site. Dewatering discharges shall comply with the discharge prohibitions, effluent limitations, and receiving water limitations outlined in CVRWQCB Order R5-2013-0074, and in no case shall the discharge impair beneficial uses, violate water quality standards, or cause a possible nuisance condition.	Prior to excavations, PacifiCorp to submit Notice of Intent to the CVRWQCB, as defined. PacifiCorp to implement water treatment requirements, as defined, and as necessary.	PacifiCorp to provide a copy of the Notice of Intent to CPUC, if required to submit to the CVRWQCB. CPUC to inspect periodically to ensure that water treatment requirements are being implemented, as necessary.	Prior to and during construction.	See APM-WQ-1.
<i>Transportation and Traffic</i>					
APM-TT-1	Traffic Management Plan: Prior to the start of construction, PacifiCorp shall prepare a Traffic Management Plan. The Plan would define the use of flag persons, warning signs, lights, barricades, cones, etc. to control construction traffic. The Plan would include but not be limited to the following:	PacifiCorp to prepare and implement a Traffic Management Plan, as defined.	PacifiCorp to provide a copy of the Traffic Management Plan to CPUC.	Prior to and during construction.	Copy of Traffic Control Plan submitted to CPUC on 06/08/22.

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APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions	Applicable/ Pre-Construction Requirements Met
	<ul style="list-style-type: none"> ● All property owners and residents of streets affected by construction shall be notified prior to the start of construction. Advance public notification shall include postings of notices and appropriate signage of construction activity. Access to all residences and properties near the project shall be maintained at all times. ● All construction activities shall be coordinated with local law enforcement and fire protection agencies. Emergency service providers shall be notified of the timing, location, and duration of construction activities. ● Road use-related wear and tear shall be documented during construction of transmission line facilities and PacifiCorp shall repair any damaged roadway sections, as applicable. 	<p>PacifiCorp to notify the public and affected residents/owners, as defined.</p> <p>PacifiCorp to coordinate with and notify local law enforcement, fire agencies, and emergency service providers, as defined.</p> <p>PacifiCorp to document road use and wear and repair damage, as necessary.</p>	<p>PacifiCorp to provide documentation of public/resident/owner notification to CPUC.</p> <p>PacifiCorp to provide documentation of coordination with local law enforcement, fire agencies, and emergency service providers to CPUC.</p> <p>PacifiCorp to provide road damage and repair documentation to CPUC.</p> <p>CPUC to periodically inspect to ensure that plan requirements are being implemented.</p>		