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**PACIFICORP  
LASSEN SUBSTATION PROJECT  
MITIGATION MONITORING, COMPLIANCE,  
AND REPORTING PROGRAM**

*Prepared for:*

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

*Prepared by:*

**DUDEK**  
605 Third Street  
Encinitas, California 92024

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## TABLE OF CONTENTS

<b><u>SECTION</u></b>	<b><u>PAGE NO.</u></b>
<b>ACRONYMS AND ABBREVIATIONS.....</b>	<b>III</b>
<b>1 INTRODUCTION.....</b>	<b>1</b>
1.1 Authority and Purpose of the Program .....	1
1.2 Program Adoption Process .....	2
1.3 Project Description.....	2
1.4 Agency Jurisdiction .....	3
<b>2 ROLES AND RESPONSIBILITIES.....</b>	<b>5</b>
2.1 Organization Overview .....	5
2.2 Responsibilities .....	9
2.3 Communication.....	11
<b>3 ENVIRONMENTAL COMPLIANCE AND FIELD PROCEDURES.....</b>	<b>15</b>
3.1 Applicant Proposed Measure and Mitigation Measure Compliance and Reporting .....	15
3.2 Minor Project Refinements .....	20
3.3 Records Management.....	21
3.4 Public Access to Records.....	21
<b>4 MITIGATION MONITORING PROGRAM TABLE.....</b>	<b>23</b>
4.1 Using the Table.....	23
4.2 Effectiveness Review .....	23
4.3 Applicant Proposed Measures and Mitigation Measures.....	23
<b>5 REFERENCES.....</b>	<b>43</b>

## TABLES

1	Estimated Construction Schedule .....	3
2	Required Permits and Approvals for the Lassen Substation Project .....	4
3	Applicant Proposed Measures and Mitigation Measures.....	24

## ATTACHMENTS

A	Project Component Overview
B	Project Contact List
C	Sample Site Inspection Form
D	Minor Project Refinement Request Form

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## **ACRONYMS AND ABBREVIATIONS**

<b>Acronym/Abbreviation</b>	<b>Definition</b>
APM	applicant proposed measure
CPUC	California Public Utilities Commission
CVRWQCB	Central Valley Regional Water Quality Control Board
EM	environmental monitor
EPM	Environmental Project Manager
kV	kilovolt
LEI	lead environmental inspector
MM	mitigation measure
MMCRP	mitigation monitoring, compliance, and reporting program
NCR	noncompliance report
NTP	Notice to Proceed
PM	Project Manager
SWPPP	stormwater pollution prevention plan

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## **1 INTRODUCTION**

This chapter outlines the mitigation monitoring, compliance, and reporting program (MMCRP) to ensure effective implementation of the applicant proposed measures (APMs) and mitigation measures required by the California Public Utilities Commission (CPUC) Permit to Construct.

The *Final Initial Study and Mitigated Negative Declaration for the PacifiCorp Lassen Substation Project (Application No. A.15-11-005)* (Final MND; CPUC 2017) includes procedures for preparing and implementing an MMCRP to ensure compliance with APMs and mitigation measures approved in the Final MND. These measures were adopted in CPUC Decision 19-04-011 on April 25, 2019. This MMCRP includes the information provided in Section G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), as well as specific protocols to be followed prior to and during construction by CPUC third-party environmental monitors (CPUC EMs) and PacifiCorp project staff.

The Lassen Substation Project's (project's) MMCRP includes direct participation and commitment from PacifiCorp and CPUC EMs. The success of the program depends on the project management staff, monitors, and construction contractor personnel. Therefore, the goal of the MMCRP is to provide a clear understanding of the project's organization, establish lines of communication, and effectively document and report compliance with all of the APMs and mitigation measures.

The MMCRP was developed to provide guidelines and standardize procedures for environmental compliance on the project. The procedures have been developed in coordination with PacifiCorp, CPUC, and CPUC EMs to help define the reporting relationships, provide detailed information about the roles and responsibilities of the project's environmental compliance team members, define compliance reporting procedures, and establish a communication protocol.

### **1.1 Authority and Purpose of the Program**

The California Public Utilities Code confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures and/or APMs stipulated as conditions of approval are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the California Public Resources Code. Section 21081.6 requires a public agency to adopt a Mitigation Monitoring, Compliance, and Reporting Program when it approves a project that is subject to preparation of a Final MND. CEQA Guidelines, Section 15097, was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting (14 CCR 15097). CPUC views the MMCRP as a working guide to facilitate not only the implementation of APMs and mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

## **1.2 Program Adoption Process**

APMs and mitigation measures for resource areas can be found in each resource section (Sections 5.1 through 5.18) of the Final MND (Dudek 2017), and in Section 4.3, Applicant Proposed Measures and Mitigation Measures, of this MMCRP. A draft version of the MMCRP was distributed to PacifiCorp, CPUC, and CPUC EMs for review and comment.

## **1.3 Project Description**

### **1.3.1 Project Overview**

The following are key components of the proposed project:

- Construction of Lassen Substation, which would be built on parcels adjacent to the existing Mount Shasta Substation, located at 504 South Old Stage Road, Siskiyou County, California.
- Replacement of 36 transmission poles along a 1.5-mile segment of the existing 69 kilovolt (kV) power transmission system with wood-framed poles to comply with current California regulations. The system would initially operate at 69 kV, but would be built to allow future operation at 115 kV.
- Connection of the existing transmission lines to the proposed substation. Connection of the new Lassen Substation to the existing distribution system.
- Construct one new distribution line and reconductor two existing distribution lines, which would include the partial reconductoring of the existing 4.16 kV distribution system to 12.5 kV, and the undergrounding of approximately 1,200 feet of the existing overhead distribution line.
- Addition of three banks of 12.5 kV to 4.16 kV stepdown transformers to be added on the 12.5 kV distribution feeders near the existing 4.16 kV load.
- Removal of the existing aboveground Mount Shasta Substation facilities. The site's fence would remain, as well as the gravel base, and it will continue to be used for material storage on a temporary basis as future project needs require.

Project construction is expected to require approximately 12 months to complete.

### **Schedule**

Project-related construction activities will not begin until pre-construction APMs and mitigation measure submittals have been satisfied. Once pre-construction APMs and mitigation measures have been completed, the CPUC will issue a Notice to Proceed (NTP), indicating that construction can commence. The NTP may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. Section 4.3 of this MMCRP lists the APMs and mitigation measures, the timing for completion, and whether CPUC review or approval

is required before construction can commence. A map of the construction elements is provided in Attachment A. Table 1 shows the estimated construction schedule by activity.

**Table 1  
Estimated Construction Schedule**

Duration (Months)	Project Activity
1.5 months	Clear, grub, and grade new substation location
2.5 months	Construct new substation
5 months	Construct transmission and distribution line modifications
1 month	Demolish existing Mount Shasta Substation

Source: PacifiCorp 2016.

### **1.3.2 Construction Components**

The APMs and mitigation measures listed in Section 4.3 of this MMCRP include the location and project component(s) in which the APM or mitigation measure applies. In general, the APMs and mitigation measures are applicable to all project components; however, certain biological protection measures are component specific. PacifiCorp will work closely with contractor staff to ensure that site-specific APMs and mitigation measures are clearly identified.

### **1.3.3 Project Documents**

This document is intended to provide pertinent information necessary to successfully implement the MMCRP during construction. The APMs and mitigation measures listed in Section 4.3 of this MMCRP can be found in the Final MND’s Project Description and at the end of each issue area of the Final MND (CPUC 2017). Detailed discussions on the intent of each APM and mitigation measure and potential impacts that could result if the APMs and mitigation measures are not implemented properly are provided in Section 4.3 of this document. Construction activities must be conducted in accordance with the requirements stipulated in the following documents, as well as in the Final MND:

- California Department of Transportation (Caltrans) Encroachment Permit conditions

## **1.4 Agency Jurisdiction**

CPUC, as the lead agency, is responsible for ensuring that permit conditions imposed by jurisdictional agencies are implemented throughout construction. However, jurisdictional agencies may visit the project site from time to time and request information regarding the status of permit conditions. PacifiCorp is responsible for satisfying requests from jurisdictional agencies and will notify and copy CPUC on all correspondence related to final approvals and verifications for the



**PacifiCorp Lassen Substation Project  
Mitigation Monitoring, Compliance, and Reporting Program**

project if CPUC is not otherwise copied on the correspondence. Additional information on communication protocols can be found in Section 2.3, Communication, of this MMCRP. Table 2 lists permits and jurisdictional agencies associated with the project.

**Table 2  
Required Permits and Approvals for the Lassen Substation Project**

Permits	Accepting Authority/ Approving Agency	Statutory Reference
<i>Federal</i>		
Clean Water Act 404 Preconstruction Notification	U.S. Army Corps of Engineers	Clean Water Act, Section 404; 33 CFR 320–330
Permit to cross Federal-Aid Highway	Federal Highway Administration	23 CFR 1.23 and 1.27; 23 CFR 645, Subpart B; 23 CFR 77
<i>State of California</i>		
Permit to Construct	CPUC	CEQA, California Public Resources Code Section 21000 et seq., and California Public Utilities Code Section 1001
Encroachment Permit	California Department of Transportation, District 2 – Redding	California Streets and Highways Code, Section 671.5(a)
Streambed Alteration Program – Notification	California Department of Fish and Wildlife, Northern Region (Region 1)	California Fish and Game Code, Sections 1602 and 1603
Section 401 CWA Water Quality Certification	State Water Resources Control Board – California Water Quality Control Board for Central Valley, Region 5 (Redding Office)	Federal Clean Water Act, Section 401
State Waste Discharge Requirements – obtained as part of the 401 Water Quality Certification	State Water Resources Control Board – California Water Quality Control Board for Central Valley, Region 5 (Redding Office)	Porter-Cologne Water Quality Control Act
General Discharge Permits for Storm Water Associated with Construction Activity	State Water Resources Control Board – S.M.A.R.T.S. Database	Federal Clean Water Act, Section 402

CPUC = California Public Utilities Commission; CEQA = California Environmental Quality Act; ROW = right-of-way.

## **2 ROLES AND RESPONSIBILITIES**

This chapter describes the roles and responsibilities of key project personnel with respect to the MMCRP and identifies project members responsible for implementing the MMCRP and their relationship to other staff working on the project. The information in this chapter and in Attachment B also establishes preliminary lines of communication within the project team.

### **2.1 Organization Overview**

#### **2.1.1 PacifiCorp**

##### **PacifiCorp Project Manager**

PacifiCorp's Project Manager (PM), referenced in the project contact list (Attachment B), will provide the overall direction, management, leadership, and corporate coordination for the construction project. The PacifiCorp PM has overall responsibility for all aspects of project implementation and will ensure all environmental and permit-related compliance for the project. The responsibilities of the PacifiCorp PM related to the environmental program include, but are not limited to, the following:

- Coordinating between financial, safety, public affairs, construction, engineering, land services, and environmental staff
- Providing direction by integrating environmental compliance into all levels of the project organization
- Communicating corporate coordination for all levels of the project organization
- Ensuring financial support and effective corporate leadership and management of staff to comply with all project policies, requirements, and procedures
- Ensuring compliance with project specifications, drawings, permit conditions, construction contracts, and applicable codes
- Notifying Environmental Project Manager (EPM) of project schedule changes
- Working with PacifiCorp Environmental Project Management Team to evaluate and improve the implementation of the MMCRP as construction progresses
- Providing leadership for the engineering, procurement, and construction services by integrating environmental responsibility into the project organization
- Regularly facilitating project meetings

##### **PacifiCorp Construction Manager and Construction Personnel**

Construction activity may take place at any given time within multiple construction components. Construction contractors will have significant responsibilities for implementation of and compliance

with the environmental requirements of the project. The PacifiCorp Construction Manager (CM), referenced in the contact list (Attachment B), will oversee the day-to-day construction activities conducted by PacifiCorp's construction contractors. The construction contractor will be responsible for incorporating all project environmental requirements into their day-to-day construction activities. Key environmental responsibilities for contractor's staff include, but are not limited to:

- Verifying that all construction workers attend the project's environmental awareness training prior to beginning work on the project
- Reviewing and understanding the environmental requirements
- Implementing and maintaining APM and mitigation measure requirements and conditions during construction
- Responding to requests by PacifiCorp resource leads and EMs during construction

#### **PacifiCorp Environmental Project Manager and Compliance Lead**

PacifiCorp's EPM, referenced in the project contact list (Attachment B), is responsible for providing the appropriate level of resources for successful implementation of the MMCRP and will provide oversight of all activities required for compliance with the MMCRP. The EPM will provide management, direction, and leadership to the PacifiCorp Environmental Project Management Team. Specific responsibilities of the EPM include, but are not limited to:

- Directing the development and implementation of the pre-construction environmental planning, permitting, and compliance activities
- Ensuring the development and implementation of environmental awareness training
- Ensuring all construction personnel receive environmental awareness training
- Providing the leadership and resources to ensure compliance with the MMCRP
- Actively communicating with the lead agencies, particularly in regard to the MMCRP
- Ensuring frequent and clear communication between PacifiCorp environmental staff, construction personnel, responsible resource agencies, and EMs
- Establishing and supporting the lines of communication between the PacifiCorp environmental staff, construction personnel, agencies, and EMs
- Submitting weekly compliance reports to CPUC
- Coordinating and tracking MMCRP compliance, including the submittal weekly and biweekly compliance reports and pre-construction submittals in order to receive NTPs
- Reviewing and approving daily inspection reports

- Preparing Minor Project Refinement Request Forms or assisting PacifiCorp contractors with preparation of the requests.
- Coordinating the activities of the aesthetics, air quality, biological, cultural, greenhouse gas, hazards, water, land use, traffic, utilities, and noise APM and mitigation measure requirements, including environmental monitoring
- Coordinating the development and implementation of the pre-construction environmental planning, permitting, and compliance activities
- Actively communicating with all agencies respective to the above APM and mitigation measure requirements
- Submitting summary reports to responsible resource agencies, as identified in mitigation or other applicable regulation

### **PacifiCorp Lead Environmental Inspector**

PacifiCorp's lead environmental inspector (LEI), referenced in the project contact list (Attachment B), will support the EPM for successful day-to-day field implementation of the MMCRP. The LEI's responsibilities include, but are not limited to, the following:

- Coordinating with CPUC EMs as appropriate
- Coordinating the mobilization of other resource specialists, including biological and stormwater pollution prevention plan (SWPPP) specialists, as required
- Conducting daily inspections of construction activities and reports
- Coordinating the assessment of work area conditions ahead of construction and providing advance notice of conditions and situations that require specific awareness, planning, or notifications
- Working closely with the EPM, CM, and CPUC EMs to evaluate the effectiveness of APMs and mitigation measures
- Providing coordination with the CM and construction and engineering groups to ensure APMs and mitigation measures are understood and implemented
- Providing and documenting environmental awareness training for project personnel
- Assisting the EMP with the preparation of Minor Project Refinement Request Forms

### **PacifiCorp Specialty Environmental Monitors**

Several APMs and mitigation measures require a qualified specialty monitor during construction or in the event of cultural resource discoveries, as presented in Section 4.3 of this MMCRP. PacifiCorp

is to provide an on-site specialty monitor to meet the conditions of the APMs and mitigation measures identified in Section 4.3.

Contact information for all specialty EMs will be made available as consultant and contract personnel are finalized. The specialty EMs will provide oversight, protection, and direction for compliance within their field of expertise for the applicable construction components.

### ***APM and Mitigation Measure Compliance***

PacifiCorp is responsible for successfully implementing all APMs and mitigation measures in the MMCRP. The MMCRP contains criteria that define whether measures are successful. Standards for successful mitigation also are implicit in many APMs and mitigation measures that include such requirements as obtaining nondiscretionary permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the discretionary permit process.

## **2.1.2 California Public Utilities Commission**

### **CPUC Project Manager**

The CPUC PM (see Attachment B, Project Contact List) has the overall responsibility for ensuring that APMs and mitigation measures are implemented as adopted by CPUC. He will determine the effectiveness of the MMCRP based on the success criteria included in the mitigation monitoring program tables. CPUC delegates field monitoring and reporting responsibilities to Dudek. The CPUC PM will oversee Dudek's work through telephone calls and review of compliance status reports. The CPUC PM will be notified of all noncompliance situations immediately by telephone call or email and may suggest measures to help resolve the issue(s). All Minor Project Refinement Request Forms will be submitted to the CPUC PM for review and approval.

The CPUC PM will issue an NTP for construction. In the event the NTP covers other jurisdictional lands, CPUC's NTP does not authorize construction to start, but only documents compliance with all relevant APMs, mitigation measures, and permit conditions. No construction may occur on other jurisdictional lands without specific approval (i.e., issuance of permits) by those agencies.

### **CPUC Environmental Monitors**

The overall monitoring program will be administered under the direction and oversight of the CPUC PM. CPUC has delegated monitoring and reporting responsibilities to Dudek, a third-party monitoring firm. Individual roles are defined in Attachment B, Project Contact List. The number of CPUC EMs and frequency of site inspections will depend on the number of concurrent

construction activities and their locations with respect to sensitive resources and land uses, and compliance with project APMs, mitigation measures, and permit conditions during construction.

The PacifiCorp EPM has primary responsibility for ensuring that construction activities are conducted in accordance with approved project APMs, and mitigation measures, compliance plans, and permit conditions. The role of the CPUC EMs (Dudek) is to ensure and document that compliance is being achieved using verbal and written communications.

- **Dudek Monitoring Manager.** The monitoring manager supervises Dudek’s EMs, as well as determining the appropriate level of inspection frequency, and is responsible for report preparation. The monitoring manager also serves as the main point of contact with the CPUC PM for major issues and noncompliance discussions.
- **CPUC Environmental Monitors.** CPUC EMs will be an integral part of the project team and will stay apprised of construction activities and schedule changes, and will monitor construction activities for compliance with project APMs and mitigation measures, compliance plans, and permit conditions. The CPUC EMs will document compliance through maintaining logs and using an APM and mitigation measure tracking table. The CPUC EMs will also provide input for the draft reports. The CPUC EMs will note problems with monitoring, notify designated project members, and report the problems to the CPUC PM. The enforcement and shut-down authority of the CPUC EMs in the field is limited to issues that address imminent danger to resources. All other issues will be brought to the attention of the PacifiCorp EPM, to address appropriately.

### **2.1.3 Mitigation Monitoring Program Contact List**

A project contact list has been included as Attachment B. The contact list includes the names of PacifiCorp monitoring staff, the CPUC EMs, PMs, supervisory staff, and other members of the project team. The list also includes phone numbers, cell phone numbers, and email addresses where project members can be reached during construction. The contact list will be updated periodically and redistributed to the project team.

## **2.2 Responsibilities**

### **2.2.1 Monitoring**

As the lead agency under CEQA, CPUC is required to monitor this project to ensure that the required APMs and mitigation measures are implemented. CPUC will be responsible for ensuring full compliance with the provisions of this monitoring program and has primary responsibility for implementation of the monitoring program. As mentioned in Section 2.1.2, California Public Utilities Commission, CPUC has delegated monitoring responsibilities to a third-party monitoring firm. The CPUC EMs will be in the field on a regular basis, particularly when construction

activities have the potential to impact a sensitive resource. Responsible agencies, such as the U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, and Regional Water Quality Control Board, may elect to monitor construction or conduct a site visit during construction.

PacifiCorp may elect to have one or more full-time EMs on site on a daily basis to coordinate specialty monitors and assist construction crews with interpreting APMs and mitigation measures and correcting compliance problems in a timely manner. EMs would also provide worker environmental awareness training, as required under APM-BIO-8 (see Section 4.3), as new workers arrive on the project.

### **2.2.2 Enforcement**

CPUC and other jurisdictional agencies are responsible for enforcing the procedures adopted for monitoring through the CPUC EMs assigned to each project component.

Per Resolution E-4550 (May 9, 2013), CPUC may impose fines in the event PacifiCorp does not comply with APMs and mitigation measures. CPUC staff will determine whether a fine is appropriate for noncompliance events consistent with Resolution E-4550. Examples of noncompliance 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 through an NTP
- Violating nest buffer zones
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance
- Grading, line work, or other ground disturbance without required biological pre-construction surveys or biological monitor on site
- Use of new access roads, overland travel routes, staging areas, or extra workspaces that have not been approved
- Failure to properly maintain an erosion or sediment control structure
- Working outside of approved work hours
- Project personnel working without training

Other jurisdictional agencies have the independent authority to halt construction, operation, or maintenance activities associated with the project within their respective jurisdictions if the

activities are determined to be a deviation from the approved project or adopted APMs and mitigation measures or put a sensitive resource at undue risk.

### **2.2.3 Mitigation Compliance**

PacifiCorp is responsible for successfully implementing all the APMs and mitigation measures in the MMCRP. Standards for successful mitigation also are implicit in many APMs and mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the permit process.

PacifiCorp shall inform CPUC and its monitors in writing of any APMs and mitigation measures that are not or cannot be successfully implemented. CPUC, in coordination with its monitors, will assess whether alternative mitigation is appropriate and specify to PacifiCorp the subsequent actions required.

## **2.3 Communication**

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible shut-downs, environmental and construction representatives will need to interact regularly and maintain professional, responsive communications at all times. Similarly, PacifiCorp representatives will need to coordinate closely with CPUC EMs to address and resolve issues in a timely manner. Therefore, this section of the MMCRP provides a communication protocol to accurately disseminate information about ongoing surveys and APMs, mitigation measures, construction activities, contractors, and planned or upcoming work to all levels of the project team.

### **2.3.1 Pre-Construction Kickoff Meeting**

A pre-construction meeting will be held with CPUC, PacifiCorp, and CPUC EMs to review the MMCRP and mutually agree on the project's communication protocol. Based on discussion at the meeting and input from each party, Chapter 2 of this document will be finalized and incorporated into the MMCRP.

### **2.3.2 Construction Progress Meetings**

PacifiCorp will conduct field meetings with construction managers, contract administrators, contractor supervisors, and PacifiCorp's environmental representatives to discuss work completed, work anticipated for the following period, and the status of APMs and mitigation measures. The field meetings will also be a forum for discussing environmental compliance issues or concerns with the construction contractors. PacifiCorp may request CPUC's EM(s) to participate in the meeting to help resolve any issue that may have arisen during the previous period. Alternatively, PacifiCorp or



CPUC's EM(s) may recommend a separate meeting to discuss APMs, mitigation measures, minor project refinement requests, or other project-related issues.

In addition to construction progress meetings conducted at the field level, the PacifiCorp PM, PacifiCorp CM, PacifiCorp EPM, and the CPUC lead EM and/or CPUC PM may participate in a teleconference calls. The teleconference calls would be similar to construction progress meetings; however, the conference calls would focus on the MMCRP.

### **2.3.3 Daily Communication**

Many of the problems that come up during construction can be resolved in the field through regular communication between CPUC EMs, PacifiCorp, and construction contractors. Field staff will be equipped with cell phones and available to receive phone calls at all times during construction. A project contact list has been included in Attachment B. The following subsections provide additional guidelines to ensure effective communication in the field.

#### **CPUC EMs**

The CPUC EMs' primary point of contact in the field is PacifiCorp's PM. The CPUC EMs will contact PacifiCorp's PM if an activity is observed that conflicts with one or more of the APMs or mitigation measures, so that the situation can be corrected. If the CPUC EMs cannot immediately reach PacifiCorp's PM, then the PacifiCorp EPM will be contacted to address the problem. Similarly, the CPUC EMs will contact PacifiCorp's PM for information on where construction crews are working, the status of APMs and mitigation measures, and schedule forecasts. The CPUC EMs will not direct the contractor; however, the EMs have the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly clearing vegetation in an exclusion area).

#### **PacifiCorp**

PacifiCorp will provide the CPUC EMs with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title, responsibility, and whether their position is segment specific. The contact list will be updated as new personnel are assigned to the project and redistributed as necessary.

PacifiCorp will prepare and distribute a weekly construction status and MMCRP compliance report (weekly report) to key project members, including CPUC. The weekly environmental compliance status reports may be reduced to bi-weekly if construction activities warrant a reduction and is approved by the CPUC PM. The CPUC PM will review the report to ensure that the status of APMs and mitigation measures is consistent with observations in the field. Any questions regarding the status of APMs and mitigation measures will be directed to the

PacifiCorp field representative. The environmental compliance status report will also be a tool to keep all parties informed of construction progress and schedule changes.

#### **2.3.4 Communicating Compliance Issues**

Section 3.1.4, Compliance Levels, describes procedures to communicate issues/concerns with implementation of mitigation identified by the CPUC EMs during site inspections.

#### **2.3.5 Coordination with Other Agencies**

As discussed in Section 1.4, Agency Jurisdiction, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, some of the APMs and mitigation measures were derived from specific permit conditions or agency input. PacifiCorp will be responsible for contacting resource agencies and immediately notifying them of issues regarding their jurisdiction. The CPUC EMs may request copies of email correspondence, phone logs, or other documentation between PacifiCorp and resource agencies to avoid direct involvement from CPUC EMs. However, if there is an unresolved issue regarding compliance with an APM, mitigation measure, or permit requirement under the jurisdiction of a resource agency, the CPUC EMs may elect to contact the agency to discuss resolution. The CPUC EMs will coordinate this call with PacifiCorp and provide the opportunity to participate in the call.

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### **3 ENVIRONMENTAL COMPLIANCE AND FIELD PROCEDURES**

#### **3.1 Applicant Proposed Measure and Mitigation Measure Compliance and Reporting**

##### **3.1.1 Pre-Construction Compliance Verification**

PacifiCorp is required by the terms of the APMs and mitigation measures and 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. Copies of this documentation will be retained by the CPUC EMs and provided to CPUC with all files at the completion of the project. The plans, surveys, studies, and other documentation required to be completed by PacifiCorp before construction are listed in the APM and mitigation measure table in Section 4.3.

While these documents are being reviewed by the approving agencies, they are also reviewed by CPUC. Compliance with all pre-construction APMs and mitigation measures presented will be verified prior to construction, and construction may not start on any segment before PacifiCorp receives a written NTP from the CPUC PM.

The CPUC EMs, including project management staff and the technical experts, will review all mitigation plans and reports and provide comments. Resource agencies will also be involved in the review of applicable plans and reports, primarily restoration related, and will provide comments. Comments on these documents will be provided to PacifiCorp to ensure that they adequately accomplish the intended reduction in impacts. For required local and state agency permitting/consultations, the CPUC EMs will track PacifiCorp's progress as it relates to PacifiCorp's construction plans and project mitigation and permitting requirements. Based on PacifiCorp's construction plans, CPUC may authorize construction to begin on a phased basis, and the CPUC EMs will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance for that phase is satisfactorily accomplished.

CPUC will not authorize construction to begin until all pre-construction requirements for a given phase have been fulfilled. To save time, PacifiCorp should identify extra workspace required for each phase of construction prior to the start of active construction, so that the locations and their use can be included in the NTP.

##### **3.1.2 Notice to Proceed Procedures**

The CPUC PM and Dudek will ensure that the NTP process is consistent with the adopted CEQA document. The NTP approval shall document that pre-construction APM and mitigation measure requirements, applicable surveys and studies, and project permit requirements have been met.

In general, an NTP request must include the following information:

- A description of the work
- Detailed description of the location, including maps, photos, and/or other supporting documents
- Verification that all APMs and mitigation measures have been met or do not apply to the work covered by the NTP request
- Verification that all applicable permit conditions or requirements, project parameters, or other project stipulations have been met for the work covered by the NTP request
- A request outlining what submittals are outstanding and how they will be met and approved in a timely manner prior to construction (if some outstanding compliance items cannot be met prior to issuance of the NTP)
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction
- Cultural resource surveys or verification that no cultural resources would be significantly impacted
- All applicable jurisdictional permits or agency approvals (if necessary)
- Date of expected construction and duration of work

CPUC will review the NTP request and pre-construction requirement submittals per the steps outlined below to ensure that all information required to process the approval is included:

1. PacifiCorp submits the NTP to the CPUC PM. CPUC will distribute the NTP request for review as follows:
  - a. To the team biological resources expert for review for biological resources. Review questions/comments will be provided in a letter or email.
  - b. To the team cultural resources expert for review of cultural resources. Review questions/comments will be provided in a letter or email.
  - c. The remaining portions of the NTP request will be sent to issue-area reviewers where appropriate.
2. CPUC will also review and, if needed, will prepare a bullet list of outstanding requirements and where additional information or clarification is needed.
3. All questions and comments, as well as required additional information or clarifications, will be sent to PacifiCorp by CPUC in an email.

4. PacifiCorp will supply clarifications and/or additional information to be added to the NTP request in a memo or letter format along with responses addressing all comments and questions forwarded by CPUC.
5. CPUC will complete a compliance status table documenting compliance and any outstanding requirements that can be made conditions of the NTP.
6. CPUC will review the draft NTP approval letter and send the approval and an updated compliance table to PacifiCorp.
7. CPUC will then post the approved NTP documentation on the public CPUC project website.

### **3.1.3 Compliance Reporting**

As described in Chapter 2, Roles and Responsibilities, the CPUC EMs will perform compliance inspection throughout the construction period to ensure compliance with all applicable APMs, mitigation measures, plans, permits, and conditions of approval of CPUC. Site visits may be coordinated with PacifiCorp or conducted unannounced. Supplemental information provided by PacifiCorp, including pre-construction submittals, survey reports, weekly reports, meeting notes, and agency correspondence, will also be used to verify compliance.

The CPUC EMs will document observations on site through the use of field notes and digital photography. The photos will be included in the compliance reports and correlate to a discussion of specific construction or compliance activity. In addition, field inspection forms will be used in the field to document compliance of specific crews, construction activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as listing APMs and mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate compliance status reports and update the status of APMs and mitigation measures listed in Section 4.3. A sample site inspection form has been included in Attachment C. Reports will be provided to all permitting agencies via email and/or posted on a CPUC public website during construction.

Separate enforcement actions by the regulatory agencies may not follow these steps.

### **3.1.4 Compliance Levels**

The CPUC EMs and PacifiCorp LEI shall document all observations and communications in a logbook and will determine whether the observed construction activities are consistent with APMs, mitigation measures, and project parameters, as adopted by CPUC. All compliance issues, regardless of level, will be documented in the compliance reports, which will be provided to all agencies upon request.

The CPUC EMs will not direct the work of a construction contractor or subcontractor. A construction activity that deviates from permit conditions, APMs, or mitigation measures, or occurs outside of approved work areas, particularly when the activity puts a resource at risk, would be considered a noncompliance issue. A noncompliance issue may also be reported by the PacifiCorp PM, PacifiCorp EPM, PacifiCorp LEI, and/or a CPUC EM if an APM or mitigation measure is not implemented according to the timing restrictions listed in the APM and mitigation measure table. Examples of noncompliance include, but are not limited to, the following:

- Use of new access roads, staging areas, or extra workspaces not identified on the project drawings or approved for use during construction
- Construction activity occurring in areas 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
- Activity during seasonal activity restrictions
- Grading, soil disturbance, or line work without required biological pre-construction surveys or a biological monitor on site
- Failure of erosion or sediment control structures if it puts a sensitive resource at risk
- Discharge of sediment-laden trench or foundation hole water into a water body or storm drain

PacifiCorp will immediately notify the CPUC EMs and the CPUC PM if any noncompliance events occur, verbally or through email. PacifiCorp will follow up with a detailed written report of the event within 24 hours or at a time agreed on with the CPUC PM. In the event the noncompliance is observed by a CPUC EM, the CPUC EM will immediately notify the designated PacifiCorp representative of a noncompliance issue that requires immediate corrective action. A noncompliance report (NCR) that outlines the incident will be sent to PacifiCorp from the CPUC PM. The NCR will list all actions required to bring the activity back into compliance and provide a timeline for follow-up. All NCRs and project memoranda will be made available upon request to agencies with resources that were potentially affected by activities reported in the NCR. If a construction activity or observed resource protection measure only slightly deviates from project requirements and does not put a resource at immediate risk, the CPUC EM and/or PacifiCorp PM may elect to issue a project memorandum to get the issue corrected. Construction activities that could result in a project memorandum include, but are not limited to, the following:

- Failure to properly maintain an erosion or sediment control structure, without structural failure occurring
- Use of an existing unapproved access road (first offense)

- Project personnel beginning work on site without proof of training
- Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot

Through the issuance of project memoranda and NCRs, patterns of compliance issues can be discerned, preventive measures can be developed, and remedial work, if needed, can be scheduled.

Incident reports (e.g., reportable spills) would also be tracked in the weekly reports. Repeated events that individually might not be considered noncompliance may become noncompliance if continued occurrences are observed and documented after the initial incident. In other words, repeated incidents will result in noncompliance.

### **Compliance and Noncompliance Violation Levels**

Project compliance and noncompliance violation levels and the specific corrective actions are defined below. The compliance and noncompliance violation levels should be used by both the PacifiCorp PM and CPUC EMs to document compliance levels throughout construction.

- **Level 0 Compliance.** This level indicates that all APMs, mitigation measures, and permit conditions are being complied with and there are no violations. No corrective action is necessary.
- **Level 1 Minor Deviation.** This level indicates that a minor deviation from an APM or mitigation measure has been identified and action is being taken in the field to immediately remedy the situation. No resources are being impacted and no potential for resource damage exists. If a minor deviation is not expeditiously corrected, it would become a Level 2 Noncompliance issue.
- **Level 2 Noncompliance.** One or more aspects of an APM or mitigation measure have not been complied with, making the mitigation ineffective and resulting in minor impacts. If allowed to continue, this noncompliance could result in a significant impact over time. Noncompliance may also include one or more of the aspects of an APM or mitigation measure not being complied with and the implementation of an APM or mitigation measure being deficient or nonexistent, resulting in significant impact(s), or immediate threat of major, irreversible environmental damage or property loss. The protocol outlined above for an NCR shall be completed in the event noncompliance is identified by a CPUC EM and/or the PacifiCorp EPM or LEI.

All noncompliance activity will be reported by Dudek and/or the PacifiCorp EPM or LEI to the CPUC PM via immediate notification or compliance reporting, depending on the severity of the noncompliance. Based on the severity or pattern of noncompliance activity, the CPUC PM has



the authority to shut down project construction activities. If a shutdown of construction activity occurs, construction shall not resume until the CPUC PM authorizes it to do so. No Dudek personnel have the authority to shut down or restart construction activities on a component- or project-wide scale. However, CPUC EMs have the authority to redirect work if an immediate threat to safety of a sensitive resource is imminent.

### **3.2 Minor Project Refinements**

The CPUC Energy Division may approve requests by PacifiCorp for minor project refinements that may be necessary to complete the project due to final engineering or other reasons. Minor project refinements cannot create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document. Minor project refinements cannot require new conditions for approval, without which the proposed refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact. Minor project refinements cannot conflict with any APM, mitigation measure, or applicable law or policy or trigger an additional permit requirement. Specifically, minor project refinements must not change APMs or mitigation measures. Minor project refinements must be located within the geographic boundary of the project study area of the Final MND. PacifiCorp shall seek any other project refinements by a petition to modify the decision.

Requests for staff approval of a project change must be made in writing and should include the following:

- A detailed description of the proposed refinements, including:
  - An explanation of how the project refinement would deviate from the current project (include photos)
  - The original condition as described and approved
  - Justification for change
  - Maps and figures
  - Environmental impacts
  - Concurrence with other relevant agencies
- Whether certain resources are present within the proposed refinement (e.g., biological or cultural resources), and whether those resources were included in original baseline surveys and/or previous analysis (also include more recent preconstruction surveys, if applicable)

- Identification of applicable CEQA sections and potential impacts of proposed refinements, including original and new levels of impact and avoidance/minimization measures to be taken

The CPUC PM may request additional information or a site visit in order to process the request. Possible examples of project refinements that may be approved by staff after final engineering include, but are not limited to:

- Adding a temporary extra work area (for the duration of construction) or substituting a work area, including laydown and staging, for another work area that is as suitable or more suitable than the originally proposed work area. The temporary extra work area or substitute work area must be located in a disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed work area, must not create any permanent impacts, and must be restored to either its initial condition or an improved condition.
- Adjusting the alignment of a project within the study area that was used in the original environmental analysis to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new impact or a substantial increase in the severity of a previously identified impact.
- Adjusting the alignment of a project within the study area that was used in the original environmental analysis to avoid 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 impact or a substantial increase in the severity of a previously identified impact.

To initiate a project refinement request, PacifiCorp will fill out a Minor Project Refinement Request Form (see Attachment D), prepare the appropriate supporting documentation, and obtain the required signatures. PacifiCorp will complete and submit the Minor Project Refinement Request Form and supporting documentation by email (scanned copy) to CPUC with a copy to Dudek.

### **3.3 Records Management**

Inspection and compliance status reports will be filed and used by CPUC's third-party EM firm to prepare a final environmental compliance report following the completion of construction. The final report will provide a discussion on how each APM and mitigation measure was implemented and include copies of submittals required for compliance. In addition, the success criteria will be evaluated and used for future projects.

### **3.4 Public Access to Records**

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

**PacifiCorp Lassen Substation Project  
Mitigation Monitoring, Compliance, and Reporting Program**

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In order to facilitate public awareness, CPUC will make compliance reports and other pertinent project documents accessible on their website at <http://www.cpuc.ca.gov/environment/info/dudek/LassenSub/PacifiCorpLassenSub.htm>.

## **4 MITIGATION MONITORING PROGRAM TABLE**

### **4.1 Using the Table**

Section 4.3 lists the APMs and mitigation measures included in the Final MND. The mitigation monitoring program table is the core document for environmental requirements on the project and will be the primary guideline for determining compliance with the MMCRP. A copy of the table should be kept with each crew working on site, and all supervisory staff working on the project should be familiar with its contents.

CPUC will use a modified version of the APM and mitigation measures table during the pre-construction planning and construction monitoring phases of the project to accurately track the status of APMs and mitigation measures. The tables will be sorted and divided into pre-construction measures and measures to be implemented during construction. Similarly, a separate table listing APMs and mitigation measures that require CPUC approval may be generated.

### **4.2 Effectiveness Review**

CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts at any time it deems appropriate. If in review CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, then CPUC may impose additional reasonable conditions to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with CPUC's rules and practices.

### **4.3 Applicant Proposed Measures and Mitigation Measures**

Table 3 provides the APMs and mitigation measures that compose the mitigation monitoring program, including implementation actions, monitoring requirements and effectiveness criteria, and timing and location of actions.

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
<i>Air Quality</i>				
<b>APM-AQ-1</b>	<p><b>Construction Pollutant Reduction Measures:</b></p> <p>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"> <li>• Minimize soil disturbance.</li> <li>• 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.</li> <li>• Curtail earthmoving activities on windy days.</li> <li>• Ensure that the engines of all construction equipment are properly tuned.</li> <li>• Limit the maximum speed to 15 miles per hour on unpaved surfaces.</li> <li>• Replant vegetation in disturbed areas as quickly as possible.</li> <li>• Implement other effective particulate matter control measures, as needed.</li> </ul> <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Use California Air Resources Board-certified construction equipment, where available.</li> <li>• Use alternative fuel types for construction equipment where feasible.</li> <li>• Use local building materials.</li> </ul>	<p>PacifiCorp to implement measure as defined and incorporate commitments into construction contracts.</p>	<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>	<p>Prior to and during construction.</p>

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<ul style="list-style-type: none"> <li>• Limit construction vehicle idling time.</li> </ul> <p>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Use California Air Resources Board-certified construction equipment, where available.</li> <li>• Use alternative fuel types for construction equipment where feasible.</li> <li>• Use local building materials.</li> <li>• Limit construction vehicle idling time.</li> </ul>			
<i>Biological Resources</i>				
<b>APM-BIO-1</b>	<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>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 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>Prior to construction.</p>

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<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. 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 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 (CNDDDB), 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 CNDDDB, as applicable.</p> <p>PacifiCorp to provide resume(s) of qualified bat biologist(s) to CPUC.</p>	
<b>APM-BIO-2</b>	<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</p>	<p>Prior to and during construction.</p>

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
			operations equipment washing requirements are being implemented.	
<b>APM-BIO-3</b>	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 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 prepare a revegetation plan, as defined.</p> <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>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>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>	Prior to, during, and after construction.
<b>APM-BIO-4</b>	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	PacifiCorp to avoid impacts to streambeds and stream banks or obtain an LSAA and implement identified	<p>PacifiCorp to provide a copy of the LSAA to CPUC, as applicable.</p> <p>PacifiCorp to provide documentation to CPUC of</p>	Prior to and during construction.



**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	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.	mitigation measures, as defined.  PacifiCorp to clearly mark or flag avoidance areas.	mitigation as outlined in the LSAA, as applicable.  CPUC to inspect periodically to ensure that construction activity is not occurring in avoidance areas.	
<b>APM BIO-5</b>	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.	PacifiCorp to use existing access roads, implement temporary access methods, and access when conditions are dry, as defined.  PacifiCorp to design access routes considering the project's wetland delineation, as defined.	PacifiCorp to provide CPUC a copy of access design.  CPUC to inspect periodically to ensure that impact avoidance measures are being implemented, as defined.	Prior to and during construction.
<b>APM BIO-6</b>	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	PacifiCorp to retain qualified environmental monitor(s) and implement measure as defined.  Monitors to clearly delineate and flag avoidance areas and monitor conditions during construction activities.	PacifiCorp to provide resumes of qualified environmental monitors to CPUC.  CPUC to inspect periodically to ensure that construction activity is not occurring in avoidance areas.	Prior to and during construction.

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	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.	Monitors to consult with USFWS and/or CDFW, as applicable.		
<b>APM BIO-7</b>	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	<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 CNDDB, 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.

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	recorded, and such observations shall be reported to the California Natural Diversity Database.			
<b>APM-BIO-8</b>	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.	PacifiCorp to provide a copy of worker environmental awareness training materials to CPUC.  PacifiCorp to provide documentation of personnel training in weekly compliance reports.	Prior to and during construction.
<b>APM-BIO-9</b>	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.	PacifiCorp to prepare an impact assessment study and bird observation surveys, as defined.  PacifiCorp to install line markers in accordance with defined standards.	PacifiCorp to provide to CPUC a copy of the impact assessment study and survey results.  PacifiCorp to provide documentation to CPUC of consultation with CDFW.  PacifiCorp to provide to CPUC engineer approval of identified line markers.	Prior to and during construction.
<b>APM-BIO-10</b>	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.

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
<b>APM-BIO-11</b>	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.
<b>APM-BIO-12</b>	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.
<b>APM-BIO-13</b>	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	PacifiCorp to implement measure during operations and	PacifiCorp to provide a copy of the Incidental Take Permit to CPUC, as applicable.	Prior to, during, and after construction.

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	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.	<p>maintenance period, as defined.</p> <p>PacifiCorp to obtain an Incidental Take Permit, as applicable.</p>		
<b>MM-BIO-1</b>	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 (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.	<p>PacifiCorp to prepare and implement a topsoil salvage and relocation plan, as defined.</p> <p>PacifiCorp to submit plan to CDFW for review and approval.</p>	<p>PacifiCorp to submit a copy of the plan and documentation of CDFW approval to CPUC.</p> <p>CPUC to inspect periodically to ensure that plan measures are being implemented.</p>	Prior to and during construction.
<i>Geology and Soils</i>				
<b>APM-GEO-1</b>	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.
<i>Greenhouse Gas Emissions</i>				
<b>APM-AQ-1</b>	<b>Construction Pollutant Reduction Measures:</b>	PacifiCorp to implement measure as defined and incorporate commitments	CPUC to ensure that commitments have been	Prior to and during construction.

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<p>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"> <li>• Minimize soil disturbance.</li> <li>• 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.</li> <li>• Curtail earthmoving activities on windy days.</li> <li>• Ensure that the engines of all construction equipment are properly tuned.</li> <li>• Limit the maximum speed to 15 miles per hour on unpaved surfaces.</li> <li>• Replant vegetation in disturbed areas as quickly as possible.</li> <li>• Implement other effective particulate matter control measures, as needed.</li> </ul> <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Use California Air Resources Board-certified construction equipment, where available.</li> <li>• Use alternative fuel types for construction equipment where feasible.</li> <li>• Use local building materials.</li> <li>• Limit construction vehicle idling time.</li> </ul>	<p>into construction contracts.</p>	<p>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>	

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<p>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Use California Air Resources Board-certified construction equipment, where available.</li> <li>• Use alternative fuel types for construction equipment where feasible.</li> <li>• Use local building materials.</li> <li>• Limit construction vehicle idling time.</li> </ul>			
<i>Hazards and Hazardous Materials</i>				
<b>APM-HAZ-1</b>	<p><b>Health and Safety Plan.</b> 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>
<b>APM-HAZ-2</b>	<p><b>Hazardous Substance Control and Emergency Response Plan.</b> 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</p>	<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</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>

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<p>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"> <li>• Proper disposal of potentially contaminated soils.</li> <li>• Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources.</li> <li>• Emergency response and reporting procedures to address hazardous material spills.</li> <li>• 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.</li> </ul> <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>	<p>according to defined procedures.</p> <p>PacifiCorp to complete its Emergency Action Plan Form, as defined.</p>		



**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
<b>APM-HAZ-3</b>	<b>Spill Prevention, Countermeasure, and Control (SPCC) Plan.</b> 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.	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.	PacifiCorp to submit a copy of the SPCC plan to CPUC.  CPUC to inspect periodically that plan requirements are being implemented.	Prior to and during construction.
<b>MM-HAZ-1</b>	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.	PacifiCorp to conduct surveys and prepare a report, as defined.  PacifiCorp to include abatement procedures in demolition and renovation plans and contract specifications, as defined.  PacifiCorp to implement abatement procedures during demolition activities.	PacifiCorp to submit a copy of the survey report to CPUC.  CPUC to ensure that commitments have been incorporated into construction contract specifications.	Prior to and during construction.
<b>MM-HAZ-2</b>	<b>Develop and Implement a Lassen Substation Project Fire Plan.</b> 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	PacifiCorp to prepare a Fire Plan, including consultation with and	PacifiCorp to submit a copy of the Fire Plan, and documentation of fire agency	Prior to and during construction.

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<p>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"> <li>• 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</li> <li>• Proper use of construction equipment</li> <li>• Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days</li> <li>• Fire coordinator and fire patrol roles and responsibilities</li> <li>• Emergency fire suppression equipment/tools, including size and documentation of response time capabilities</li> <li>• Worker training for fire prevention, initial attack firefighting, and fire reporting</li> <li>• Emergency communication, response, and reporting procedures</li> <li>• Coordination with local fire agencies to facilitate agency access through the project site</li> <li>• Emergency contact information</li> </ul>	<p>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>consultation and approval, to CPUC.</p> <p>CPUC to inspect periodically to ensure that plan requirements are being implemented.</p>	

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<ul style="list-style-type: none"> <li>• Worker education materials, tailgate meetings</li> <li>• Compliance with applicable wildland fire management plans and policies established by state and local agencies</li> <li>• Other information as provided by responsible and consulted agencies</li> </ul>			
<i>Hydrology and Water Quality</i>				
<b>APM-WQ-1</b>	<p><b>Stormwater Pollution Prevention Plan (SWPPP) or Erosion Control Plan Development and Implementation.</b> 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"> <li>• Minimizing the acreage of disturbed and exposed soil during the construction phase and implementing stabilization measures where necessary.</li> <li>• Removing sediment from runoff before it leaves the site.</li> <li>• Complying with specific erosion and sediment control measures specified within the erosion and sediment control plan.</li> </ul> <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</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>

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	<p>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>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.</p>			
<b>APM-WQ-2</b>	<p><b>Restoration.</b> 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</p>	<p>PacifiCorp to restore disturbed areas to minimize impacts to water quality, as defined.</p>	<p>PacifiCorp to provide documentation to CPUC showing compliance with this measure.</p>	<p>During and after construction.</p>

**Table 3**  
**Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
	Water Quality Control Plan for the Sacramento and San Joaquin River Basins.			
<b>APM-WQ-3</b>	<b>Pole Placement Minimization/Avoidance:</b> 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.
<b>MM-WQ-1</b>	<b>If necessary, Proper Management of Dewatering Discharges:</b> 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.
<i>Transportation and Traffic</i>				

**Table 3  
Applicant Proposed Measures and Mitigation Measures**

APM/MM Number	Description	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing and Location of Actions
<b>APM-TT-1</b>	<p><b>Traffic Management Plan:</b> 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<p>PacifiCorp to prepare and implement a Traffic Management Plan, as defined.</p> <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 a copy of the Traffic Management Plan to CPUC.</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>	<p>Prior to and during construction.</p>

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## 5 REFERENCES

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

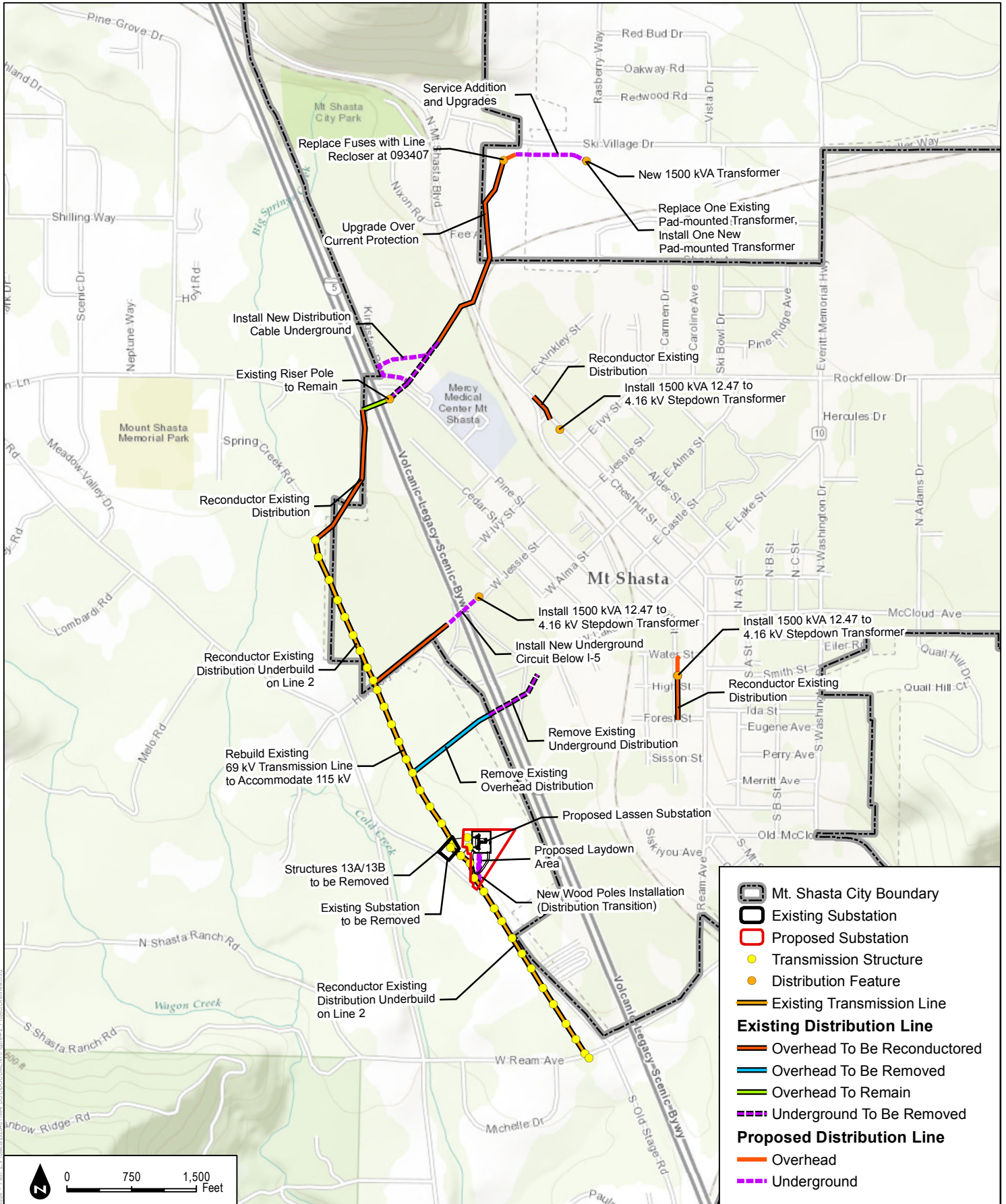
CPUC (California Public Utilities Commission). 2017. *Final Initial Study and Mitigated Negative Declaration for the PacifiCorp Lassen Substation Project (Application No. A.15-11-005)*. Prepared by Dudek for CPUC. San Francisco, California: Dudek. May 2017.

PacifiCorp. 2016. “PacifiCorp Response to CPUC Data Request 2.0.” February 22, 2016.



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**ATTACHMENT A**  
*Project Overview Map*



SOURCE: ESRI Basemaps (2016); PacifiCorp (2015)



Lassen Substation Project MMCPR

**ATTACHMENT A**  
Project Component Overview

Date: 8/11/2016 - Last saved by: esriadmin - Path: Z:\Projects\935601\MAPDOC\DOC\ENR\part4\_2\_Proposed.mxd

**ATTACHMENT B**  
*Project Contact List*

## LASSEN SUBSTATION PROJECT CONTACT LIST

Title	Name and Contact Information
<i>PacifiCorp Management Team</i>	
Project Manager	Jake Kathol, XXX-XXX-XXXX
Project Coordinator	Zoe Seidova, XXX-XXX-XXXX
<i>Environmental Monitoring Team</i>	
Environmental Project Manager and Compliance Lead	Mike Strand, Project Manager, XXX-XXX-XXXX Ken McDonald, Compliance Lead, XXX-XXX-XXXX
Environmental Monitors	Chad Corroy, XXX-XXX-XXXX
Biological Specialists	Mark Pollock, Willow Flycatcher/Avian Specialist XXX-XXX-XXXX Melissa Lippincott, Botanical Specialist, XXX-XXX-XXXX Bill Doering, Wildlife Biologist, XXX-XXX-XXXX
<i>Contractor:</i>	
Regional Business Manager	Scott Collard, XXX-XXX-XXXX
Construction Manager	Mike Shepherd, XXX-XXX-XXXX
<i>CPUC</i>	
Project Manager	Michael Rosauer XXX-XXX-XXXX
<i>Compliance Monitoring Team: Dudek</i>	
Environmental Compliance Manager	Allison Rice XXX-XXX-XXXX

**ATTACHMENT C**  
*Sample Site Inspection Form*

**MITIGATION MONITORING,  
COMPLIANCE, AND  
REPORTING PROGRAM**



**Site Inspection Form**

<b>Project:</b>	Lassen Substation Project (Application No. A.15-11-005)	<b>Date:</b>	
<b>Owner:</b>	PacifiCorp	<b>Project Component:</b>	
<b>Project Manager:</b>	TBD	<b>Report Number:</b>	
<b>Lead Agency:</b>	California Public Utilities Commission	<b>Representative:</b>	Michael Rosauer

**SITE INSPECTION CHECKLIST**

<b>Air Quality and Greenhouse Gas Emissions</b>	<b>Yes</b>	<b>No</b>
Is dust control being implemented (i.e., access roads and stockpiles watered, haul trucks covered, streets cleaned on a regular basis)?		
Do vehicles or equipment appear to be idling unnecessarily?		
Are speed limits being adhered to?		
<b>Biological Resources</b>	<b>Yes</b>	<b>No</b>
Is construction equipment being washed prior to entering the project site?		
Are native vegetation areas flagged for avoidance or restored following construction per the project revegetation plan?		
Are stream beds and banks avoided by construction activities?		
Are wetland areas accessed only in dry conditions or accessed using mats, platforms, or other protection measures?		
Are appropriate measures in place to protect sensitive resources (i.e., flagging, signage, exclusion fencing, buffers, environmental monitor)?		
Is topsoil being salvaged and handled per the topsoil salvage and relocation plan?		
Are all activities being conducted within the approved work limits?		
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		
<b>Geology and Soils</b>	<b>Yes</b>	<b>No</b>
Are recommended measures from the project's geotechnical investigation being implemented?		
<b>Hazards and Hazardous Materials</b>	<b>Yes</b>	<b>No</b>
Have all spills been cleaned up in accordance with the project's SPCC?		
Are hazardous materials being stored, labeled, handled, and managed in accordance with the Hazardous Substance Control and Emergency Response Plan?		
Are fire management measures being implemented in accordance with the Project Fire Plan?		
<b>Hydrology and Water Quality</b>	<b>Yes</b>	<b>No</b>
Are erosion and sediment control measures being implemented in accordance with the project's SWPPP?		
Are restoration and re-seeding efforts being implemented during the last phase of construction?		
Are dewatering activities being conducted in accordance with the project's notice of intent submitted to the CVRWQCB?		
Are BMPs in good condition and functional?		
<b>Transportation and Traffic</b>	<b>Yes</b>	<b>No</b>
Are traffic control measures being implemented in accordance with the project's Traffic Management Plan?		

**DESCRIPTION OF OBSERVED ACTIVITY**

**MITIGATION MEASURES VERIFIED**

**COMPLIANCE**

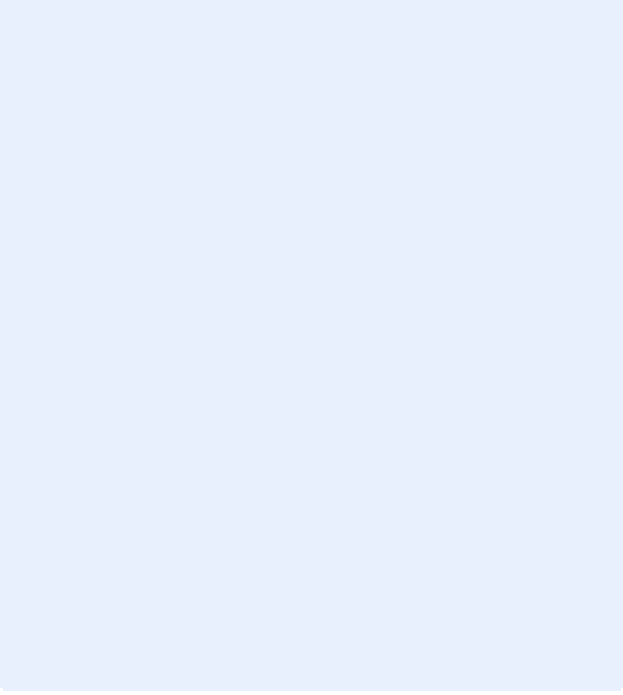
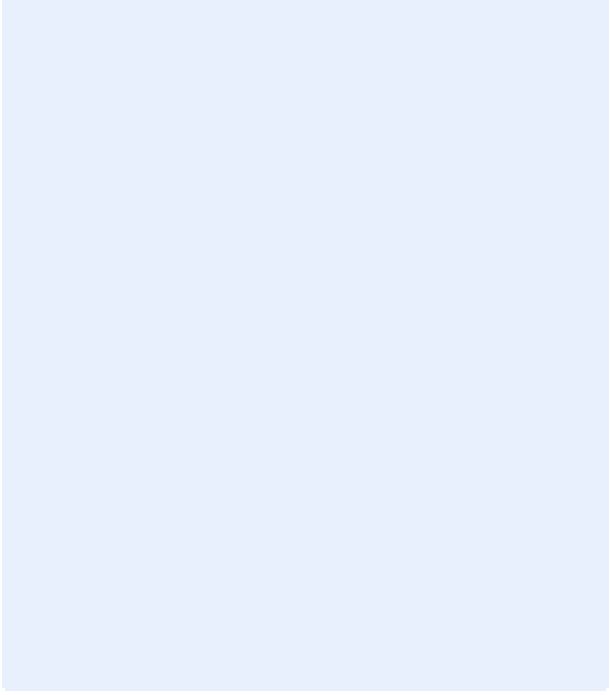
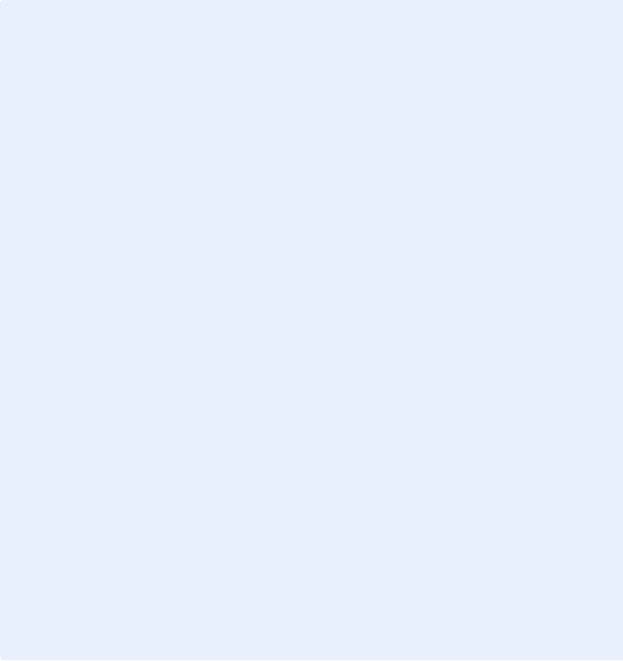
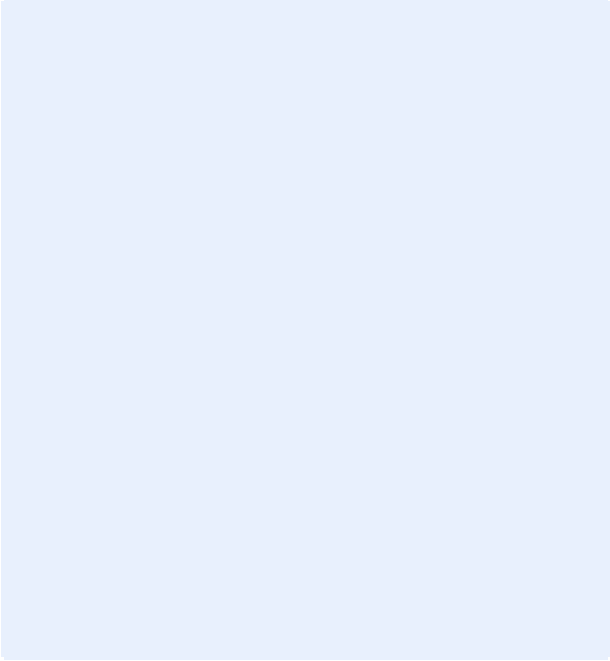
- Project is in compliance with environmental mitigation measures
- Minor deviation
- Non-compliance report

**ISSUES REQUIRING FOLLOW-UP**

Issue Requiring Follow-Up	PacifiCorp Notification	Corrective Actions Implemented by PacifiCorp



**Photos:**

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**Completed by:**

Name: \_\_\_\_\_  
Firm: \_\_\_\_\_  
Date: \_\_\_\_\_

**Distribution:**

# **ATTACHMENT D**

*Minor Project Refinement Request Form*

**PACIFICORP  
LASSEN SUBSTATION PROJECT  
MINOR PROJECT REFINEMENT  
REQUEST FORM**

<b>Date Submitted:</b>		<b>Request #:</b>	
<b>Date Approval Required:</b>		<b>Landowner:</b>	
<b>APN:</b>			
<b>Refinement from (check all that apply):</b>			
<input type="checkbox"/> Mitigation Measure	<input type="checkbox"/> APM	<input type="checkbox"/> Project Description	<input type="checkbox"/> Drawing
<input type="checkbox"/> Other			
<b>Identify source (mitigation measure, project description, etc.):</b>			
<b>Attachments (check all that apply):</b>			
<input type="checkbox"/> Refinement Screening Form (see Attachment A)	<input type="checkbox"/> Photos	<input type="checkbox"/> Maps	<input type="checkbox"/> Other
<b>As identified in Section 3.2 of the MMCRP, the CPUC may approve minor project refinements under certain circumstances. In accordance with Section 3.2 of the MMCRP, respond “yes” or “no” to the following questions (a) through (d).</b>			
<b>(a) Is the proposed refinement outside the geographic boundary of the IS/MND study area?</b>			
<b>(b) Will the proposed refinement result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the IS/MND?</b>			
<b>(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?</b>			
<b>(d) Does the proposed refinement trigger an additional permit requirement?</b>			
<b>Describe refinement being requested (attach drawings and photos as needed):</b>			

<b>Provide need for refinement (attach drawings and photos as needed):</b>					
<b>Date refinement is expected to be implemented:</b>					
<b>PacifiCorp Approvals</b>					
<b>Title</b>	<b>Name</b>	<b>Approval Initials</b>	<b>Date</b>	<b>Conditions (see attached)</b>	
District Manager				<input type="checkbox"/> Yes	<input type="checkbox"/> No
Regulatory Manager				<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Landowner Approval (if required)</b>					
<b>Landowner Name</b>		<b>Signature or Other Consent (see attached)</b>		<b>Date</b>	
<b>Resource Agency Coordination</b>					
<b>Resource Agency</b>	<b>Name</b>	<b>Action Required</b>	<b>Date</b>	<b>Documentation (see attached if yes)</b>	
				<input type="checkbox"/> Yes	<input type="checkbox"/> No
				<input type="checkbox"/> Yes	<input type="checkbox"/> No
				<input type="checkbox"/> Yes	<input type="checkbox"/> No

**ATTACHMENT A: REFINEMENT REQUEST SCREENING FORM**

# MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

## RESOURCE EVALUATION

The proposed minor project refinement was evaluated to verify that the minor project refinement would not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the IS/MND. The following table provides a brief summary of the potential impact for each resource area analyzed in the IS/MND.

<b>IS/MND Section</b>	<b>Summary of Potential Impacts</b>
Air Quality	
Biological Resources	
Geology and Soils	
Greenhouse Gas Emissions	
Hazards and Hazardous Materials	
Hydrology and Water Quality	
Transportation and Traffic	

**ATTACHMENT B: SITE MAP**

**ATTACHMENT C: REPRESENTATIVE PHOTOGRAPHS**



**Minor Project Refinement Request #**  
**Attachment C: Representative Photographs**

