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January 23, 2019

Andrew Barnsdale
California Public Utilities Commission, Energy Division
505 Van Ness Avenue
San Francisco, CA 94102-3298
(415) 703-2579

RE: Notice to Proceed (NTP) 3 Request for South of Palermo Reinforcement Project

Dear Mr. Barnsdale

On June 10, 2018, the California Utilities Commission (CPUC) voted to grant Pacific Gas & Electric Company (PG&E) a Permit to Construction (Proceeding A1604023) for the South of Palermo Reinforcement Project (SOP Project) contingent on implementation of the Mitigation Monitoring, Compliance and Reporting Program (MMRCP). PG&E requested a Notice to Proceed (NTP) 1 to cover construction at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line on May 14, 2018. CPUC approval of NTP 1 was received on June 14, 2018. PG&E requested a second NTP to cover construction at select locations along the Bogue Sub Line Segment, the Palermo Sub Segment, and the South of Palermo Line on August 6, 2018 (NTP 2). CPUC approval of NTP 2 was received on September 6, 2018.

PG&E is formally requesting a third NTP (NTP 3) from the CPUC to begin construction of the project elements described below. The following information is provided to establish PG&E's compliance with the MMRCP and resource agency permit requirements.

The following attachments are enclosed to support this request.

Attachment A: NTP 3 Locations
Attachment B: Project Schedule
Attachment C: Site Specific Measures
Attachment D: Incidental Take Permit 2081-2017-020-02

1. Location and Activities Included in NTP 3 Request

As described in the Final Initial Study/Mitigated Negative Declaration (MND), the SOP Project involves replacing existing conductor and modifying/replacing existing structures along approximately 60 miles of PG&E's existing Palermo-Rio Oso 115 kV transmission. The project will be built in overlapping phases over the course of 36 – 48 months. The project components within each phase have been determined by a number of factors, including the timing of permit approvals, permit conditions, and other constructability factors.

This Request for NTP 3 covers portions of the phase of construction beginning on April 1, 2019, and concluding by October 31, 2021, as identified in the figures included as **Attachment A** and the

constructability schedule included as **Attachment B**. Work under NTP 3 would take place at select locations along the Pease Sub Line Segment, the South of Palermo Line, and the Rio Oso Sub Segment. Work locations associated with NTP 3 are shown in yellow on the attached figures. A KMZ of the alignment, all work areas, and access routes will be provided separately as part of the NTP 3 request package to the CPUC.

The work proposed includes the following categories:

1. *Prepare work areas and access routes*: This work would be conducted on a rolling basis approximately two weeks prior to work foundation work at each location. As described in the MND, this work typically includes some mowing and minor repairs to existing access routes. The locations of the work areas for NTP 3 are identified in Attachments A and B.
2. *Winterize work areas, pullsites, and landing zones*: This work would be conducted as soon as possible following the approval of NTP 3 and be completed prior the start of the wet season (identified as October 15 but may be extended depending on weather conditions). As described in the MND, winterization typically includes temporary gravelling as well as installation of erosion control fencing for giant garter snake (GGS) exclusion fencing, as applicable, to help protect the site during the winter. The locations of the winterized areas for the work covered in NTP 3 are identified in Attachments A and B.
3. *Install/modify foundations*: This work would be conducted on a rolling basis following the preparation of work areas and access routes described above. As described in the MND, this work would generally involve excavation for installation of direct bury pole butts and poured foundations. Activities would take place in the work areas established as described above.
4. *Install tops and extensions*: This work would be conducted on a rolling basis in the work areas described above following the completion of foundation work and the availability of line clearances. This work generally involves using cranes or helicopter to install the metal structures on the direct bury pole butts and poured foundations as described above.
5. *Reconductor*: This work would be conducted from the winterized work areas, pull sites, and landing zones described above following installation of tops and extensions. Reconductoring involves the use of pull sites to remove old conductor and install new conductor. Reconductoring is scheduled for the fall and winter when longer lines clearances can be secured. The spans to be reconducted during this phase of work are identified in Attachments A and B.
6. *Remove foundations and restore*: This work will be conducted as soon as possible following structure installation and reconductoring. This work generally involves excavating foundations below surface and hydro seeding to reestablished disturbed work areas. The locations of the work areas for this phase of work are identified in Attachments A and B.

2. MMRCP Applicant Proposed Measures (APMs) and mitigation measures

The MMRCP identifies two types of requirements: (1) those that must be completed prior to the start of any construction activities; and (2) those that must be implemented prior to the construction of activities at each location. Site-specific measures are identified in **Attachment C**. All pre-construction submittals

identified in Table 1 were submitted with the previous NTP 1 request. The measures identified in Table 2 will be completed on an ongoing basis during construction.

Table 1: MMRCPP Reconstruction Submittals

Measure	Compliance Action/Submittal	Status
APM AQ-1	Fugitive Dust Control Plan to FRQAMD	Submitted with NTP 1 request
APM AQ-2	Available documentation of equipment compliance	Submitted with NTP 1 request
APM AQ-2	Fugitive dust notice and contact sign	Submitted with NTP 1 request
APM AQ-3	Receipt of FRAQMD offsite mitigation credits	Submitted with NTP 1 request
APM BIO-1	Resumes of qualified biologists	Submitted with NTP 1 request
APM BIO-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM BIO-1	Educational Brochure	Submitted with NTP 1 request
APM BIO-4	Resumes of qualified biologists	Submitted with NTP 1 request
APM BIO-11	Resumes of qualified biologists	Submitted with NTP 1 request
APM CR-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM CR-1	Resumes of qualified cultural resource specialist	Submitted with NTP 1 request
APM CR-2	Resumes of qualified archaeologists	Submitted with NTP 1 request
APM CR-4	Resumes of qualified paleontologists	Submitted with NTP 1 request
APM GHG-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HAZ-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HAZ-2	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HAZ-3	Worker Environmental Awareness Training	Submitted with NTP 1 request
MM HAZ-1	Fire Risk Management Plan	Submitted with NTP 1 request
MM HAZ-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM HYDRO-1	Storm Water Pollution Prevention Plan	Submitted with NTP 1 request
APM NOI-1	Worker Environmental Awareness Training	Submitted with NTP 1 request
APM TRA-2	Helicopter Use Plan	Submitted with NTP 1 request

Table 2: MMRCPP Ongoing Construction Requirements

Measure	Compliance Action
APM AG-1	Land owner notification, summary or compensation, and photo documentation: A notification list and summary of compensation was submitted with NTP 1 request. NTP 3 notifications will be completed prior to work at locations with agricultural land uses. Photo documentation will be included in bi-weekly monitoring reports.
APM AQ-1	FRAQMD standard construction measures: included in environmental awareness training (provided for CPUC review as part of NTP 1) and implemented throughout construction at all locations.
APM AQ-2	BCAQMD construction best practices: included in environmental awareness training (training materials provided with NTP 1 request) and implemented throughout construction at all locations.
APM BIO-2	Preconstruction surveys: The locations for the surveys are indicated in Attachment C.
APM BIO-3	Identification and marking of sensitive resources near work areas as required based on review of environmental constraints maps and APM BIO-2 surveys. The locations for the surveys are indicated in Attachment C.
APM BIO-4	Biological monitoring: monitoring will occur at locations identified in Attachment C.
APM BIO-5	Restore habitat for Special Status Plant Species: Preconstruction plant surveys were conducted in May and June 2018. No special status plants were observed. The survey report was included in the NTP 2 request.

APM BIO-6	Avoid and minimize impacts to vernal pool species: Activities under NTP 3 will avoid impacts to vernal pool species. All measures under APM BIO-6 will be implemented during construction.
APM BIO -8	VELB will be identified during implementation of APM BIO-2 and APM BIO-3. If VELB habitat is identified and compensation is required, it will be provided in accordance with PG&E's VELB Conservation Program.
APM BIO-9	Avoid and minimize impacts to GGS: Activities under NTP 3 have been designed and planned to avoid or minimize impacts to GGS. All measures under APM BIO-9 will be implemented during construction.
APM BIO-10	Compensate for permanent impacts to GGS: As identified in Attachment C, some activities under NTP 3 will occur in GGS habitat. Temporary impacts to GGS habitat have been compensated for in accordance with Incidental Take Permit 2081-2017-020-02, included as Appendix D of NTP 3 request.
APM BIO-11	Preconstruction bird surveys will be completed within 15 days prior to construction activities occurring between February 15 and August 31. The locations for the surveys are indicated in Attachment C. The results of the surveys will be documented in the bi-weekly monitoring reports.
APM BIO-12	General protection measures for wetlands and other waters: The project has been designed to minimize impacts to wetlands and other waters of the U.S. NTP 3 activities impacting wetlands and waters of the U.S. have been authorized by the U.S. Army Corps of Engineers (USACE) under Nationwide Permit (NWP) 12 – Utility Line Activities by verification letter (included in NTP 2 request). The impacts to waters of the State have been authorized by the Central Valley Regional Water Quality District through a 401 water quality certification (included in of NTP 2 request).
APM BIO-13	Compensate for permanent impacts to wetlands: No compensation was required by USACE. Permanent impacts from the project (0.015 acre) are below the 0.1-acre-threshold for mitigation in NWP 12. The USACE verification letter was included in NTP 2 request.
APM BIO-14	Restore temporarily impacted wetlands: wetlands will be restored in accordance with NWP 12. Pre-construction and post-construction photos will be included in monitoring reports.
MM BIO-1	Preconstruction plant surveys: Preconstruction plant surveys were conducted in May and June 2018. No special status plants were observed. The survey report was included in NTP 2 request.
APM CR-2	Flag and avoid identified resources: Work in the vicinity of identified resources P-58-001372, P-58001369, PL-Palermo-011H, or Old Marysville Road will avoid impacts to these previously identified resources.
APM CR-3	Unanticipated discovery protocols will be implemented throughout the project.
APM CR-4	Weekly paleo spot check monitoring will be implemented throughout foundation installation at locations identified by the contract paleontologist. The paleontologist's resume was provided to the CPUC as part of the NTP 1 package and approved with the NTP 1 approval. The results of the monitoring will be documented in the bi-weekly monitoring reports.
APM GEO-1	Measures for construction in soft and loose soils have been incorporated into the design of the project.
APM GHG-1	Measures to minimize greenhouse gas emissions: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM HAZ-1	Hazardous Substance Control and Emergency Response: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM HAZ-2	Worker Environmental Awareness and Program: Provided training materials with NTP 1 - and implemented throughout construction at all locations.
APM HAZ-3	Fire Risk Management: included in environmental awareness training (training materials

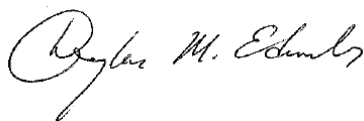
	provided with NTP 1) and implemented throughout construction at all locations.
MM HAZ-1	Fire Risk Management Plan: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM HAZ-1	Storm Water Pollution and Prevention Plan: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations. The SWPPP (WDID 5S58C383799) was provided with NTP 1.
APM NOI-1	Noise Reduction Practices: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations.
APM TRA-1	Temporary Traffic Controls: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at all locations. Copies of permits to CPUC prior to work in locations requiring permits.
APM TRA-2	Air Transit Coordination: aviation contractor will be required to comply with all FAA regulations.
APM TRA-3	Coordinate Road Closures with Emergency Service providers: included in environmental awareness training (training materials provided with NTP 1) and implemented throughout construction at locations requiring road closures, as applicable. Road closures are not anticipated for the work described in this NTP 3.
MM TRA-1	Encroachment permits: Encroachment permits for floodway, railroad, and highway crossings will be obtained prior to construction at relevant locations.

Table 3: MMRCPC Measures NOT applicable to NTP 3

Measure	Explanation
APM BIO-7	Compensate for permanent impacts to vernal pool species: the project has been designed to avoid permanent impacts to vernal pool species.
MM BIO-2	Compensation for impacts to vernal pool habitat: the project has been designed to avoid impacts to vernal pool habitat.
MM BIO-3	Compensation for impacts to northern hardpan vernal pool habitat: the project has been designed to avoid impacts to vernal pool habitat.







Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,



Doug Edwards, PhD, AICP
Senior Land Planner
Environmental Management, Electric Transmission

ATTACHMENT A: NTP 2 Locations







-  NTP 1 Structure Locations
-  NTP 2 Structure Locations
-  NTP 3 Structure Locations
-    Landing Zones and Pullsites



Legend:

- NTP 1 Structure Locations
- NTP 2 Structure Locations
- NTP 3 Structure Locations
- Landing Zones and Pullsites

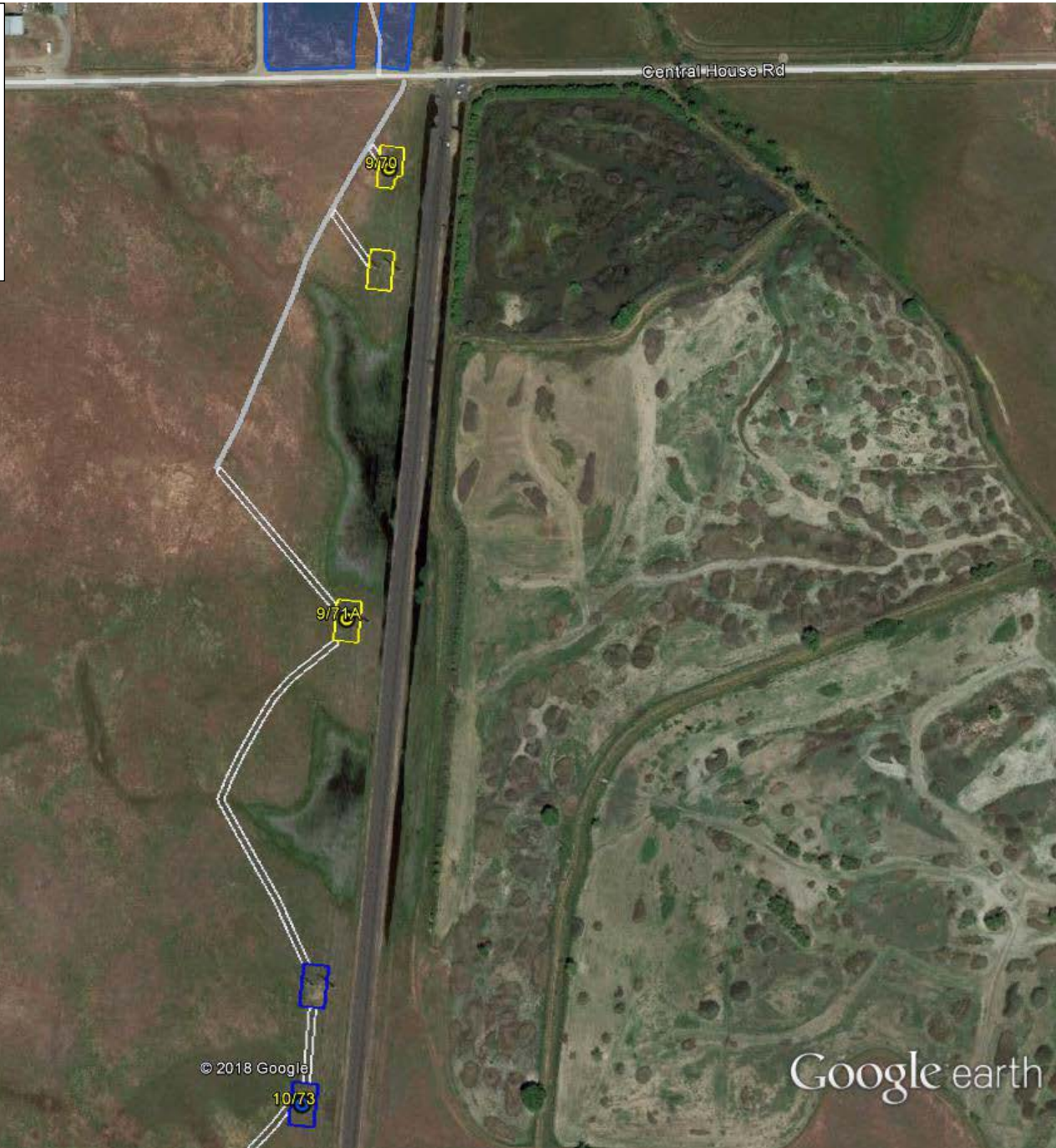








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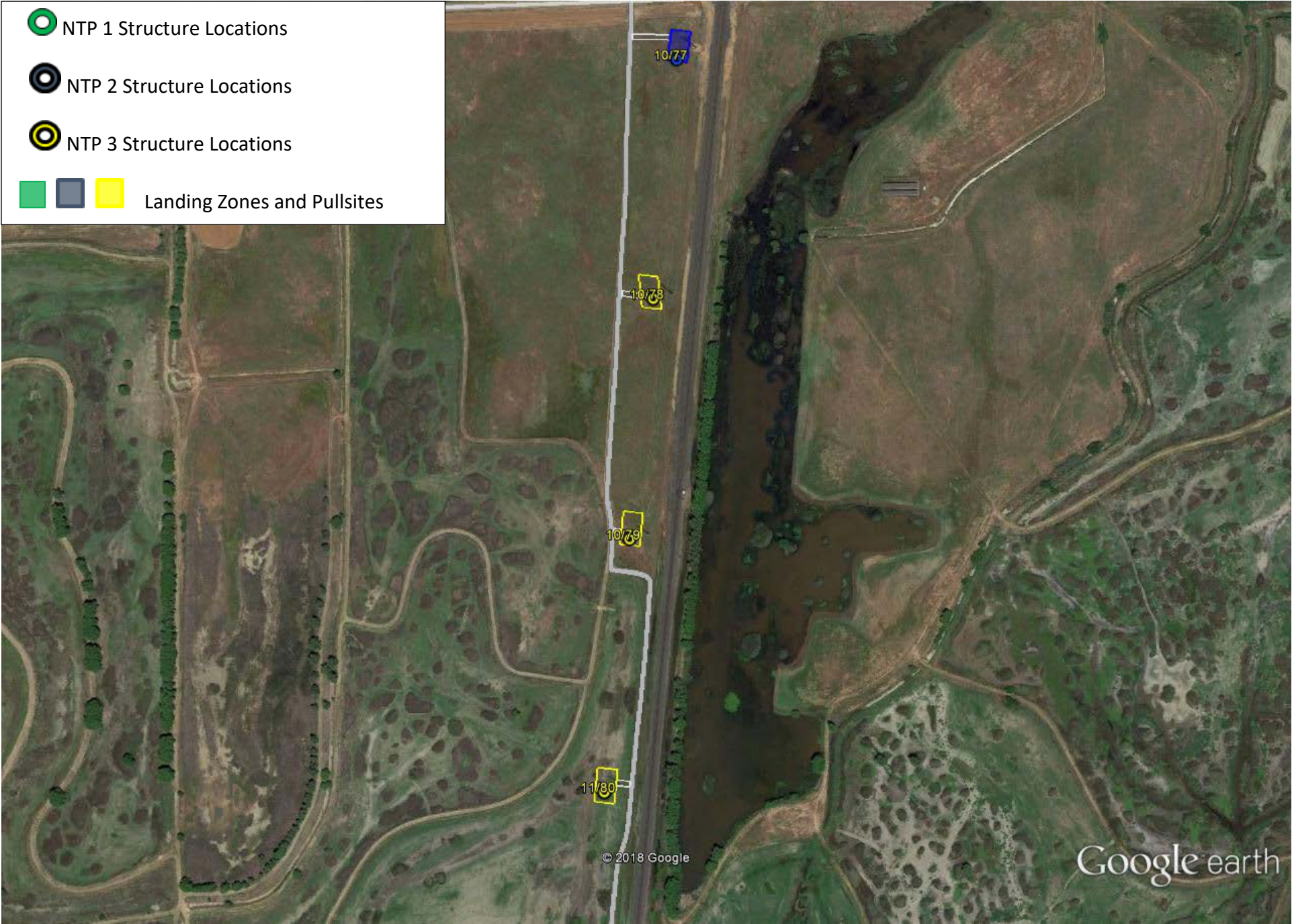








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Legend:

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-  NTP 3 Structure Locations
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Google earth

Legend for NTP Structure Locations and Landing Zones and Pullsites:

- Green circle with black outline: NTP 1 Structure Locations
- Black circle with black outline: NTP 2 Structure Locations
- Yellow circle with black outline: NTP 3 Structure Locations
- Green square: Landing Zones and Pullsites
- Grey square: Landing Zones and Pullsites
- Yellow square: Landing Zones and Pullsites



Legend:

-  NTP 1 Structure Locations
-  NTP 2 Structure Locations
-  NTP 3 Structure Locations
-    Landing Zones and Pullsites



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Legend:

- NTP 1 Structure Locations (Green circle with white center)
- NTP 2 Structure Locations (Black circle with white center)
- NTP 3 Structure Locations (Yellow circle with black center)
- Landing Zones and Pullsites (Green, Grey, and Yellow squares)



Legend for NTP Structure Locations and Landing Zones and Pullsites:







- NTP 1 Structure Locations (Green circle with white center)
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- NTP 3 Structure Locations (Yellow circle with black center)
- Landing Zones and Pullsites (Green, Gray, and Yellow squares)









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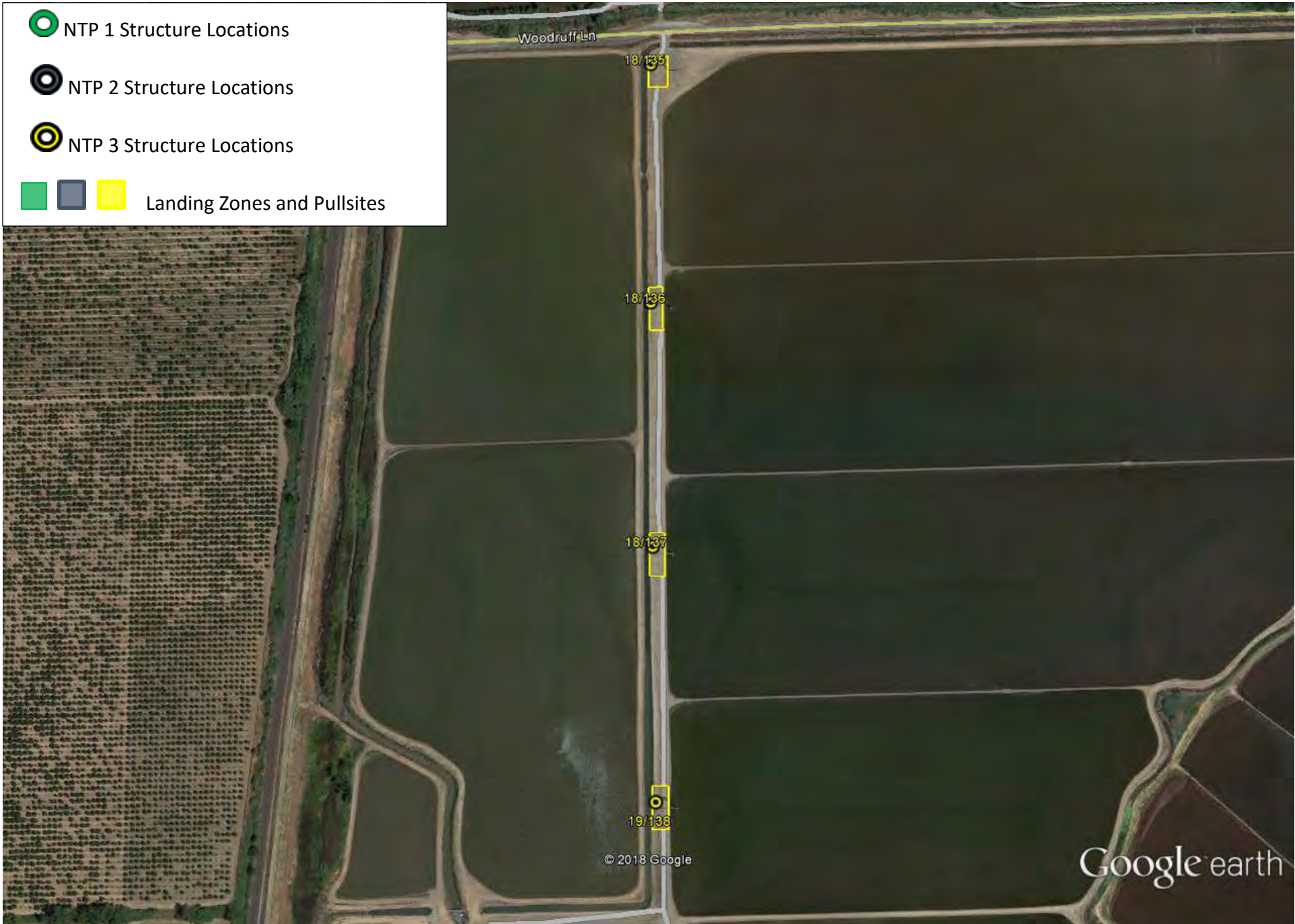
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○ NTP 1 Structure Locations
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⊙ NTP 3 Structure Locations
■ ■ ■ Landing Zones and Pullsites









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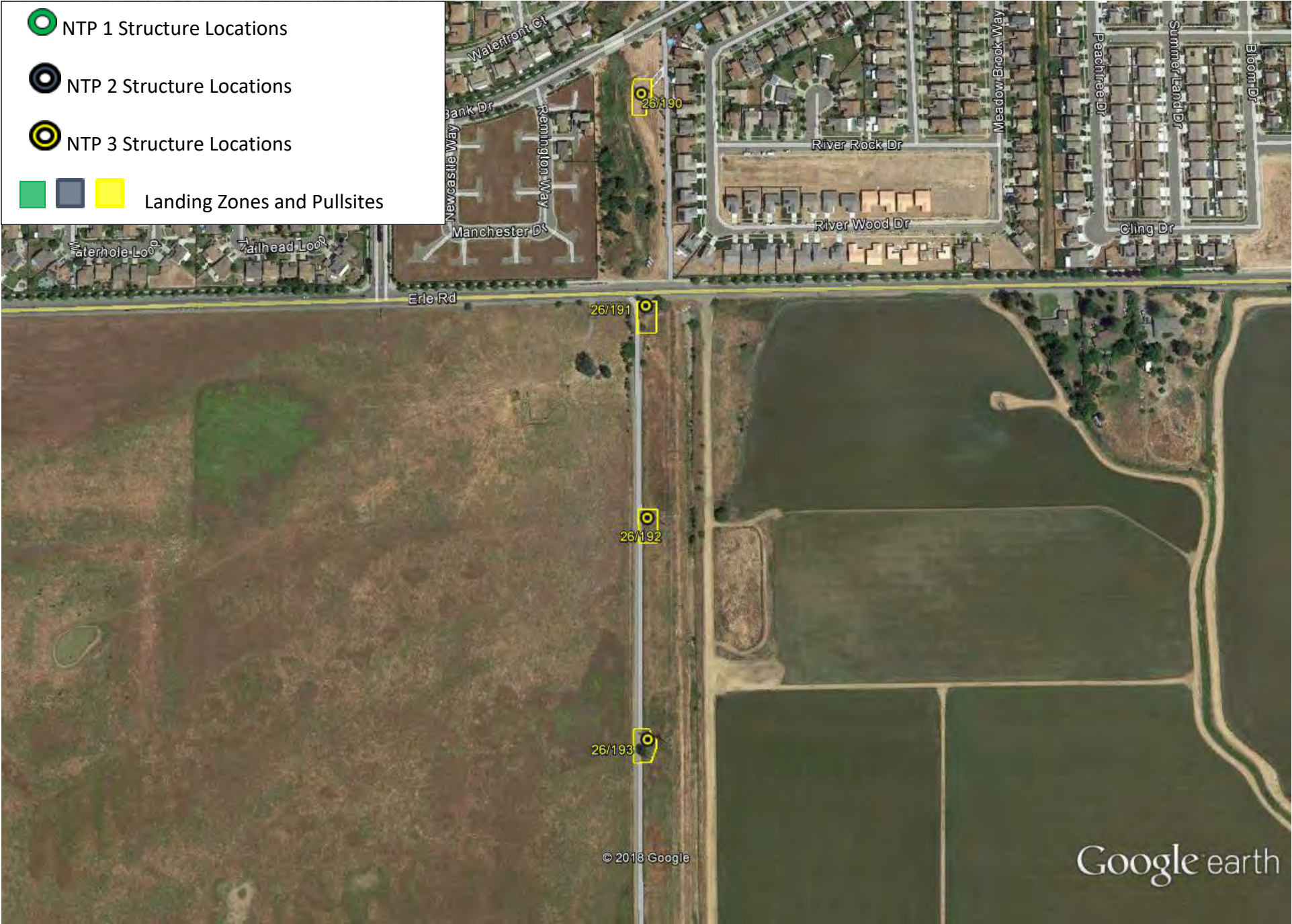


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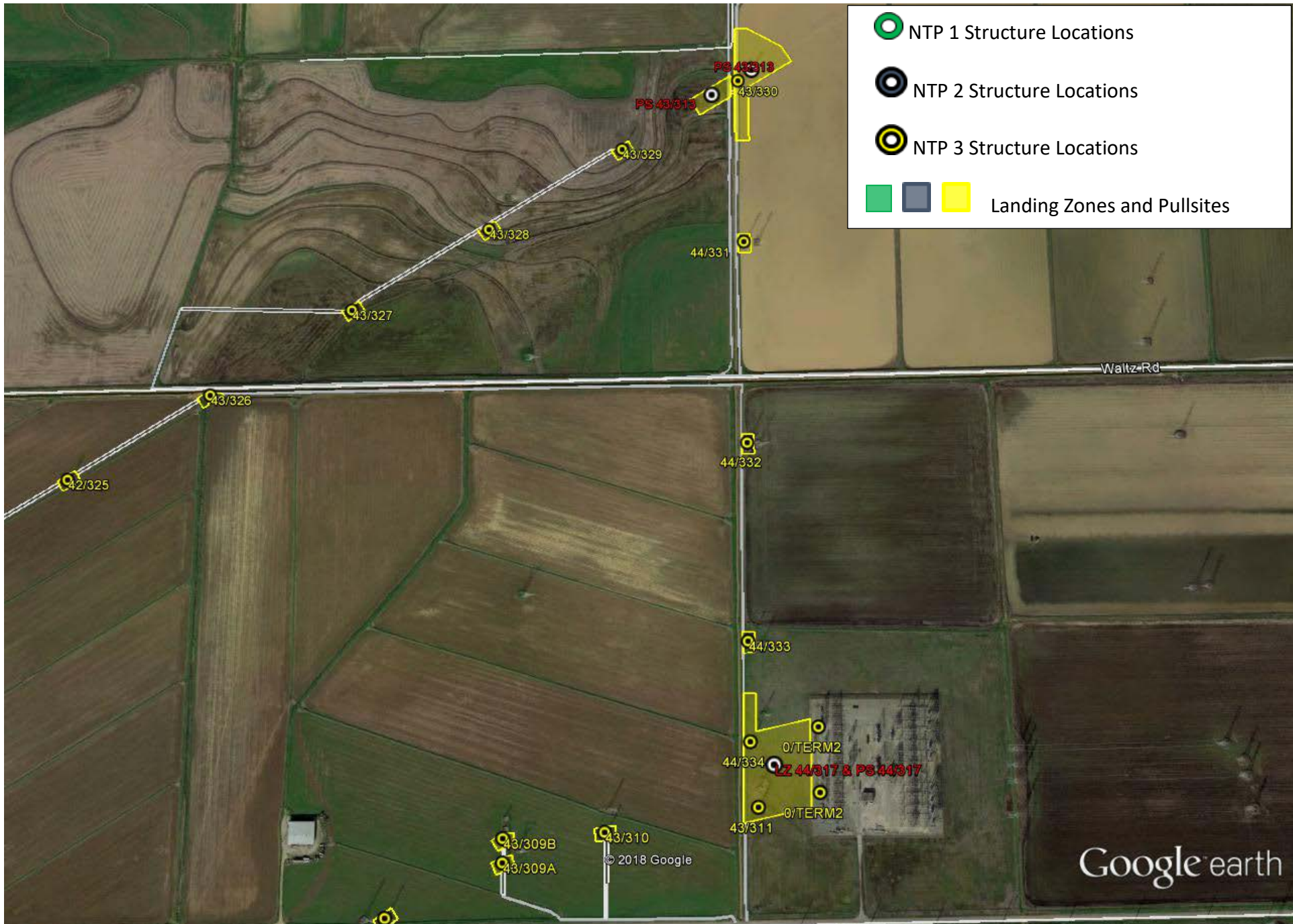
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ATTACHMENT B: Project Schedule

ATTACHMENT C: Site Specific Measures

Segment and Work Location	Work Scope	Site Specific Measures							Required Resource Agency Approvals				
		Bird Survey	Bloom Survey	Bio Survey and Flag	Bio Monitor	Restoration Monitor	Cultural Flagging	Paleo Spot Monitoring	404	401	2081	CVFPB	SIC
existing (new)													
2A Fease													
Work Areas													
0/1	F mod, reinforce	X		X	X	X		X			X	X	
0/2	F mod, TCE	X		X	X	X		X			X	X	
0/3	F mod	X		X	X	X		X			X	X	
0/4	F mod	X		X	X	X		X			X	X	
0/5	F mod, convert	X				X		X			X	X	
Landing Zones													
21/151		X		X	X	X							
Pull Sites													
21/155		X		X	X	X							
1C, 2C SOP													
Work Areas													
4/42	4/40 Install Hybrid-DLS	X		X	X	X		X			X		
5/43	5/41 Install Hybrid-DLS	X		X	X	X		X					
5/44	5/42 Install Hybrid-DLS	X	X	X	X	X		X			X		
5/45	5/43 Install DLD	X	X	X	X	X		X			X		
5/46	5/44 Install Hybrid-DLS	X		X	X	X		X					
6/47	6/45 Install Hybrid-DLS	X		X	X	X		X					
6/48	6/46 Install Hybrid-DLS	X		X	X	X		X					
9/67	9/65 Install Hybrid-DLS	X		X	X	X		X			X		
9/68	9/66 Install Hybrid-DLS	X		X	X	X		X			X		
9/69	9/67 Install Hybrid-DLS	X		X	X	X		X			X		
9/70	N/A Previously replaced	X		X	X	X		X					
9/70A	9/68 Previously replaced	X		X	X	X		X			X		
9/71A	9/69 Previously replaced	X		X	X	X		X			X		
9/72A	9/70 Previously replaced	X		X	X	X		X			X		
10/78	10/75 Install Hybrid-DLS	X		X	X	X		X			X		
10/79	10/76 Install Hybrid-DLS	X		X	X	X		X			X		
11/80	10/77 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
11/81	11/78 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
11/82	11/79 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
11/83	11/80 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
11/84	11/81 Previously replaced	X	X	X	X	X		X	X	X	X		
11/85	11/82 Install DSW	X	X	X	X	X		X	X	X	X		
11/86	11/83 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
11/87	11/84 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
11/88	11/85 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X		
12/89	11/86 Install Hybrid-DLS	X		X	X	X		X				X	
12/90	12/87 Install Hybrid-DLS	X		X	X	X		X	X			X	
12/91	12/88 Install Hybrid-DLS	X		X	X	X		X	X		X	X	
12/92	12/89 Install Hybrid-DLS	X		X	X	X		X	X			X	
12/93	12/90 Install DLT	X		X	X	X		X	X		X	X	
13/94	12/91 Install Hybrid-DLS	X		X	X	X		X	X		X	X	
15/112	15/109 Install Hybrid-DLS	X		X	X	X		X			X		
15/113	15/110 Install Hybrid-DLS	X		X	X	X		X			X		
15/114	15/111 Install Hybrid-DLS	X		X	X	X		X			X		
15/115	15/112 Install Hybrid-DLS	X		X	X	X		X			X		
16/116	15/113 Install Hybrid-DLS	X		X	X	X		X			X		
16/117	16/114 Install Hybrid-DLS	X		X	X	X		X			X		
16/118	16/115 Install Hybrid-DLS	X		X	X	X		X			X		
16/119	16/116 Install Hybrid-DLS	X		X	X	X		X			X		
16/120	16/117 Install Hybrid-DLS	X		X	X	X		X			X		
16/121	16/118 Install DLD	X		X	X	X		X			X		
16/122	N/A Remove	X		X	X	X		X			X	X	
17/123	17/119 Install DLD	X		X	X	X		X			X	X	
17/124	17/120 Install Hybrid-DLS	X		X	X	X		X			X	X	
17/125	17/121 Install Hybrid-DLS	X		X	X	X		X			X	X	
17/126	17/122 Install Hybrid-DLS	X		X	X	X		X			X	X	
17/127	17/123 Install Hybrid-DLS	X		X	X	X		X			X	X	
17/128	17/124 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X	X	
17/129	17/125 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X	X	
17/130	17/126 Install Hybrid-DLS	X		X	X	X		X			X	X	
17/131	17/127 Install Hybrid-DLS	X		X	X	X		X			X	X	
17/132	17/128 Install Hybrid-DLS	X		X	X	X		X			X	X	
18/133	17/129 Install Hybrid-DLS	X		X	X	X		X			X	X	
18/134	18/130 Install Hybrid-DLS	X		X	X	X		X			X	X	
18/135	18/131 Install Hybrid-DLS	X		X	X	X		X			X	X	
18/136	18/132 Install Hybrid-DLS	X		X	X	X		X			X	X	
18/137	18/133 Install Hybrid-DLS	X		X	X	X		X			X	X	
19/138	18/134 Install Hybrid-DLS	X		X	X	X		X			X	X	
19/139	19/135 Install Hybrid-DLS	X		X	X	X		X			X	X	
19/140	19/136 Install Hybrid-DLS	X		X	X	X		X			X	X	
19/141	19/137 Install Hybrid-DLS	X		X	X	X		X			X	X	
19/142	19/138 Install DLT	X		X	X	X		X			X	X	
19/143	19/139 Install Hybrid-DLS	X		X	X	X		X			X	X	
19/144	19/140 Install Hybrid-DLS	X		X	X	X		X			X	X	
20/145	19/141 Install Hybrid-DLS	X		X	X	X		X			X	X	
20/146	20/142 Install Hybrid-DLS	X		X	X	X		X			X	X	
20/147	20/143 Install Hybrid-DLS	X		X	X	X		X			X	X	
20/148	20/144 Install Hybrid-DLS	X		X	X	X		X			X	X	
20/149	20/145 Install DLD	X		X	X	X		X			X	X	
20/150	20/146 Install Hybrid-DLS	X	X	X	X	X		X	X	X	X	X	
20/151	20/147 Install Hybrid-DLS	X		X	X	X		X			X	X	
20/152	20/148 Install Hybrid-DLS	X		X	X	X		X			X	X	
21/153	20/149 Install Hybrid-DLS	X		X	X	X		X			X	X	
21/154	20/150 Install Hybrid-DLS	X		X	X	X		X			X	X	
21/155	21/151 Reinforce	X		X	X	X		X			X	X	
21/156	21/152 Install DLD	X		X	X	X		X			X	X	
21/157	21/153 Install Hybrid-DLS	X		X	X	X		X			X	X	
21/158	21/154 Install Hybrid-DLS	X		X	X	X		X			X	X	
21/159	21/155 Install Hybrid-DLS	X		X	X	X		X			X	X	
22/160	22/156 Install DSW	X		X	X	X		X			X	X	
22/161	22/157 Install Hybrid-DLS	X		X	X	X		X			X	X	
22/162	22/158 Install DLT	X		X	X	X		X			X	X	
22/163	22/159 Install Hybrid-DLS	X		X	X	X		X			X	X	
22/164	22/160 F mod	X		X	X	X		X			X	X	
22/165	22/161 Install DSW	X		X	X	X		X			X	X	
22/166	22/162 Install Hybrid-DLS	X		X	X	X		X			X	X	
23/167	23/163 Install DLD	X		X	X	X		X			X	X	
23/168	23/164 F mod	X		X	X	X		X			X	X	
23/169	23/165 Install DLD	X		X	X	X		X			X	X	

37/277	37/273	Install Hybrid-DLS	X		X	X	X		X			X		
37/278	37/274	Install Hybrid-DLS	X		X	X	X		X			X		
38/279	38/275	Install DLT	X		X	X	X		X			X		
38/280	38/276	Install Hybrid-DLS	X		X	X	X		X			X		
38/281	38/277	Install Hybrid-DLS	X						X					
38/282	38/278	Install Hybrid-DLS	X		X	X	X		X			X		
38/283	38/279	Install Hybrid-DLS	X		X	X	X		X			X		
38/284	38/280	Install Hybrid-DLS	X		X	X	X		X			X		
38/285	38/281	Install Hybrid-DLS	X		X	X	X		X			X		
38/286	38/282	Install Hybrid-DLS	X		X	X	X		X			X		
38/287	38/283	Install Hybrid-DLS	X		X	X	X		X			X		
38/288	38/284	Install Hybrid-DLS	X		X	X	X		X			X		
39/289	39/285	Install Hybrid-DLS	X		X	X	X		X			X		
39/290	39/286	Install Hybrid-DLS	X						X					
39/291	39/287	Install Hybrid-DLS	X						X					
39/292	39/288	Install Hybrid-DLS	X		X	X	X		X			X		
40/293	40/289	Install Hybrid-DLS	X		X	X	X		X			X		
40/294	40/290	Install Hybrid-DLS	X		X	X	X		X			X		
40/295	40/291	None	X				X		X			X		
Landing Zones														
15/111	15/108		X		X		X							
15/112	15/109		X		X	X	X					X		
17/123	17/119		X		X	X	X					X		
20/146	20/142		X		X	X	X							
12/156	21/152													
25/180A	25/176A		X		X		X							
25/180B	25/176B		X		X		X							
29/216	29/213		X						X					
32/237A	32/234A		X						X					
32/237B	32/234B		X						X					
36/264	36/261		X		X		X							
37/271	37/267		X						X					
39/292	39/288		X						X					
40/295	40/291		X						X					
Pull Sites														
15/111	15/108		X		X		X							
17/123	17/119		X		X		X							
21/155	21/151		X		X	X	X					X		
25/180	25/176		X		X		X							
26/195	26/191		X		X		X							
27/203	27/199		X						X					
29/216	29/213		X		X		X							
32/238	32/235		X		X	X	X					X		
36/264	36/261		X		X		X							
37/271	37/267		X		X		X							
40/295	40/295		X				X							
1AB - Rio Oso														
Work Areas														
40/306N	40/289 N	F mod	X		X	X	X		X			X		
40/307 N	40/290N	F mod, reinforce	X	X	X	X	X		X			X		
40/308 N	40/291N	F mod, TCE	X		X	X	X		X			X		
40/309 N	40/292N	F mod, TCE	X		X	X	X		X			X		
40/310 N	40/293N	F mod	X		X	X	X		X			X		
40/311 N	40/294N	F mod, TCE	X		X	X	X		X			X		
40/312 N	40/295N	F mod	X		X	X	X		X			X		
40/313 N	41/296N	F mod, TCE	X		X	X	X		X			X		
40/314 N	41/297N	F mod, TCE	X		X	X	X		X			X		
41/315 N	41/298N	F mod	X		X	X	X		X			X		
41/316 N	41/299N	F mod, TCE	X		X	X	X		X			X		
41/317 N	41/300N	F mod	X		X	X	X		X			X		
41/318 N	41/301N	F mod, TCE	X		X	X	X		X			X		
41/319 N	41/302N	F mod	X		X	X	X		X			X		
42/320 N	42/303N	F mod, TCE	X		X	X	X		X			X		
42/321 N	42/304N	F mod	X		X	X	X		X			X		
42/322 N	42/305N	F mod	X	X	X	X	X		X			X		
42/323 N	42/306N	F mod	X		X	X	X		X			X		
42/324 N	42/307N	F mod, TCE	X		X	X	X		X			X		
42/325 N	42/308N	F mod	X		X	X	X		X			X		
43/326 N	42/309N	F mod, TCE	X		X	X	X		X			X		
43/327 N	42/310N	F mod, TCE	X		X	X	X		X			X		
43/328 N	43/311N	F mod	X		X	X	X		X			X		
43/329 N	43/312N	F mod, TCE	X		X	X	X		X			X		
43/330 N	43/313N	F mod, reinforce	X		X	X	X		X			X		
44/331 N	44/314N	F mod	X		X	X	X		X			X		
44/332 N	44/315N	F mod	X		X	X	X		X			X		
44/333 N	44/316N	F mod	X		X	X	X		X			X		
44/334 N	44/317N	F mod	X		X	X	X		X			X		
0/TERM2 N	N/A	Substation	X		X	X	X		X			X		
40/296 S	40/292S	F mod, reinforce	X		X	X	X		X			X		
40/297 S	40/293S	Reinforce	X		X	X	X		X			X		
40/298 S	40/294S	Reinforce	X		X	X	X		X			X		
41/299 S	40/295S	Reinforce	X		X	X	X		X			X		
41/300 S	40/296S	Reinforce	X		X	X	X		X			X		
41/301 S	40/297S	F mod	X		X	X	X		X			X		
41/302 S	41/298S	F mod	X		X	X	X		X			X		
42/303 S	41/299S	F mod	X		X	X	X		X			X		
42/304 S	42/300S	F mod	X		X	X	X		X			X		
42/305 S	42/301S	TCE	X		X	X	X		X			X		
42/306 S	42/302S	Reinforce	X		X	X	X		X			X		
42/307 S	42/303S	F mod, reinforce	X		X	X	X		X			X		
43/308 S	43/304S	TCE	X		X	X	X		X			X		
43/309B S	43/305S	Install jumper	X		X	X	X		X			X		
43/309A S	43/305S	Install jumper	X		X	X	X		X			X		
43/310 S	43/306S	Install jumper	X		X	X	X		X			X		
43/311	43/307S	F mod, reinforce	X		X	X	X		X			X		
0/TERM2 S	N/A	Substation	X		X	X	X		X			X		
Landing Zones														
41/301S	41/297S		X		X		X							
43/311S	44/307S		X		X	X	X					X		
Pull Sites														
40/306N	40/289N		X		X	X	X					X		
43/330N	43/313N		X		X	X	X					X		
44/334N	44/317N		X		X	X	X					X		

**ATTACHMENT D: Incidental Take Permit 2081-
2017-020-02**



Doug Edwards
Senior Land Planner
Environmental Management,
Electric Transmission

2730 Gateway Oaks Drive
Sacramento, CA 95818
Office: (916) 203-0304

August 8, 2018

Habitat Conservation Planning Branch
California Department of Fish and Wildlife
ATTENTION: CESA Permitting Program
1416 Ninth Street, Suite 1266
Sacramento, CA 95814
(916) 358-2900

**RE: PG&E South of Palermo 115 kV Power Line Reinforcement Project Incidental Take Permit
2081-2017-020-02 Executed Original**

Dear CESA Permitting Program:

Pacific Gas & Electric Company (PG&E) is submitting a fully executed duplicate original of ITP 2081-2017-020-02.

PG&E will begin activities covered by the permit on Monday September 10, 2018. All preconstruction requirements will be completed prior to the start of covered activities.

If you have any questions regarding this submittal, please contact me at (916) 203-0304. Thank you for your assistance with this project.

Sincerely,

A handwritten signature in cursive script that reads 'Doug M. Edwards'.

Doug Edwards, PhD, AICP
Senior Land Planner
Environmental Management, Electric Transmission



State of California –The Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
www.wildlife.ca.gov

EDMUND G. BROWN, JR., Governor
CHARLTON H. BONHAM, Director



July 17, 2018

Craig Geldard, Principal Officer
Pacific Gas and Electric Company
245 Market Street N10A
San Francisco, CA 94105

**Subject: Incidental Take Permit for the South Palermo 115 kV POWER LINE
REINFORCEMENT PROJECT (2081-2017-020-02)**

Dear Mr. Geldard:

Enclosed you will find two originals of the incidental take permit for the above referenced Project, which have been signed by the Department. Please read the permit carefully, sign the acknowledgement on both copies of the permit, and return one original **no later than 30 days from Department signature**, and prior to initiation of ground-disturbing activities, to:

California Department of Fish and Wildlife
Habitat Conservation Planning Branch, CESA Permitting
Post Office Box 944209
Sacramento, CA 94244-2090

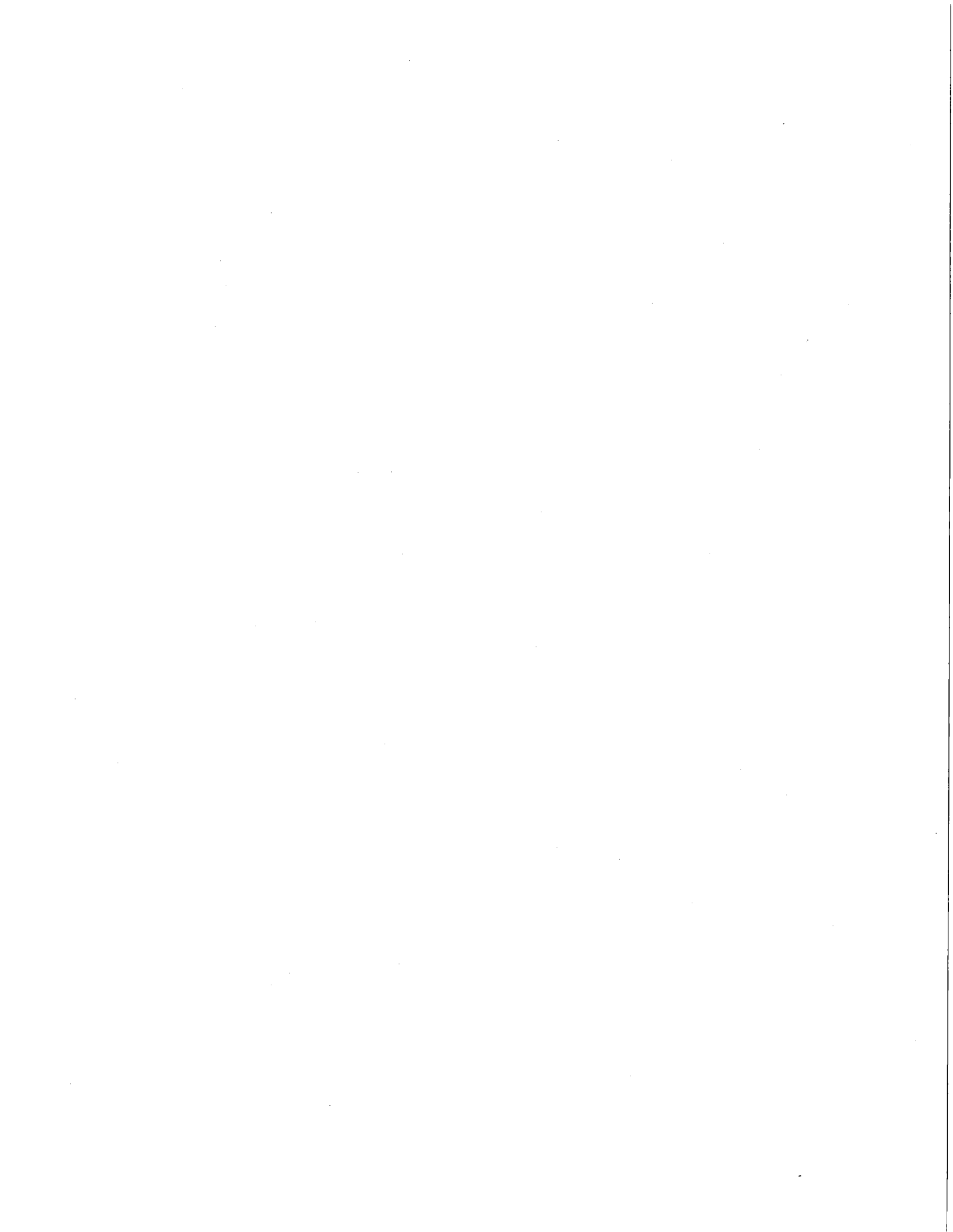
You are advised to keep the other original signature permit in a secure location and distribute copies to appropriate project staff responsible for ensuring compliance with the conditions of approval of the permit. Note that you are required to comply with certain conditions of approval prior to initiation of ground-disturbing activities. Additionally, a copy of the permit must be maintained at the project work site and made available for inspection by Department staff when requested.

The permit will not take effect until the signed acknowledgement is received by the Department. If you wish to discuss these instructions or have questions regarding the permit, please contact Patrick Moeszinger, Senior Environmental Scientist (Specialist), at (916) 358-2850.

Sincerely,


Tina Bartlett
Regional Manager

Enclosures (2)





California Department of Fish and Wildlife
North Central Region
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CA 95670

California Endangered Species Act
Incidental Take Permit No. 2081-2017-020-02

SOUTH OF PALERMO 115 kV POWER LINE REINFORCEMENT PROJECT

Authority: This California Endangered Species Act (CESA) incidental take permit (ITP) is issued by the California Department of Fish and Wildlife (CDFW) pursuant to Fish and Game Code section 2081, subdivisions (b) and (c), and California Code of Regulations, Title 14, section 783.0 et seq. CESA prohibits the take¹ of any species of wildlife designated by the California Fish and Game Commission as an endangered, threatened, or candidate species.² CDFW may authorize the take of any such species by permit if the conditions set forth in Fish and Game Code section 2081, subdivisions (b) and (c) are met. (See Cal. Code Regs., tit. 14, § 783.4).

Permittee: Pacific Gas and Electric Company
Principal Officer: Craig Geldard, (925) 286-9590
Contact Person: Doug Edwards, (916) 203-0304
Mailing Address: 245 Market Street N10A
San Francisco, CA 94105

Effective Date and Expiration Date of this ITP:

This ITP shall be executed in duplicate original form and shall become effective once a duplicate original is acknowledged by signature of the Permittee on the last page of this ITP and returned to CDFW's Habitat Conservation Planning Branch at the address listed in the Notices section of this ITP. Unless renewed by CDFW, this ITP's authorization to take the Covered Species shall expire on **December 31, 2022**.

Notwithstanding the expiration date on the take authorization provided by this ITP, Permittee's obligations pursuant to this ITP do not end until CDFW accepts as complete the Permittee's Final Mitigation Report required by Condition of Approval 7.7 of this ITP.

¹Pursuant to Fish and Game Code section 86, "'take' means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (See also *Environmental Protection Information Center v. California Department of Forestry and Fire Protection* (2008) 44 Cal.4th 459, 507 [for purposes of incidental take permitting under Fish and Game Code section 2081, subdivision (b), "'take' ... means to catch, capture or kill"].)

²"The definition of an endangered, threatened, and candidate species for purposes of CESA are found in Fish and Game Code sections 2062, 2067, and 2068, respectively.

Project Location:

The South of Palermo 115 kV Power Line Reinforcement Project (Project) is located between the communities of Oroville to the north and East Nicolaus to the south, spanning portions of Butte, Sutter, and Yuba Counties (**Figure 1**). The Project consists of five transmission line segments. The Palermo Sub Line Segment is located at the northern end of the Project area in southern Butte County; it extends westward from the Palermo Substation, which is northeast of the community of Palermo, to Palermo Junction. At that junction, the South of Palermo Line begins running south toward Trowbridge, which is east of the community of East Nicolaus. The Pease Sub Line Segment is located in Yuba and Sutter counties and connects to the South of Palermo Line at Pease Junction, northeast of the City of Marysville. It extends west from the South of Palermo Line, crosses the Feather River, State Route 70, and State Route 99, and terminates at Pease Substation. The Bogue Sub Line Segment is located in Yuba and Sutter counties. It extends west from the South of Palermo Line near the town of Olivehurst, crosses the Feather River, and then runs north to terminate at the Bogue Substation. The Rio Oso Sub Line Segment Loop is located in the southern end of the Project area, in eastern Sutter County. It extends northeast from the South of Palermo Line, connects to the Rio Oso Substation, and then loops back to Rio Oso Junction along an alignment south of Flicks Road. A more detailed overview of the Project segments and orientation on the landscape is provided in **Figures 2A and 2B**.

Project Description:

The Project involves replacing existing transmission wires (reconductoring) and modifying or replacing existing lattice steel structures along approximately 59.5 miles of the existing Palermo-Rio Oso 115 kV transmission system alignment. The Project will take place along the following segments of the existing transmission system.

- South of Palermo Line (approximately 38.7 miles) - includes portions of the Palermo-Pease and Pease-Rio Oso 115 kV lines
- Palermo Sub Line Segment (approximately 1.6 miles) - includes portions of the Caribou-Palermo and Palermo-Pease 115 kV lines
- Pease Sub Line Segment (approximately 5.2 miles) - includes portions of the Palermo-Pease and Pease-Rio Oso 115 kV lines
- Bogue Sub Line Segment (approximately 6.4 miles) - includes portions of the Palermo-Bogue and Bogue-Rio Oso 115 kV lines
- Rio Oso Sub Line Segment Loop (approximately 7.6 miles) - includes portions of the Bogue-Rio Oso, East Nicolaus-Rio Oso, Pease-Rio Oso, and Rio-Oso-West Sacramento 115 kV lines.

Incidental Take Permit
No. 2081-2017-020-02
PACIFIC GAS AND ELECTRIC COMPANY
SOUTH OF PALERMO 115 KV POWER LINE REINFORCEMENT PROJECT

New and Modified Structures

South of Palermo Line Segment. Work on the single-circuit South of Palermo Line will include the replacement of approximately 279 existing lattice steel structures with a combination of hybrid poles, tubular steel poles, and lattice steel poles and structures. Replacement structures will be placed within approximately 10 to 30 feet from the existing structures to minimize impacts. Some span lengths will be adjusted, as new structures have been sited to avoid sensitive resources.

Palermo Sub Line Segment. Only minor modifications to existing towers are planned on the Palermo Sub Line Segment.

Pease Sub Line Segment. Extensions will be installed on approximately 5 of the 25 lattice steel towers on the Pease Sub Line Segment. The addition of extensions does not require ground disturbance. Approximately one lattice steel structure will be replaced with a new lattice steel structure.

Bogue Sub Line Segment. Existing lattice steel structures on the Bogue Sub Line Segment will be modified or replaced with a combination of hybrid poles and tubular steel poles at approximately 56 locations.

Rio Oso Sub Line Segment. Extensions will be installed on approximately 15 of the 46 lattice steel structures. Approximately one lattice steel structure will be replaced in its current location with a new lattice structure tower.

Temporary Structures (guards, snub poles, shoo-fly)

Temporary guard structures will be installed at road, rail, and aboveground utility crossings. These structures will generally be direct-bury wood poles. In lieu of wood poles, bucket trucks may be used as guard structures where practical. Snub poles are temporary wood poles used to facilitate pulling operations. Approximately four temporary snub poles may be required at each pull site where the conductor cannot be attached directly to the existing structure. A shoo-fly is a temporary offset line that is installed when the line being worked on must remain energized during construction. A shoo-fly will likely be required during construction of the Bogue Sub Line Segment and will consist of wood poles installed immediately adjacent to the existing line.

Structure Installation

The installation of concrete bases/foundations for the new structures will occur primarily during the dry season (typically May 1 to October 15). Activities at each work area will

typically last only a few days. Hybrid pole bases will be direct buried into an augured hole. The prefabricated concrete base is set in the hole with a heavy crane and the hole is then backfilled and compacted. Tubular steel poles require construction of a concrete foundation. Helicopters will typically be used to install new structures on the bases/foundation during the wet season when the line can be safely de-energized and ground disturbance can be minimized.

Structure Removal

Most of the existing structures will be removed using a helicopter. To remove the existing lattice steel structures, a crane or helicopter will be rigged to the top of the tower, and the tower legs will be cut off above the foundations. The towers will be flown to a staging area where they will be crushed and transported by truck to a recycling facility. Existing foundations will generally be removed entirely; however, several located in brachiopod habitat will be left in place to minimize ground disturbance. Foundation holes will be filled in with the soils excavated for the new structure bases/foundations. Excess soil on each site will be feathered around the work area outside of sensitive habitat areas.

Reconductoring

Reconductoring will typically be done by helicopter during the wet season (typically October 16 to April 30) when line clearances are available and ground disturbance can be minimized. The existing conductor first will be detached from its support structure and temporarily lifted. Rollers then will be installed at the conductor's attachment point, and the conductor will be placed onto the rollers. The existing conductor will be pulled out and the new conductor will be pulled in. The rollers will allow the conductor to be pulled through each structure until the conductor is ready to be pulled up to the final tension position.

Work Areas, Pull Sites, and Landing Zones

Prior to power line construction, temporary work areas, pull sites, and landing zone will be established. Pull sites and work areas for removing existing towers and assembling and installing new poles will require an approximately 0.14-acre work area at each location. For tower modifications, smaller work areas of approximately 0.05 to 0.10 acre will be required. Approximately 24 pull sites will be required, and they will be located generally in line with the conductor. Each pull site will have a footprint of approximately 1 acre. Twenty-seven (27) helicopter landing zones will be used and require a temporary work footprint of up to approximately 1 acre.

Mowing and vegetation removal is the only site preparation expected to be necessary for the majority of the work areas; however, some limited leveling and filling may occur on an as-

needed basis. In general, wet season access to structures generally will be from helicopter. If construction activities take place during winter, areas will be winterized to allow for construction activities to proceed. Winterization may include matting, temporary gravelling, and installation of erosion control. Upon completion of the Project, the areas will be return to pre-project conditions, with consideration for landowner preferences.

Work areas located in flooded rice fields will be established by constructing berms that isolate the work areas and allow them to stay dry. It is expected that berm construction will be conducted entirely by the landowners. The Permittee will coordinate berm construction with rice farmers and duck club owners during the year prior to Project construction. Existing onsite soil within the rice fields will be used to construct the berms, rather than importing soil from offsite. During the next winter or spring following construction, landowners will return to these locations and reconfigure the checks and berms for the following year as required for agricultural operations.

Access Routes

Access to work areas, pull sites, and landing zones will primarily be by existing access routes. Access routes to proposed temporary work areas are generally well established, and improvements to these routes are expected to be minimal. Tree trimming and matting or plating of access routes may be required in some areas for vehicle access. When temporary overland access roads are required, they will be routed to avoid sensitive biological areas whenever possible. All temporary overland routes will be returned to preconstruction conditions following completion of Project activities.

Restoration

Temporarily impacted agricultural lands will be returned to prior agricultural use following completion of Project activities at that location. Disturbed Project areas will be reseeded in accordance with applicable state and federal agency permit requirements.

Schedule

The Project will be built out in three phases totaling approximately 36 months that will take place over four calendar years. The three phases will be broken down into construction of: (1) Rio Oso Sub Loop Segment and South of Palermo to Pease Junction; (2) Pease Sub Segment, South of Palermo to Palermo Junction, and Palermo Substation Segment; and (3) Bogue Sub Segment (**Figure 3**). Each Project phase will last approximately 12 months. The final sequencing of these phases will depend on the timing of permitting approvals, line clearance approvals, weather, and landowner preferences. Portions of one phase (such as site restoration) may overlap slightly with another phase (such as site preparation).

The duration and scope of work at each Project Site will vary depending on site conditions. For locations requiring structure replacement, the following work will be required: site and access route preparation, equipment and material staging, pole butt and foundation installation, structure removal, structure and guard structure installation, conductor installation, foundation removal and site restoration (as required) and cleanup. Work at each location will not be continuous, but rather completed in steps over the duration of the Project phase. The total duration of active construction at a particular location will typically last only a few days; however, these days may be spread out over a period of months during the Project phase.

Site and access route preparation will be completed in segments during the dry season in advance of pole butt and foundation work at sites on each segment. Work required at each location will typically last less than a day. Once the sites and routes have been prepared, equipment and materials will be staged, which typically takes less than a day. Pole butts and foundations typically are installed in one or two days, but some locations may require a slightly longer timeframe for completion, depending on location and ground constraints.

Once site preparation and foundation work is complete, there typically will not be any construction activity at these locations until clearances have been obtained, which will be during the wet season. With the exception of certain tubular steel poles, structures typically will be installed in less than a day by helicopter, with conductor transferred and old structures removed in the same day. Guard structures will be installed in segments in advance of each reconductoring pull. Installation of each guard structure will typically be less than one day. Reconductoring will be accomplished in segments between pull sites, with the duration dependent on the length of the span being pulled. Work at each pull site will typically be one or two weeks. Guard structures will be removed following completion of the pull as allowed by weather and permitting conditions. Foundations for structures being removed will be removed as soon as weather and permitting conditions allow, most likely during the following dry season in locations with wet season constraints. Site cleanup and any necessary restoration efforts will follow the removal of the foundations and should be completed within one or two days in most cases.

Installation of cage top extensions by helicopter will generally not require the preparation of work areas or access routes at each location. Work at each location will typically be less than one day.

Installation of the shoo-fly on the Bogue Sub Segment will require an additional two days of construction at each structure location.

of existing poles and structure foundations, and the weatherizing of pull sites, helicopter landing zones, and certain structure locations requiring all-season access. In general, these impacts are associated with the dewatering of rice fields and the winterization of Project Sites in order to facilitate all season access for conducting Covered Activities. The use of existing roads and overland access routes that do not require improvements/winterization are not anticipated to result in take of the Covered Species following all prescribed avoidance and minimization measures and are not included in temporary habitat impact calculations. Impacts of the authorized taking also include adverse impacts to the Covered Species related to temporal losses, increased habitat fragmentation and edge effects, and the Project's incremental contribution to cumulative impacts (indirect impacts). These impacts include: stress resulting from noise and vibrations, capture and relocation, and long-term effects due to displacement from preferred habitat, increased competition for food and space, and increased vulnerability to predation.

To mitigate the permanent and temporary impacts associated with the Covered Activities, the Permittee shall purchase Covered Species credits from a CDFW-approved mitigation/conservation bank and restore all temporarily disturbed habitat to pre-project conditions following the completion of Covered Activities. Permittee will acquire the compensatory mitigation required to fully mitigate the Project impacts to Covered Species and their habitats prior to initiating Covered Activities, or provide a Letter of Credit commensurate with the anticipated mitigation cost prior to initiating construction activities for the Project. Restoration of habitat, including revegetation and soil stabilization, will be performed as outlined in a CDFW-approved Habitat Restoration and Monitoring Plan. Restoration in Covered Species habitat areas will include the use of native seeds and plantings and will specify native species lists and propagule types, quantities of material, and appropriate success criteria and monitoring requirements.

A summary of the permanent and temporary impacts to Covered Species habitat and the compensatory mitigation required by CDFW for those Covered Activities is provided below in Table 1.

Table 1: Covered Species Habitat Impacts and Compensatory Mitigation

<i>Impact Type</i>	<i>Impact Acreage</i>	<i>Mitigation Acreage</i>
Permanent	0.085	0.255
Temporary - Aquatic	7.340	1.835
Temporary - Upland	2.117	0.529
Temporary – All Season Access	12.662	6.331
	Total = 22.204	Total = 8.950

Incidental Take Permit
No. 2081-2017-020-02
PACIFIC GAS AND ELECTRIC COMPANY
SOUTH OF PALERMO 115 KV POWER LINE REINFORCEMENT PROJECT

Maps depicting the general locations of Project work sites, proposed pole structures, pull sites, and helicopter landing zones are provided in **Figures 4A and 4B**.

Covered Species Subject to Take Authorization Provided by this ITP:

This ITP covers the following species:

Name	CESA Status
1. Giant garter snake (<i>Thamnophis gigas</i>)	Threatened ³

This species and only this species is the "Covered Species" for the purposes of this ITP.

Impacts of the Taking on Covered Species:

Project activities and their resulting impacts are expected to result in the incidental take of individuals of the Covered Species. The activities described above expected to result in incidental take of individuals of the Covered Species include: site and access preparation; permanent structure installation, modification, and removal; temporary structure (guards, snub poles, shoo-fly) installation, modification, and removal; reconductoring activities; use of work sites, pull sites, and landing zones; Project Site cleanup and restoration; and construction inspections (Covered Activities).

Incidental take of individuals of the Covered Species in the form of mortality ("kill") may occur as a result of Covered Activities such as excavation, clearing and grading, drilling, pole/foundation installation, permanent and temporary structure removal, backfill, and construction vehicle ingress/egress and staging that result in the entombment/crushing/maiming of Covered Species in burrows or vehicle strikes on the Project Site. Incidental take of individuals of the Covered Species may also occur from the Covered Activities in the form of pursue, catch, capture, or attempt to do so of the Covered Species from efforts to capture, relocate, and if necessary provide care for injured Covered Species located on or adjacent to the Project Site. The areas where authorized take of the Covered Species is expected to occur include: all Project work areas and access routes located within suitable Covered Species habitat and depicted in **Attachment 2** (collectively, the Project Site).

The Project is expected to result in the permanent loss of 0.085 acres of habitat for the Covered Species associated with new pole installation (maximum 170 new pole foundations at approximately 0.0005 impact acres/pole), and temporary disturbance of 22.119 acres (14.832 aquatic, 7.287 upland) of habitat for the Covered Species. The Covered Activities that are expected to result in temporary loss of Covered Species habitat include the removal

³See Cal. Code Regs. tit. 14 § 670.5, subd. (b)(4)(E).

Incidental Take Authorization of Covered Species:

This ITP authorizes incidental take of the Covered Species and only the Covered Species. With respect to incidental take of the Covered Species, CDFW authorizes the Permittee, its employees, contractors, and agents to take Covered Species incidentally in carrying out the Covered Activities, subject to the limitations described in this section and the Conditions of Approval identified below. This ITP does not authorize take of Covered Species from activities outside the scope of the Covered Activities, take of Covered Species outside of the Project Site, take of Covered Species resulting from violation of this ITP, or intentional take of Covered Species except for capture and relocation of Covered Species as authorized by this ITP.

Conditions of Approval:

Unless specified otherwise, the following measures apply to all Covered Activities within the Project Site, including areas used for vehicular and aircraft (e.g. helicopter) ingress and egress, equipment staging and parking, and noise and vibration generating activities that may cause take. CDFW's issuance of this ITP and Permittee's authorization to take the Covered Species are subject to Permittee's compliance with and implementation of the following Conditions of Approval:

1. **Legal Compliance:** Permittee shall comply with all applicable federal, state, and local laws in existence on the effective date of this ITP or adopted thereafter.
2. **CEQA Compliance:** Permittee shall implement and adhere to the mitigation measures related to the Covered Species in the Biological Resources section of the Mitigated Negative Declaration and Initial Study (SCH No.: 2017042051) adopted by the California Public Utility Commission on May 11, 2018, as lead agency for the Project pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.)
3. **LSA Agreement Compliance:** Permittee shall implement and adhere to the mitigation measures and conditions in the Lake and Streambed Alteration Agreement (LSAA) (Notification No. 1600-2017-0274-R2) for the Project executed by CDFW pursuant to Fish and Game Code section 1600 et seq.
4. **ESA Compliance:** Permittee shall implement and adhere to the terms and conditions related to the Covered Species in the Biological Opinion [(official Biological Opinion No.)] for the Project pursuant to the Federal Endangered Species Act (ESA). For purposes of this ITP, where the terms and conditions for the Covered Species in the federal authorization are less protective of the Covered Species or otherwise conflict with this ITP, the conditions of approval set forth in this ITP shall control.

5. ITP Time Frame Compliance: Permittee shall fully implement and adhere to the conditions of this ITP within the time frames set forth below and as set forth in the Mitigation Monitoring and Reporting Program (MMRP), which is included as **Attachment 3** to this ITP.

6. General Provisions:

- 6.1. Designated Representative. Before starting Covered Activities, Permittee shall designate a representative (Designated Representative) responsible for communications with CDFW and overseeing compliance with this ITP. Permittee shall notify CDFW in writing before starting Covered Activities of the Designated Representative's name, business address, and contact information, and shall notify CDFW in writing if a substitute Designated Representative is selected or identified at any time during the term of this ITP.
- 6.2. Designated Biologist. Permittee shall submit to CDFW in writing the name, qualifications, business address, and contact information of a biological monitor (Designated Biologist) at least 30 days before starting Covered Activities. Permittee shall ensure that the Designated Biologist is knowledgeable and experienced in the biology, natural history, and collecting and handling of the Covered Species. The Designated Biologist shall be responsible for monitoring Covered Activities to help minimize and fully mitigate or avoid the incidental take of individual Covered Species and to minimize disturbance of Covered Species' habitat. Permittee shall obtain CDFW approval of the Designated Biologist in writing before starting Covered Activities, and shall also obtain approval in advance in writing if the Designated Biologist must be changed.
- 6.3. Designated Biologist Authority. To ensure compliance with the Conditions of Approval of this ITP, the Designated Biologist shall have authority to immediately stop any activity that does not comply with this ITP, and/or to order any reasonable measure to avoid the unauthorized take of an individual of the Covered Species.
- 6.4. Education Program. Permittee shall conduct an education program for all persons employed or otherwise working in the Project area before performing any work. The program shall consist of a presentation from the Designated Biologist that includes a discussion of the biology and general behavior of the Covered Species, information about the distribution and habitat needs of the Covered Species, sensitivity of the Covered Species to human activities, its status pursuant to CESA including legal protection, recovery efforts, penalties for violations and Project-specific protective measures described in this ITP. Permittee shall provide interpretation for non-English speaking workers, and the same instruction shall be provided to any new workers

before they are authorized to perform work in the Project area. Permittee shall prepare and distribute wallet-sized cards or a fact sheet handout containing this information for workers to carry in the Project area. Upon completion of the program, employees shall sign a form stating they attended the program and understand all protection measures. This training shall be repeated at least once annually for long-term and/or permanent employees who will be conducting work in the Project area.

- 6.5. Construction Monitoring Notebook. The Designated Biologist shall maintain a construction-monitoring notebook on-site throughout the construction period, which shall include a copy of this ITP, with attachments, and a list of signatures of all personnel who have successfully completed the education program. Permittee shall ensure a copy of the construction-monitoring notebook is available for review at the Project Site upon request by CDFW.
- 6.6. Trash Abatement. Permittee shall initiate a trash abatement program before starting Covered Activities and shall continue the program for the duration of the Project. Permittee shall ensure that trash and food items are contained in animal-proof containers and removed at least once a week to avoid attracting opportunistic predators such as ravens, coyotes, and feral dogs.
- 6.7. Dust Control. Permittee shall implement dust control measures during Covered Activities to facilitate visibility for monitoring of the Covered Species by the Designated Biologist. Permittee shall keep the amount of water used to the minimum amount needed, and shall not allow water to form puddles.
- 6.8. Erosion Control Materials. Permittee shall prohibit use of erosion control materials potentially harmful to Covered Species and other species, such as monofilament netting (erosion control matting) or similar material, in potential Covered Species' habitat.
- 6.9. Delineation of Property Boundaries. Before starting Covered Activities along each part of the route in active construction, Permittee shall clearly delineate the boundaries of the Project area with fencing, stakes, or flags. Permittee shall restrict all Covered Activities to within the fenced, staked, or flagged areas. Permittee shall maintain all fencing, stakes, and flags until the completion of Covered Activities in that area.
- 6.10. Delineation of Habitat. Permittee shall clearly delineate habitat of the Covered Species within the Project area with posted signs, posting stakes, flags, and/or rope or cord, and place fencing as necessary to minimize the disturbance of Covered Species' habitat.

- 6.11. Project Access. Project-related personnel shall access the Project area using existing routes, or routes identified on the map book contained in **Attachment 2**, and shall not cross Covered Species' habitat outside of or en route to the Project Site. Permittee shall ensure that vehicle speeds do not exceed 10 miles per hour (mph) to avoid Covered Species on or traversing the roads. Paved public roads are excluded from the 10 mph speed limit. If Permittee determines construction of routes for travel are necessary outside of the Project area, the Designated Representative shall contact CDFW for written approval before carrying out such an activity. CDFW may require an amendment to this ITP, among other reasons, if additional take of Covered Species will occur as a result of the Project modification.
- 6.12. Staging Areas. Permittee shall confine all Project-related parking, storage areas, laydown sites, equipment storage, and any other surface-disturbing activities to the Project Site using, to the extent possible, previously disturbed areas. Additionally, Permittee shall not use or cross Covered Species' habitat outside of the marked Project Site unless provided for as described in Condition of Approval 6.11 of this ITP.
- 6.13. Hazardous Waste. Permittee shall immediately stop and, pursuant to pertinent state and federal statutes and regulations, arrange for repair and clean up by qualified individuals of any fuel or hazardous waste leaks or spills at the time of occurrence, or as soon as it is safe to do so. Permittee shall exclude the storage and handling of hazardous materials from the Project area and shall properly contain and dispose of any unused or leftover hazardous products off-site.
- 6.14. CDFW Access. Permittee shall provide CDFW staff with reasonable access to the Project, and shall otherwise fully cooperate with CDFW efforts to verify compliance with or effectiveness of mitigation measures set forth in this ITP.
- 6.15. Refuse Removal. Upon completion of Covered Activities, Permittee shall remove from the Project Site and properly dispose of all temporary fill and construction refuse, including, but not limited to, broken equipment parts, wrapping material, cords, cables, wire, rope, strapping, twine, buckets, metal or plastic containers, and boxes.

7. Monitoring, Notification, and Reporting Provisions:

- 7.1. Notification Before Commencement. The Designated Representative shall notify CDFW 14 calendar days before starting Covered Activities and shall document compliance with all pre-Project Conditions of Approval before starting Covered Activities.

- 7.2. Notification of Non-compliance. The Designated Representative shall immediately notify CDFW in writing if it determines that the Permittee is not in compliance with any Condition of Approval of this ITP, including but not limited to any actual or anticipated failure to implement measures within the time periods indicated in this ITP and/or the MMRP. The Designated Representative shall report any non-compliance with this ITP to CDFW within 24 hours.
- 7.3. Compliance Monitoring. The Designated Biologist shall be on-site daily when Covered Activities occur. The Designated Biologist shall conduct compliance inspections to (1) minimize incidental take of the Covered Species; (2) prevent unlawful take of species; (3) check for compliance with all measures of this ITP; (4) check all exclusion zones; and (5) ensure that signs, stakes, and fencing are intact, and that Covered Activities are only occurring on the Project Site. The Designated Representative or Designated Biologist shall prepare daily written observation and inspection records summarizing: oversight activities and compliance inspections, observations of Covered Species and their sign, survey results, and monitoring activities required by this ITP.
- 7.4. Quarterly Compliance Report. The Designated Representative or Designated Biologist shall compile the observation and inspection records identified in Condition of Approval 7.3 into a Quarterly Compliance Report and submit it to CDFW along with a copy of the MMRP table with notes showing the current implementation status of each mitigation measure. Quarterly Compliance Reports shall be submitted to the CDFW offices listed in the Notices section of this ITP and via e-mail to CDFW's Regional Representative and Headquarters CESA Program. At the time of this ITP's approval, the CDFW Regional Representative shall be contacted via email at R2CESA@wildlife.ca.gov and Headquarters CESA Program may be contacted by email is CESA@wildlife.ca.gov. CDFW may at any time increase the timing and number of compliance inspections and reports required under this provision depending upon the results of previous compliance inspections. If CDFW determines the reporting schedule must be changed, CDFW will notify Permittee in writing of the new reporting schedule.
- 7.5. Annual Status Report. Permittee shall provide CDFW with an Annual Status Report (ASR) no later than January 31, of every year beginning with issuance of this ITP and continuing until CDFW accepts the Final Mitigation Report identified below. Each ASR shall include, at a minimum: (1) a summary of all Quarterly Compliance Reports for that year identified in Condition of Approval 7.4; (2) a general description of the status of the Project Site and Covered Activities, including actual or projected completion dates, if known; (3) a copy of the table in the MMRP with notes showing the current implementation status of each mitigation measure; (4) an assessment of the effectiveness of each completed or partially completed mitigation measure in

avoiding, minimizing and mitigating Project impacts; (5) all available information about Project-related incidental take of the Covered Species; (6) an accounting of the number of acres subject to both temporary and permanent disturbance, both for the prior calendar year, and a total since ITP issuance; and (7) information about other Project impacts on the Covered Species.

- 7.6. CNDDDB Observations. The Designated Biologist shall submit all observations of Covered Species to CDFW's California Natural Diversity Database (CNDDDB) within 30 calendar days of the observation and the Designated Biologist shall include copies of the submitted forms with the next Quarterly Compliance Report or ASR, whichever is submitted first relative to the observation.
- 7.7. Final Mitigation Report. No later than 90 days after completion of all mitigation measures, Permittee shall provide CDFW with a Final Mitigation Report. The Designated Biologist shall prepare the Final Mitigation Report which shall include, at a minimum: (1) a summary of all Quarterly Compliance Reports and all ASRs; (2) a copy of the table in the MMRP with notes showing when each of the mitigation measures was implemented; (3) all available information about Project-related incidental take of the Covered Species; (4) information about other Project impacts on the Covered Species; (5) beginning and ending dates of Covered Activities; (6) an assessment of the effectiveness of this ITP's Conditions of Approval in minimizing and fully mitigating Project impacts of the taking on Covered Species; (7) recommendations on how mitigation measures might be changed to more effectively minimize take and mitigate the impacts of future projects on the Covered Species; and (8) any other pertinent information.
- 7.8. Notification of Take or Injury. Permittee shall immediately notify the Designated Biologist if a Covered Species is taken or injured by a Project-related activity, or if a Covered Species is otherwise found dead or injured within the vicinity of the Project. The Designated Biologist or Designated Representative shall provide initial written notification to CDFW by emailing the Regional Representative at R2CESA@wildlife.ca.gov. The initial notification to CDFW shall include information regarding the location, species, and number of animals taken or injured and the ITP Number. Following initial notification, Permittee shall send CDFW a written report within two calendar days. The report shall include the date and time of the finding or incident, location of the animal or carcass, and if possible provide a photograph, explanation as to cause of take or injury, and any other pertinent information.
- 7.9. Evaluation of Avoidance and Minimization Measures Following Take. When take of the Covered Species occurs as the result of Covered Activities, Permittee shall consult with CDFW to review the Project circumstances which resulted in take of the

Covered Species and evaluate whether all prudent and feasible measures have been implemented to minimize and fully mitigate the take that has occurred or may continue to occur. Permittee shall notify the CDFW Regional Representative at R2CESA@wildlife.ca.gov to initiate consultation following any Notification of Take or Injury provided by Permittee pursuant to Condition of Approval 7.8.

8. Take Minimization Measures:

The following requirements are intended to ensure the minimization of incidental take of Covered Species in the Project area during Covered Activities. Permittee shall implement and adhere to the following conditions to minimize take of Covered Species:

- 8.1. Seasonal Construction Limitations. Permittee shall ensure that ground disturbing Project activities within 200 feet of suitable aquatic habitat for Covered Species do not commence before May 1 or after October 1 of any given year, which corresponds with the Covered Species active season. Project activities may commence outside of the Covered Species active season (between October 2 and April 30) and within 200 feet of suitable aquatic Covered Species habitat, only if the Permittee coordinates with, and obtains written approval from CDFW prior to initiating Covered Activities.
- 8.2. Dewatering Habitat. Covered Species aquatic habitat must be dewatered and remain dry for at least 15 consecutive days prior to excavating or filling of the dewatered habitat during active season (May 1- October 1) Covered Activities. The Designated Biologist shall inspect the dewatered area immediately prior to excavating or filling of the dewatered habitat to ensure Covered Species are not present.
- 8.3. Exclusionary Fencing. Permittee shall establish Environmentally Sensitive Areas (ESAs) on the Project Site to minimize the disturbance of Covered Species habitat from construction-related activities. Permittee shall erect ESA fencing as directed by the Designated Biologist(s), 200 feet from the edge of potential aquatic Covered Species habitat. The Designated Biologist(s) shall identify and flag all potential small mammal burrows within the Project area as ESAs. In addition, all potential Covered Species habitat that can be reasonably avoided during construction activities shall be identified as ESAs and shall be marked by the Designated Biologist(s). All construction personnel shall avoid ESAs during all phases of the Project. Permittee shall avoid ESAs when siting all staging areas, spoils disposal areas, borrow pits, and construction equipment access routes. The Designated Biologist(s) shall inspect the fencing before the start of each workday and the Permittee shall maintain the fencing until the completion of the Project. Permittee shall remove all fencing material upon completion of the Project.
- 8.4. Construction Access. Permittee shall confine movement of heavy equipment to

existing roadways to the maximum extent practicable in order to minimize habitat disturbance. During Covered Activities, the number of access routes, number and size of staging areas, and the total area of the proposed Project activity will be limited to the minimum necessary. Routes and boundaries will be clearly demarcated. Movement of heavy equipment to and from the Project Site will be restricted to established roadways or those temporary overland access routes identified in **Attachment 2** in order to minimize habitat disturbance. All construction related vehicles shall be limited to a maximum speed of 10 miles per hour (mph) within the Project work areas and temporary overland access routes, in order to reduce potential direct impacts to the Covered Species. This is particularly important during periods when Covered Species may be sunning or moving on roadways.

- 8.5. Covered Species Encounter. If a Covered Species is encountered during the course of Covered Activities, Project activities in the immediate vicinity shall cease and the Permittee shall contact the Designated Biologist. The Covered Species should be allowed to leave the area on its own accord and construction activities shall not resume until the Covered Species has safely moved out of harm's way. If the Covered Species is not able to move out of harm's way on its own then the Designated Biologist shall relocate the Covered Species in accordance with the Covered Species Relocation Plan (Condition of Approval 8.6).
- 8.6. Covered Species Relocation Plan. Permittee shall develop a Covered Species Relocation and Rehabilitation Plan and submit it to CDFW for review and approval at least 30 days prior to initiating Covered Activities. For each proposed relocation site the Permittee shall quantify the amount, relative location, and quality of suitable habitat (aquatic and terrestrial) including invasive and non-native species present, available upland burrows/refugia, suitable prey items, and potential barriers for movement.
- 8.7. Covered Species Relocation. The Designated Biologist shall relocate Covered Species found within the Project area to appropriate habitat in accordance with the approved Covered Species Relocation and Rehabilitation Plan (Condition of Approval 8.6) and monitor the Covered Species until it is determined that the Covered Species is not imperiled by predators or other dangers. The Designated Biologist shall notify CDFW immediately or no later than noon of the next business day of any Covered Species relocation. Notification shall be via telephone, or email, followed by a written incident report. Notification shall include the ITP number, date, time, location, circumstances of the incident, and any associated data (pictures, weight, length, sex, tag #, etc.).
- 8.8. Covered Species Handling. The Designated Biologist may capture Covered Species

by hand or the use of a snake stick. Covered Species may be pinned down by placing a hand or snake stick directly behind the head and applying gentle pressure. The amount of pressure required will depend on the size of the Covered Species but it should be sufficient to prevent it from moving its head without injury. Grasp the Covered Species by the tail, handling firmly but with great care. Pick the Covered Species up gently mid-body and deposit the Covered Species in the bottom of a snake bag. Support the body of the Covered Species in addition to holding the head. Following capture, tie the top of the snake bag with a cord. Captured Covered Species shall be released as soon as practicable.

- 8.9. Covered Species Transport. During transport, all equipment used for capturing, handling and transportation shall be well maintained and checked before use. If a container other than a snake bag is used, the container shall be inspected to ensure no sharp edges, protrusions, or rough surfaces are present that could cause injury. Covered Species shall be protected from exposure to inclement weather, harsh environmental conditions, and major temperature fluctuations and extremes. Covered Species shall be observed periodically to determine their state of well-being during transport. Following use of transport containers, all items used shall be cleaned thoroughly and disinfected or discarded, as appropriate.
- 8.10. Injured Covered Species. If a Covered Species is injured as a result of Covered Activities, the Designated Biologist shall immediately take the injured animal to a CDFW approved wildlife rehabilitation or veterinary facility. Permittee shall identify the wildlife care facility in the Covered Species Relocation and Rehabilitation Plan (Condition of Approval 8.6) and receive CDFW approval before starting Covered Activities. Permittee shall bear any costs associated with the care or treatment of such injured Covered Species. The Permittee shall notify CDFW of the injury to the snake immediately by telephone and e-mail to R2CESA@wildlife.ca.gov followed by a written incident report (Condition of Approval 7.8). Notification shall include the ITP number, date, time, location, circumstances of the incident, any associated data (pictures, weight, length, sex, tag #, etc.) and the name of the facility or individual caring for the snake.
- 8.11. Deceased Covered Species. Permittee shall notify CDFW of any dead Covered Species observed on or adjacent to the Project, as described in Condition of Approval 7.8. Any dead Covered Species shall be preserved and held in a secure location until instructions are received from CDFW regarding the disposition of the specimen or until CDFW or the United States Fish and Wildlife Service (USFWS) takes custody of the specimen.
- 8.12. Pre-construction Survey. No more than 24 hours prior to the commencement of

Covered Activities at any individual Project Site, the Designated Biologist shall survey for the Covered Species within 200-feet of suitable aquatic habitat. The Designated Biologist will provide the CDFW with a written report that adequately documents the monitoring efforts within 24 hours of commencement of Covered Activities. If a lapse in Covered Activities occurs two weeks or longer at a particular Project Site, and within suitable Covered Species habitat, the Designated Biologist shall re-survey the Project Site.

- 8.13. Wildlife Checks. Workers shall inspect under vehicles and equipment for Covered Species before the vehicles and equipment are moved. If a Covered Species is present, the worker shall notify the Designated Biologist(s). Covered Activities with potential to take the Covered Species shall cease until the animal moves away from construction activities on its own or the Designated Biologist(s) moves the animal to a safe location nearby. If the individual is found within the fenced Project Site, the Designated Biologist(s) shall move the individual outside of the area of construction (as approved by CDFW pursuant to Condition of Approval 8.6).
- 8.14. Check for Wildlife in Construction Materials. The Permittee shall visually check all construction materials for the presence of wildlife sheltering within them prior to their use. Debris or rubble piles to be removed shall be inspected by the Designated Biologist to ensure that no sheltering wildlife is harmed during its removal.
- 8.15. Open Pits and Trenches. At the end of each work day, Permittee shall place an escape ramp at each end of any open trench/pit to allow any animals that may have become trapped to climb out overnight. The ramp may be constructed of either dirt fill or wood planking or other suitable material that is placed at an angle no greater than 30 degrees. Alternatively, the Permittee may cover open pits/trenches and secure the material(s) used to cover the opening and ensure that no Covered Species may enter the trench/pit and be captured.

The Designated Biologist(s) shall check all excavated open holes and trenches for Covered Species at the beginning, middle, and end of each day for trapped animals. If there are Covered Species trapped in these features, the Designated Biologist(s) shall remove and relocate the animal(s) to a safe location within suitable habitat (Condition of Approval 8.5). If the individual is found within the fenced Project Site, the Designated Biologist shall move the individual outside of the area of construction.

Before Permittee fills trenches or holes, the Designated Biologist will thoroughly inspect them for trapped Covered Species. If at any time a trapped Covered Species is discovered by the Designated Biologist(s) or anyone else, the Designated Biologist(s) shall move the animal to a safe nearby location. If the individual is found

within the fenced Project Site, the Designated Biologist(s) shall move the individual outside of the area of construction (see Condition of Approval 8.6).

8.16. Vegetation Removal. Vegetation clearing shall be limited to the minimum area necessary within 200 feet of the banks of any aquatic habitat. Equipment staging or the storage of vehicles and other equipment within 200 feet of aquatic habitat will be minimized to the greatest extent practicable. Permittee shall use one, but not both, of the following methods to handle natural debris (debris composed of on-site vegetation and/or spoils):

8.16.1. Debris shall be placed in piles 200 feet from aquatic habitat. Debris piles shall not be disturbed or removed once placed.

8.16.2. Debris shall be immediately hauled off-site for disposal.

8.17. Mowing and Excavation. Permittee shall not disk or till upland vegetation within 200 feet of aquatic Covered Species habitat. Permittee shall limit mowing of upland vegetation at the Project Site to the period from May 1 to September 30. Permittee shall raise mower blades to a minimum of six inches to avoid injuring Covered Species and to retain grassy cover. The Designated Biologist will perform clearance surveys within the area that the Permittee will clear immediately prior to mowing and will be onsite during all mowing and excavation activities.

Permittee shall start mowing farthest from the aquatic habitat in order to drive Covered Species toward the water when mowing fields near aquatic Covered Species habitat. By cutting the swath along the water last, the Covered Species will be allowed to maintain cover and escape. Permittee shall limit mowing on canal banks to one side of the channel per year to maintain cover for Covered Species. Permittee shall avoid removal of emergent vegetation (i.e., tules, cattail, sedge, and rush).

8.18. Erosion Control. Permittee shall install erosion control structures concurrently with construction. Permittee shall construct these structures so runoff is directed away from Covered Species habitat. Permittee shall ensure tightly woven fiber netting (mesh size less than 0.25 inch) or similar material for erosion control or other purposes at the Project Site is used to protect the Covered Species and other reptiles or amphibians from being trapped by the erosion control material. Coconut coir matting is an acceptable erosion control material. Permittee shall not use plastic monofilament, jute netting, or wire mesh in the straw wattles or erosion control blankets. Only erosion control materials (blankets, rolls, mats, etc.) with natural coir fibers or other materials approved by CDFW and USFWS shall be used. The edge of the material shall be buried in the ground to prevent the Covered Species and other

reptiles and amphibians from crawling underneath the material. Erosion control measures shall direct water flow into existing drainages or disperse water across vegetated areas in order to avoid concentrating water. Erosion control measures shall include the proper installation of BMPs and may include applications of seed, certified weed free straw, compost, fiber, commercial fertilizer, stabilizing emulsion mulch, or combinations thereof. Following construction all disturbed upland areas shall be stabilized and re-seeded with an erosion control mix consisting of regionally appropriate, native grass and forb species. Revegetation of such sites shall be completed as soon as possible after Project activities in those areas cease.

8.19. Stockpiling of Soil. Permittee shall stockpile soil or gravel in designated staging areas or access roads to avoid affecting previously undisturbed areas. Permittee shall install sediment barriers (e.g., silt fences, fiber rolls, and straw bales) as described in Condition of Approval 8.18 around the base of the stockpiles to intercept runoff and sediment during storm events. If necessary, Permittee will also cover stockpiles to provide additional protection against wind and water erosion.

8.20. Remove Temporary Flagging, Fencing, and Barriers. Permittee shall remove all temporary flagging, fencing, and/or barriers from the Project Site upon completion of Covered Activities.

9. Habitat Management Land Acquisition and Restoration:

CDFW has determined that permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate Project-related impacts of the taking on the Covered Species that will result with implementation of the Covered Activities. This determination is based on factors including an assessment of the importance of the habitat in the Project area, the extent to which the Covered Activities will impact the habitat, and CDFW's estimate of the acreage required to provide for adequate compensation.

To meet this requirement, the Permittee shall purchase 8.950 acres of Covered Species credits from a CDFW-approved mitigation or conservation bank (Condition of Approval 9.1). Purchase of Covered Species credits must be complete before starting Covered Activities, or within 18 months of the effective date of this ITP if Security is provided pursuant to Condition of Approval 10 below for all uncompleted obligations. The Permittee shall also restore on-site 22.119 acres of temporarily impacted Covered Species habitat pursuant to Condition of Approval 9.2 below.

9.1. Covered Species Credits. Permittee shall purchase 8.950 acres of Covered Species credits from a CDFW-approved mitigation or conservation bank prior to initiating Covered Activities, or no later than 18 months from the issuance of this ITP if Security is provided pursuant to Condition of Approval 10 below.

9.2. Habitat Restoration. Permittee shall restore on-site the 22.119 of Covered Species habitat that will be temporarily disturbed during construction to pre-project or better conditions. Within six months of issuance of this ITP, Permittee shall submit a Vegetation Restoration Plan to CDFW for review and approval. The Vegetation Restoration Plan will facilitate revegetation of the 22.119 acres of temporary construction disturbance on-site, and shall ensure that the contractor successfully implements the Plan. The Vegetation Restoration Plan shall include: (1) Removal of construction debris and stockpiled materials; (2) Re-grading the Project Site to pre-existing contours; and (3) Replanting and/or hydroseeding the restoration area with native species to stabilize the soils. All restored Covered Species habitat shall be monitored for one (1) year following completion of Covered Activities to ensure successful revegetation efforts. Photo documentation showing post-Project restoration conditions shall be submitted to CDFW with the Final Mitigation Report (Condition of Approval 7.7).

9.3. Cost Estimates. CDFW has estimated the purchase of Covered Species credits at a conservation or mitigation bank identified in Condition of Approval 9.1, estimated at \$45,000 per credit, at **\$402,750**. Temporary restoration activities have been estimated at \$2,750 per acre, at **\$60,828**.

10. Performance Security

The Permittee may proceed with Covered Activities only after the Permittee has ensured funding (Security) to complete any activity required by Condition of Approval 9 that has not been completed before Covered Activities begin. Permittee shall provide Security as follows:

10.1. Security Amount. The Security shall be in the amount of **\$463,578**. This amount is based on the cost estimates identified in Condition of Approval 9.3 above.

10.2. Security Form. The Security shall be in the form of an irrevocable letter of credit (**Attachment 4**) or another form of Security approved in advance in writing by CDFW's Office of the General Counsel.

10.3. Security Timeline. The Security shall be provided to CDFW before Covered Activities begin or within 60 days after the effective date of this ITP, whichever occurs first.

10.4. Security Holder. The Security shall be held by CDFW or in a manner approved in advance in writing by CDFW.

10.5. Security Transmittal. If CDFW holds the Security, Permittee shall transmit it to

CDFW with a completed Mitigation Payment Transmittal Form (**Attachment 5**) or by way of an approved instrument such as escrow, irrevocable letter of credit, or other.

10.6. Security Drawing. The Security shall allow CDFW to draw on the principal sum if CDFW, in its sole discretion, determines that the Permittee has failed to comply with the Conditions of Approval of this ITP.

10.7. Security Release. The Security (or any portion of the Security then remaining) shall be released to the Permittee after CDFW has conducted an on-site inspection and received confirmation that all secured requirements have been satisfied, as evidenced by:

- Written documentation of the acquisition of Covered Species credits
- Restoration of all temporarily disturbed Covered Species habitat
- Timely submission of all required reports.

Even if Security is provided, the Permittee must complete the purchase of CDFW-approved Covered Species mitigation credits no later than 18 months from the effective date of this ITP. CDFW may require the Permittee to provide additional mitigation lands and/or additional funding to ensure the impacts of the taking are minimized and fully mitigated, as required by law, if the Permittee does not complete these requirements within the specified timeframe.

Amendment:

This ITP may be amended as provided by California Code of Regulations, Title 14, section 783.6, subdivision (c), and other applicable law. This ITP may be amended without the concurrence of the Permittee as required by law, including if CDFW determines that continued implementation of the Project as authorized under this ITP would jeopardize the continued existence of the Covered Species or where Project changes or changed biological conditions necessitate an ITP amendment to ensure that all Project-related impacts of the taking to the Covered Species are minimized and fully mitigated.

Stop-Work Order:

CDFW may issue Permittee a written stop-work order requiring Permittee to suspend any Covered Activity for an initial period of up to 25 days to prevent or remedy a violation of this ITP, including but not limited to the failure to comply with reporting or monitoring obligations, or to prevent the unauthorized take of any CESA endangered, threatened, or candidate species. Permittee shall stop work immediately as directed by CDFW upon receipt of any such stop-work order. Upon written notice to Permittee, CDFW may extend any stop-work order issued to Permittee for a period not to exceed 25 additional days. Suspension and revocation of this ITP shall be governed by California Code of Regulations, Title 14, section

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783.7, and any other applicable law. Neither the Designated Biologist nor CDFW shall be liable for any costs incurred in complying with stop-work orders.

Compliance with Other Laws:

This ITP sets forth CDFW's requirements for the Permittee to implement the Project pursuant to CESA. This ITP does not necessarily create an entitlement to proceed with the Project. Permittee is responsible for complying with all other applicable federal, state, and local law.

Notices:

The Permittee shall deliver a fully executed duplicate original ITP by registered first class mail or overnight delivery to the following address:

Habitat Conservation Planning Branch
California Department of Fish and Wildlife
Attention: CESA Permitting Program
1416 Ninth Street, Suite 1266
Sacramento, CA 95814

Written notices, reports and other communications relating to this ITP shall be delivered to CDFW by registered first class mail at the following address, or at addresses CDFW may subsequently provide the Permittee. Notices, reports, and other communications shall reference the Project name, Permittee, and ITP Number (2081-2017-020-02) in a cover letter and on any other associated documents.

Original cover with attachment(s) to:

Tina Bartlett, Regional Manager
California Department of Fish and Wildlife
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
Telephone: (916) 358-2900
Fax: 358-2912

Unless Permittee is notified otherwise, CDFW's Regional Representative for purposes of addressing issues that arise during implementation of this ITP is:

Attention: CESA Desk
California Department of Fish and Wildlife
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
Telephone: (916) 358-2930

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Fax: (916) 358-2912
Email: R2CESA@wildlife.ca.gov

Compliance with California Environmental Quality Act:

CDFW's issuance of this ITP is subject to CEQA. CDFW is a responsible agency pursuant to CEQA with respect to this ITP because of prior environmental review of the Project by the lead agency, the California Public Utility Commission. (See generally Pub. Resources Code, §§ 21067, 21069.) The lead agency's prior environmental review of the Project is set forth in the South of Palermo Reinforcement Project Mitigated Negative Declaration and Initial Study (SCH No.: 2017042051) dated May 10, 2018, that the California Public Utility Commission adopted for the South of Palermo Reinforcement Project on May 11, 2018. At the time the lead agency adopted the Mitigated Negative Declaration and approved the Project it also adopted various mitigation measures for the Covered Species as conditions of Project approval.

This ITP, along with CDFW's related CEQA findings, which are available as a separate document, provide evidence of CDFW's consideration of the lead agency's Mitigated Negative Declaration for the Project and the environmental effects related to issuance of this ITP (CEQA Guidelines, § 15096, subd. (f)). CDFW finds that issuance of this ITP will not result in any previously undisclosed potentially significant effects on the environment or a substantial increase in the severity of any potentially significant environmental effects previously disclosed by the lead agency. Furthermore, to the extent the potential for such effects exists, CDFW finds adherence to and implementation of the Conditions of Project Approval adopted by the lead agency, and that adherence to and implementation of the Conditions of Approval imposed by CDFW through the issuance of this ITP, will avoid or reduce to below a level of significance any such potential effects. CDFW consequently finds that issuance of this ITP will not result in any significant, adverse impacts on the environment.

Findings Pursuant to CESA:

These findings are intended to document CDFW's compliance with the specific findings requirements set forth in CESA and related regulations. (Fish & G. Code § 2081, subs. (b)-(c); Cal. Code Regs., tit. 14, §§ 783.4, subds, (a)-(b), 783.5, subd. (c)(2).)

CDFW finds based on substantial evidence in the ITP application, the South of Palermo Reinforcement Project Mitigated Negative Declaration, the results of site visits and consultations, and the administrative record of proceedings, that issuance of this ITP complies and is consistent with the criteria governing the issuance of ITPs pursuant to CESA:

- (1) Take of Covered Species as defined in this ITP will be incidental to the otherwise lawful activities covered under this ITP

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- (2) Impacts of the taking on Covered Species will be minimized and fully mitigated through the implementation of measures required by this ITP and as described in the MMRP. Measures include: (1) permanent habitat protection; (2) establishment of avoidance zones; (3) worker education; and (4) Quarterly Compliance Reports. CDFW evaluated factors including an assessment of the importance of the habitat in the Project area, the extent to which the Covered Activities will impact the habitat, and CDFW's estimate of the acreage required to provide for adequate compensation. Based on this evaluation, CDFW determined that the protection and management in perpetuity of 8.950 acres of compensatory habitat that is contiguous with other protected Covered Species habitat and/or is of higher quality than the habitat being destroyed by the Project, along with the minimization, monitoring, reporting, and funding requirements of this ITP minimizes and fully mitigates the impacts of the taking caused by the Project
- (3) The take avoidance and mitigation measures required pursuant to the conditions of this ITP and its attachments are roughly proportional in extent to the impacts of the taking authorized by this ITP
- (4) The measures required by this ITP maintain Permittee's objectives to the greatest extent possible
- (5) All required measures are capable of successful implementation
- (6) This ITP is consistent with any regulations adopted pursuant to Fish and Game Code sections 2112 and 2114
- (7) Permittee has ensured adequate funding to implement the measures required by this ITP as well as for monitoring compliance with, and the effectiveness of, those measures for the Project
- (8) Issuance of this ITP will not jeopardize the continued existence of the Covered Species based on the best scientific and other information reasonably available, and this finding includes consideration of the species' capability to survive and reproduce, and any adverse impacts of the taking on those abilities in light of (1) known population trends; (2) known threats to the species; and (3) reasonably foreseeable impacts on the species from other related projects and activities. Moreover, CDFW's finding is based, in part, on CDFW's express authority to amend the terms and conditions of this ITP without concurrence of the Permittee as necessary to avoid jeopardy and as required by law.

Attachments:

ATTACHMENT 1	Project Figures
ATTACHMENT 2	Giant Garter Snake Habitat Impacts
ATTACHMENT 3	Mitigation Monitoring and Reporting Program
ATTACHMENT 4	Letter of Credit Form
ATTACHMENT 5	Mitigation Payment Transmittal Form

ISSUED BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

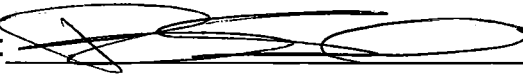
on 7/17/18



Tina Bartlett, Regional Manager
NORTH CENTRAL REGION

ACKNOWLEDGMENT

The undersigned: (1) warrants that he or she is acting as a duly authorized representative of the Permittee, (2) acknowledges receipt of this ITP, and (3) agrees on behalf of the Permittee to comply with all terms and conditions.

By:  Date: 8/7/2018

Printed Name: BRIAN Spiron Title: Supervisor

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