November 6, 2026

Dustin Joseph
LS Power Grid California, LLC
Via email: DJoseph@lspower.com

Re: Notice to Proceed #6 (NTP-6) for the LSPGC Power the South Bay Project (A.24-05-014)

Mr. Joseph,

This letter, Notice to Proceed #6 (NTP-6) for the Power the South Bay Project (Project), authorizes LS Power Grid California, LLC (LSPGC) to proceed with the use of a new 4.3-acre staging area (New Street Staging Yard) to support construction of the Project, as described below. This approval is conditional upon compliance with the methods, measures, and conditions set forth in the certified Final Environmental Impact Report (EIR) and adopted Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) for the Project, as well as the additional conditions specified in this letter, including documentation of all pending preconstruction requirements.

Background

On March 19, 2026, the California Public Utilities Commission (CPUC) voted to approve the Power the South Bay Project pursuant to Application (A.) 24-05-014 in a decision that granted LSPGC's requested certificate of public convenience and necessity (CPCN), certified the Final EIR, and adopted the MMCRP, including applicant-proposed measures (APMs) and mitigation measures for the Project.

Prior to this NTP-6, the CPUC has issued six notices to proceed (NTPs) and four minor project refinements (MPRs) to LSPGC for the Project, which are summarized below:

- **NTP-0/MPR-1:** On March 20, 2026, LSPGC submitted its first notice to proceed request (NTP-0) and minor project refinement request (MPR-1) seeking the CPUC's authorization to proceed with the preparation and use of the Fremont Staging Yard to support Project construction activities. Both NTP-0 and MPR-1 were approved March 26, 2026.
- **NTP-1:** On April 10, 2026, LSPGC submitted its second notice to proceed request (NTP-1) seeking authorization to proceed with construction of seven segments of the Newark to NRS 230 kV AC transmission line. NTP-1 was approved April 20, 2026.
- **NTP-2/MPR-2:** On May 8, 2026, LSPGC submitted its third notice to proceed request (NTP-2) seeking authorization to proceed with the construction of three segments of the Newark to NRS 230 kV AC transmission line. On May 14, 2026, LSPGC submitted its second minor project refinement request (MPR-2) for the relocation of Vault 13 from the previously

approved Project limits within Los Esteros Road to outside of, but adjacent to, the Los Esteros Road right-of-way. Both NTP-2 and MPR-2 were approved on May 21, 2026.

- **NTP-3:** On June 26, 2026, LSPGC submitted its fourth notice to proceed request (NTP-3) seeking authorization to proceed with the construction of two horizontal directional drilling (HDD) segments of the Newark to NRS 230 kV AC transmission line beneath Agua Caliente Creek and a tributary to Coyote Creek. NTP-3 was approved on July 8, 2026.
- **NTP-4:** On July 14, 2026, submitted its fifth notice to proceed request (NTP-4) seeking authorization to proceed with the construction of two HDD segments of the Newark to NRS 230 kV AC transmission line beneath Coyote Creek and two other waterways associated with the Coyote Creek Lagoon area. NTP-4 was approved on July 29, 2026.
- **NTP-5/MPR-3:** On September 11, LSPGC submitted its third minor project refinement request (MPR-3) for the use of an approximately 0.64-acre portion of a 1.8-acre work area (which was previously defined as Staging Area 6) to support bore pit excavation, equipment staging, and drilling fluid management activities associated with HDD. On September 14, 2026, LSPGC submitted its sixth notice to proceed request (NTP-5) for the construction of two HDD segments (HDD-5 and HDD-6) beneath Coyote Creek and the Guadalupe River, one splice vault (Vault 17), and installation of approximately 2,600 feet of the Newark to NRS 230 kV AC transmission line. NTP-5 and MPR-3 were both approved on September 25, 2026.
- **MPR-4:** On October 19, 2026, LSPGC submitted its fourth minor project refinement request (MPR-4) seeking authorization to use the New Street Staging Yard to support Project construction activities. MPR-4 was approved on November 6, 2026.

On October 20, 2026, LSPGC submitted its seventh notice to proceed request (NTP-6) for authorization to proceed with preparation and use of the New Street Staging Yard and a helicopter landing zone (LZ-1) located within the staging area to support construction of the Newark to NRS 230 kV AC transmission line (see Attachment 1, NTP-6 Overview Mapbook).

This letter documents the CPUC's evaluation of all activities covered in LSPGC's NTP-6 request, including compliance with applicable preconstruction requirements. See Attachment 2, Applicability and Status of Project Measures for NTP-6. The evaluation process ensures that all APMs and mitigation measures applicable to the location and activities covered in the NTP are implemented as required by CPUC Decision 26-03-043. The CPUC understands that LSPGC plans to submit subsequent notice to proceed requests for the other Project components described in the Final EIR.

Activities Authorized in NTP-6

The activities authorized by this NTP-6, as described in additional detail in the Final EIR and in LSPGC's NTP-6 request letter (NTPR-6), are as follows:

- Preparation of the New Street Staging Yard, including clearing, grubbing, and limited grading, as well as installation of gravel surfacing, perimeter security fencing, and security lighting.
- Use of the New Street Staging Yard for vehicle and equipment refueling, equipment washing, assemblage, construction equipment and materials storage, and worker parking.

- Preparation and use of a helicopter landing zone (LZ-1) within the New Street Staging Yard to support overhead conductor stringing for the transmission line (described in MPR-4).

LSPGC's NTPR-6 contains a more detailed description of the NTP-6 activities including a description of work in comparison to the Final EIR, construction schedule and duration, preconstruction requirements, and anticipated permits and approvals. All work authorized under NTP-6 will occur within the project disturbance area, as shown in the Project Overview Map (Attachment 1).

Most of the NTP-6 construction activities are anticipated to begin in November 2026 and end in April 2027. However, pulling transmission cable and other activities associated with construction of the transmission line could continue through March 2028.

Other Permits and Approvals

Construction activities included in this NTP-6 are expected to require the permit listed in Table 1 below. In accordance with the MMCRP, all permits acquired by the Project will be submitted to the CPUC for recordkeeping before commencing the activities applicable to those permits.

Table 1. NTP-6 Required Permit

Agency	Permit	Applicability to NTP-6	Status
State Water Resources Control Board (SWRCB)	National Pollutant Discharge Elimination System (NPDES) Permit for Discharge of Construction Related Stormwater	Stormwater Pollution Prevention Plans (SWPPPs) are required for stormwater discharges associated with construction activities that disturb more than 1 acre of land.	LSPGC has prepared a Notice of Intent (NOI) for use of the 2022 Construction General Permit, which includes the NTPR-6 scope. The SWPPP was approved under WDID: 201C411672 and has been provided to the CPUC.

Revisions Made to NTPR-6 MMCRP Requirements Tracking Table

The following changes have been made to the MMCRP Requirements Tracking Table (Attachment 2) provided as part of the NTP-6 request letter.

- **APM BIO-3: Preconstruction Sweeps and Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife**. Status was revised to include the additional context that in addition to the golden eagle protocol surveys, LSPGC completed a habitat assessment survey and accompanying desktop review which determined that no suitable habitat for any other species is present within the staging yard.
- **APM UTIL-1: Coordination with Utilities**. Applicability was changed to "Applicable" and the status was changed to "Pending/Ongoing" because ground disturbance may occur.

Notice to Proceed and Conditions of Approval

LSPGC is hereby authorized to proceed with the construction activities described in the NTP-6 request, provided that all activities are carried out in accordance with the methods and conditions described in the request and this NTP-6, as well as all applicable mitigation measures and APMs identified in the adopted MMCRP (see Attachment 2). The following preconstruction actions must be

completed prior to the commencement of the NTP-6 activities, or applicable parts of the NTP-6 activities, as specified below:

- LSPGC will provide the CPUC with a technical memorandum documenting the results of the habitat assessment survey completed at the site on November 24, 2025.
- LSPGC will provide the CPUC with documentation of correspondence with the property owner confirming permissions are in place, including any applicable conditions of use.
- LSPGC will submit a helicopter plan to the CPUC at least 14 days before commencing helicopter operations.
- Pursuant to APM UTIL-1, LSPGC will perform an Underground Service Alert utility search to locate and mark underground utilities at least 72 hours before any subsurface excavation with the potential to conflict with a buried utility at the New Street Staging Yard.

No construction activities will commence prior to completion of the applicable preconstruction requirements. Please submit documentation of completion of the preconstruction requirements listed above to the CPUC prior to the start of NTP-6 construction activities, and feel free to contact me at tommy.alexander@cpuc.ca.gov with any questions or concerns.

Sincerely,



Tommy Alexander
CEQA Project Manager
California Public Utilities Commission

Cc: Lucy Marton, LSPGC
Michelle Wilson, CPUC
Phill Peters, ESA
Vince Molina, ESA

Attachments:
1. NTP-6 Project Components Mapbook
2. Applicability and Status of Project Measures for NTP-6

Attachment 1

NTP-6 Project Overview Map



POWER THE SOUTH BAY PROJECT
NTP-6 - New Street
Staging Yard and Landing Zone
City of San Jose, CA

LEGEND

NTP-6 Components

Staging Area

Landing Zone

General Features

Municipal Boundary

0 50 100 200 300
Feet



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Sources: Heritage, 2023; LSPGC, 2023; Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community, National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

Attachment 2

Applicability and Status of Project Measures for NTP-6

Table 2 identifies all APMs, mitigation measures and any applicable regulatory agency conditions described in the MMCRP along with the status of compliance for the Project activities authorized in NTP-6.

Table 2. Applicability and Status of Project Measures for NTP-6

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction: The use of outdoor lighting shall be minimized during construction, operations, and maintenance. Photocell and motion detection-controlled lighting shall be provided at a level sufficient to provide safe entry and exit to the Project work sites and to ensure the security of the sites. All lighting shall be selectively placed, shielded, and directed to minimize fugitive light. Portable lights shall be operated at the lowest feasible wattage and height. The number of nighttime lights used shall be limited to those necessary to accomplish the task completely and safely. All lighting near sensitive species habitat shall be directed away from these areas where feasible.	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-6 construction activities.
Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – Tier 4 Final Emissions Controls: LSPGC shall ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 final emissions controls. An initial listing that identifies each off-road unit's certified tier specification to be operated on the Project shall be submitted to the CPUC before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to the CPUC. As LSPGC requires new or replacement construction equipment on the Project, LSPGC shall document verification of the certified engine tier before the equipment's use on Project sites. Before the start of construction, LSPGC shall develop a diesel-powered equipment-use hours tracking tool and procedure. The tracking tool shall be utilized by LSPGC to keep track of the certified engine tier and daily equipment use hours of all off-road diesel-powered equipment. If all diesel-powered equipment is Tier 4 final certified, the tracking tool is not required. The tracking tool shall be maintained by LSPGC, and tracking updates shall be submitted to the CPUC on a monthly basis for the duration of construction to track the Project's compliance. The updated tracking tool shall be submitted to the CPUC no later than the tenth day of each month.	Applicable	**Ongoing**. Preconstruction requirements are complete. LSPGC submitted the initial equipment listing to CPUC in compliance with this measure on March 20, 2026. LSPGC will utilize the diesel-powered equipment-use hours tracking tool to track daily equipment use hours of off-road, diesel-powered equipment, and will submit monthly reports to CPUC if non-Tier 4 final equipment is used on the Project.

Key	
	Measure Not Applicable to NTP-6
	Applicable to NTP-6 – Measure to be Implemented During Construction/Restoration/Operation
	Applicable to NTP-6 – Preconstruction Status Pending/Ongoing
	Applicable to NTP-6 – Preconstruction Status Complete/Approved

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
Mitigation Measure 3.3-2b: Use Best Management Practices for Construction-Related Fugitive Dust Emissions: LSPGC shall implement all the following best management practices, which would reduce fugitive PM10 and PM2.5: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. The watering regimen may be adjusted during rain events as needed. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition activities in undeveloped or unpaved Project locations shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off prior to leaving the site in undeveloped or unpaved Project locations. • Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Post a publicly visible sign with the telephone number and person to contact at the CPUC regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. • Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities. • Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of staging yards used for the Project. Wind breaks should have a maximum of 50 percent air porosity. • Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible, unless specified otherwise by the restoration plan, and watered appropriately until vegetation is established. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Minimize the amount of excavated material or waste materials stored at the site.	Applicable	LSPGC and its contractors will implement the applicable best management practices related to fugitive dust emissions during NTPR-6 construction activities.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
• Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.		
APM BIO-1: Restoration of Disturbed Areas: Once construction is complete in a given area, natural vegetation areas (annual grassland, annual grassland/wetland, riparian, wetland, and vernal pools) that are temporarily disturbed by Project activities shall be restored to approximate preconstruction conditions. Areas that are temporarily disturbed by grading, augering, or equipment movement shall be restored to their original contours and drainage patterns. Work areas shall be decompacted, and salvaged topsoil materials shall be respread following recontouring to aid in restoration of temporary disturbed areas. Revegetation activities shall be conducted in accordance with the Project SWPPP and APMs. Restoration could include recontouring, reseeding, and planting replacement of natural vegetation, as appropriate. Temporarily disturbed natural vegetation areas shall be revegetated with appropriate weed-free native seed mixes or species that are characteristic of the plant community that was disturbed.	Applicable	There are no natural vegetation areas within the New Street Staging Yard, however LSPGC and its contractors will restore the staging area to approximate preconstruction conditions following completion of NTPR-6 activities.
APM BIO-2: Rare Plant Surveys: Protocol surveys following standard guidelines shall be conducted within suitable habitat areas for special-status plants that may occur within the Project impact areas during the appropriate blooming period to determine the location and extent of populations of rare plants, if present. In the event of the discovery of a rare plant, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, LSPGC shall consult with the USFWS for ITP, as required. There are no CDFW-listed species that were analyzed, but CNPS species would require surveys and potential mitigation if they cannot be avoided. Construction activities that may impact rare plants, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Upon the discovery of sensitive plants, the qualified biologist shall have the authority to stop work activities and, following the identification and implementation of steps required to avoid or minimize impacts to sensitive plants, direct construction work to commence once more.	Not Applicable	The New Street Staging Yard has been previously disturbed and appears to be regularly disced or mowed for vegetation maintenance. Potential to occur (PTO) for all special-status plant species was determined to be low; therefore, protocol-level rare plant surveys were not required.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM BIO-3: Preconstruction Sweeps: Prior to initial vegetation clearance and ground-disturbing activities, a qualified biologist shall conduct preconstruction survey sweeps of the Project work area for special-status wildlife and plants in potentially suitable habitats. In the event of the discovery of a special-status plant, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, LSPGC shall seek coverage from the Santa Clara Valley HCP, or shall consult with the USFWS and/or CDFW for take ITP or other authorization as well as any additional mitigation. Any other construction activities that may impact sensitive biological resources, including movement of construction equipment and other activities outside of the fenced/paved areas within wildlife habitat, shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources. These surveys will be conducted within 30 days of the start of construction activities and after protocol surveys for individual species have been conducted. These surveys serve to doublecheck populations, nesting/breeding areas, and sensitive habitats that would be identified during protocol surveys and to ensure that these areas will be avoided by construction activities.	Not Applicable	Protocol-level surveys determined that no suitable habitat for golden eagle is present within the New Street Staging Yard. Additionally, LSPGC completed a habitat assessment survey and accompanying desktop review which determined that no suitable habitat for any other species is present within the staging yard. As such, preconstruction survey sweeps for special-status species are not required for NTPR-6 construction activities.
APM BIO-4: Sensitive Area Demarcation: All sensitive biological areas (including creeks, rivers, wetlands, vernal pools, riparian areas, and special-status species habitats) within the Project work area shall be clearly marked prior to construction commencement to restrict construction activities and equipment from entering these areas, except as necessary for construction activities. These markings shall be inspected regularly to ensure that they remain in place.	Not Applicable	There are no sensitive biological areas within the New Street Staging Yard.
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas: Vehicles and equipment shall be cleaned prior to use in native habitat on the Project areas to avoid the spread of noxious weeds and nonnative invasive plant species.	Not Applicable	There is no native habitat present within the New Street Staging Yard.
APM BIO-6: Vehicle Speed Limits: Speed of vehicles driving along proposed access roads and on the Project site during construction and operation shall be limited to 15 mph, except in the case of legal roadgoing vehicles traveling on portions of the Project site that are public roadways, which shall be limited to posted speed limits. In addition, construction and maintenance employees shall be required to stay on established and clearly marked and existing roads, except where not feasible due to physical or safety constraints and shall be advised that care should be exercised when commuting to and from the Project area.	Applicable	LSPGC and its contractors will implement this measure during NTPR-6 construction activities.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM BIO-7: Salt Marsh Harvest Mouse Surveys: Suitable habitat for salt marsh harvest mouse (SMHM) and suitable adjacent areas shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted prior to construction activity. Any other construction activities that may impact SMHM including movement of construction equipment within suitable habitat or suitable adjacent areas would be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to SMHM, such as allowing individuals to leave on their own or temporarily halting construction in areas where SMHM is present. All adjacent known SMHM preserve areas shall be clearly marked as well and avoided. This APM would be applied along the transmission line west of the proposed alignment in the vicinity of Coyote Creek Lagoon.	Not Applicable	There is no suitable habitat for SMHM within the New Street Staging Yard.
APM BIO-8: Excavation Wildlife Safety Best Management Practices: Excavated holes/trenches that are not within areas that have wildlife exclusion fencing or that are not filled at the end of the workday shall be covered, or a wildlife escape ramp shall be installed to prevent the inadvertent entrapment of wildlife species.	Applicable	LSPGC and its contractors will implement this measure during NTPR-6 construction activities as needed.
APM BIO-9: Worker Environmental Awareness (WEAP) Training: A WEAP shall be developed and implemented to educate all on-site construction workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction activities. This WEAP shall include measures to reduce trash buildup during construction.	Applicable	**Ongoing.** The preconstruction requirements are complete. The Project WEAP was submitted to the CPUC on March 20, 2026. The WEAP includes protocols to avoid harming wildlife and reduce trash buildup during construction. All personnel will be WEAP-trained prior to performing work on the Project. WEAP sign-in sheets will be submitted with the quarterly compliance reports provided to the CPUC.
APM BIO-10: Outdoor Lighting Measures: The use of outdoor lighting during construction and O&M shall be minimized whenever practicable. All lighting shall be selectively placed, shielded, and directed downward to the extent practicable. All lighting near sensitive species habitat shall be directed away from these areas to the extent practicable. Night work shall be avoided as practicable; however, given the large amount of construction proposed within existing roads, local municipalities may dictate that transmission line construction occurs at nighttime within certain areas of the Project. The most likely areas for nighttime construction are within commercial and industrial areas and not residential or potentially sensitive biological areas. Night work is not anticipated during O&M except during emergencies.	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-6 activities.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM BIO-11: Special-Status Bird Surveys: Protocol surveys following standard guidelines shall be conducted for California black rail, tricolored blackbird, California clapper rail, burrowing owl, golden eagle, and bald eagle and focused surveys shall be conducted for western snowy plover, white-tailed kite, and other raptors. In the event of the discovery of suitable habitats, nests, or live individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW would be consulted. Tricolored blackbird and burrowing owl are covered species under the Santa Clara Valley HCP; if impacts are identified during species-specific protocol surveys, the take for this species shall be covered either under the HCP or covered under a State ITP in consultation with CDFW. If impacts are identified during species-specific protocol surveys for the other State-listed avian species that are not covered under the Santa Clara Valley HCP (California black rail, California clapper rail, Western snowy plover, bald eagle, and any other avian species that are identified), the take shall be covered under a State ITP in consultation with CDFW. Any other construction activities that may impact special-status birds, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Additionally, qualified biologists shall monitor all active nests to ensure that construction activities are not disturbing the nest. The monitor/inspector shall have the authority to stop work activities upon the discovery of nests or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive birds.	Applicable	**Complete**. Protocol-level surveys for golden eagle were completed by a qualified biologist and included as an attachment to the Project's Quarterly Compliance Report submitted to the CPUC for Quarter 2 of 2026. No golden eagle individuals nor active nests were observed during any of the surveys. If nests or special-status birds are discovered, avoidance measures will be implemented as required to avoid take.
APM BIO-12: Nesting Bird Protection Measures: If feasible, LSPGC shall avoid certain construction activities such as vegetation trimming/removal during the migratory bird nesting or breeding season. When it is not feasible to avoid construction during the nesting or breeding season (generally February 15–August 31), **APM BIO-15** shall be used. Any construction activities that may impact nesting birds including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat shall be monitored by a qualified biologist. Additionally, biologists shall monitor all active nests to ensure that construction activities are not disturbing the nest. The monitor/inspector shall have the authority to stop work activities upon the discovery of nests or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to nesting birds.	Applicable	**Pending**. LSPGC will avoid vegetation trimming and removal during the nesting or breeding season (generally February 15 through August 31) where feasible. Where avoidance is not feasible, preconstruction nest surveys will be conducted in accordance with APM BIO-15 during the nesting season. A qualified biologist will monitor construction activities that may impact nesting birds and will monitor all active nests.
APM BIO-13: Raptor Surveys: If a raptor nest is observed within 500 feet of the Project during protocol or preconstruction surveys, a qualified biologist shall determine if it is active. If the nest is determined to be active, the qualified biologist shall establish an appropriately sized no construction buffer around the nest and shall monitor the nest to ensure that nesting or breeding activities are not substantially adversely affected. If the biological monitor determines that activities associated with the Project are disturbing or disrupting nesting or breeding activities, the monitor shall make recommendations to reduce noise or disturbance in the vicinity of the nest. If the nest is determined to be inactive, the nest shall be removed under direct supervision of the qualified biologist.	Applicable	**Pending**. During the nesting season, raptor surveys will be conducted concurrently with preconstruction nesting bird surveys (APM BIO-15) prior to the start of NTPR-6 activities. If any nests of common raptors are observed within 500 feet of the work area, this measure will be implemented.

Key	
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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM BIO-14: Golden Eagle Protection: The USFWS recommends a one mile no disturbance buffer around active nests during the active nesting season (USFWS 2021). LSPGC shall conduct an eagle nest survey within suitable nesting habitat prior to construction. If preconstruction surveys determine that there is an active golden eagle nest within the Survey Area, LSPGC shall consult with the agencies to identify an appropriate disturbance buffer based on existing conditions, including existing visual barriers, existing noise levels, existing high levels of human activity and vehicle traffic, and other factors. In lieu of placing an avoidance buffer, LSPGC could construct a barrier wall, outside of the nesting season, to obstruct construction activities from line of site from the nest. The barrier would also dampen noise from construction activities. A full-time biological monitor shall monitor the bird(s) for signs of distress. If signs of distress are identified, the biological monitor shall require construction to cease until the birds exhibit normal behavior.	Applicable	**Complete**. Golden eagle protocol-level surveys for the Project were completed by a qualified biologist and included as an attachment to the Project's Quarterly Compliance Report submitted to the CPUC for Quarter 2 of 2026. No golden eagle individuals nor active nests were observed during any of the surveys. If an active golden eagle nest is identified during a preconstruction nesting bird or raptor survey, LSPGC will consult with applicable agencies to identify an appropriate disturbance buffer, and this measure will be implemented as required.
APM BIO-15: Nesting Bird Surveys: Preconstruction nest surveys shall be conducted during the nesting or breeding season (generally February 15–August 31) within all proposed impact areas and suitable buffers within suitable habitat areas for Migratory Bird Treaty Act (MBTA)-protected birds. This survey shall be performed to determine the presence or absence of nesting birds and roosting bats. If roosting bats or active nests (i.e., containing eggs or young) are identified, a suitable construction avoidance buffer shall be implemented to ensure that the nesting or breeding activities are not affected. If the nesting or breeding activities by a Federal- or State-listed species are observed, LSPGC shall consult with the USFWS and CDFW as necessary. Monitoring of the nest shall continue until the birds have fledged or construction is no longer occurring on the site.	Applicable	**Pending**. If construction begins during the nesting season (February 15 through August 31), preconstruction nesting bird surveys will be conducted prior to the start of NTPR-6 construction activities within LZ-1 and the New Street Staging Yard.
APM BIO-16: Special-Status Invertebrate Surveys: Protocol surveys following standard guidelines and during appropriate seasons shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for vernal pool tadpole shrimp, vernal pool fairy shrimp, monarch butterfly, Western bumblebee, and Crotch's bumblebee. In the event of the discovery of suitable habitat, host plants, or individuals of these special-status invertebrates, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If impacts are identified during species-specific surveys for vernal pool tadpole shrimp, vernal pool fairy shrimp, monarch butterfly, Western bumblebee, or Crotch's bumblebee which are not covered under the Santa Clara Valley HCP, the take shall be covered under a Federal ITP (vernal pool tadpole shrimp; Federally Endangered, vernal pool fairy shrimp; Federally Threatened, monarch butterfly; Federal candidate species) or State ITP (Western bumblebee and Crotch's bumblebee; State candidate species) in consultation with CDFW or USFWS. Any other construction activities that may impact special-status invertebrates or their habitats, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of individuals or host plants and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive invertebrates.	Not Applicable	There is no suitable habitat for special-status invertebrate species within the New Street Staging Yard. Therefore, protocol surveys for invertebrate species are not required.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM BIO-17: Wetland, Vernal Pool, and Waterway Construction Timing Restrictions: Construction in the vicinity of waterways, wetlands, and vernal pools such as along the Cushing Parkway bridge that borders the Don Edwards San Francisco Bay National Wildlife Refuge (NWR), near vernal pools north of the existing PG&E Newark substation, and in the vicinity of Coyote Creek and Guadalupe River shall be restricted to occur during the dry season (generally from May 1st through October 15th) to the maximum extent possible. This would minimize the chance of encountering and impacting sensitive species such as vernal pool tadpole shrimp and California tiger salamander that can be found in annual grassland/wetland, wetland, and vernal pool habitat present in these areas as well as fish species such as steelhead, longfin smelt, and green sturgeon that could be using waterways. If construction cannot be conducted during the dry season in the vicinity of waterways, wetlands, and vernal pools, they would be clearly marked and avoided to the maximum extent possible and biological monitors would be present to ensure that no impacts occur.	Not Applicable	There are no wetlands, vernal pools, or waterways within the New Street Staging Yard site.
APM BIO-18: Special-status Amphibian Surveys: Protocol surveys shall be conducted for California tiger salamander and preconstruction surveys shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for California tiger salamander. In the event of the discovery of suitable habitats or live individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted. California tiger salamander is a covered species under the Santa Clara Valley HCP; if impacts are identified during species-specific surveys, the take for this species shall be covered either under the HCP or covered under a State or Federal ITP in consultation with CDFW and/or USFWS. Any other construction activities that may impact special-status amphibians including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive amphibians.	Not Applicable	There is no suitable habitat for California tiger salamander present within the New Street Staging Yard site, and protocol surveys are not required.
APM BIO-19: Wetland and Aquatic Resources Delineations: Pursuant to property owner approval, a wetland and aquatic resources delineation will be conducted on all portions of the proposed Project containing potentially State or Federal jurisdictional waters. Accurate acreages of vernal pools and RWQCB, CDFW, and USACE jurisdictional waters will be defined from these delineations. Vernal pools and jurisdictional waters shall be marked as a sensitive area and shall be avoided to the extent practicable. If these areas cannot be avoided, applicable permits shall be obtained.	Applicable	**Complete.** An aquatic resource delineation survey was completed on September 30, 2025, in which it was determined that no wetlands or aquatic features were present within the New Street Staging Yard.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
Mitigation Measure 3.4-1a: Avoid Impacts to Rare Plants: Rare plant surveys conducted under APM BIO-2 shall be floristic in nature and shall be conducted by a qualified botanist according to procedures outlined in the CDFW publication *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018b). The survey(s) shall be conducted between April and July in accordance with CDFW protocol and in conjunction with the blooming seasons of those rare plants with moderate potential to occur in the survey area. If no special-status plants are observed during appropriately timed surveys by a qualified botanist, it shall be assumed that the construction activity will have no impact on special-status plants and no further action is required. If special-status plants are identified within the survey area, the individuals or populations shall be mapped and quantified and reported to the CNDDB and to the City of San José, and the LSPGC project manager shall be notified at least 14 days prior to construction in that area. Impacts on these known occurrences shall be avoided when feasible. LSPGC shall coordinate with CDFW and/or USFWS staff to establish appropriate avoidance and minimization measures, depending on whether the species is federally and/or state listed, and shall consult with CDFW and/or USFWS to obtain an ITP as required for any impacts that cannot be avoided. Avoidance and minimization measures may include, but need not be limited to: (1) No-disturbance buffers. (2) Work windows for low-impact activities that are compatible with the dormant phase of a special-status plant life cycle but that may kill living plants or severely alter their ability to reproduce. (3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat. (4) Erosion control BMPs such as straw wattles made of rice straw, erosion control blankets, or hydroseeding with a native plant seed mix to prevent sedimentation from upslope construction activities. (5) In consultation with and as authorized by CDFW or USFWS, collection and spreading of seeds or relocation of plants to appropriate locations by a qualified botanist.	Not Applicable	There are no rare plants with moderate or greater PTO within the New Street Staging Yard site, and rare plant surveys are not required. However, in the event a special-status plant species is observed during required preconstruction surveys, this measure will be implemented.
Mitigation Measure 3.4-1b: Habitat Restoration and Monitoring: Before construction in areas containing waters of the U.S. and/or state or CDFW-jurisdictional areas, LSPGC shall obtain all required environmental permits, including a Clean Water Act Section 401 water quality certification for federal and state jurisdictional wetlands, Clean Water Act Section 404 permits for federal jurisdictional, and a CDFW Lake and Streambed Alteration Agreement, and shall adhere to the conditions of each. At least 30 days before the scheduled commencement of Project activities in areas containing waters of the U.S. and/or state or CDFW-jurisdictional areas, LSPGC shall submit a Restoration Plan to all applicable permitting agencies (e.g., USACE, RWQCB, CDFW) and the CPUC for review and written approval. No Project activities shall commence until the Restoration Plan is approved in	Not Applicable	There are no waters of the U.S. or CDFW/state-jurisdictional areas within the New Street Staging Yard, therefore no Restoration Plan is required.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
writing by the applicable resource agency or agencies having jurisdiction. The plan shall detail compensatory mitigation for permanent impacts to riparian and wetland habitat in the form of restoration or enhancement of habitat either on-site (where practicable) or off-site as close to the Project site as practicable. The plan shall also describe the on-site restoration of temporary impacts to riparian and wetland habitat. The Restoration Plan shall also include monitoring and success criteria. Impacts to riparian and wetland habitat shall be restored or otherwise mitigated according to the Restoration Plan within the same calendar year as the impact occurs unless otherwise approved in writing by the applicable resources agency or agencies having jurisdiction. More than one plan may be necessary for restoration activities in different locations. Restoration and monitoring shall be guided by a qualified biologist experienced in wetland habitat restoration. Restoration shall include protocols for replanting native vegetation removed before or during construction, and management and monitoring of the plants to ensure replanting success. The following measures shall apply to site restoration: • Areas affected by construction-related activity shall be replanted or reseeded with locally collected and grown native shrubs and herbaceous species suitable for riparian and wetland locations, under guidance from a qualified restoration biologist. • To ensure a successful revegetation effort, all plants shall be monitored and maintained as necessary for a minimum of 5 years. LSPGC shall submit an annual monitoring report to the CPUC and the applicable resources agency or agencies having jurisdiction during each year of revegetation. • The revegetation shall be considered successful when, after at least 5 years of monitoring (including at least 3 years without supplemental irrigation), each category of plantings (e.g., herbs, shrubs) has a minimum of 85 percent survival, and restoration areas have attained a relative native cover of 70 percent after 3 years and 75 percent after 5 years, unless approved in writing by the applicable resources agency or agencies having jurisdiction. Survival and cover criteria shall both be required unless the herbaceous or spreading plants cannot be differentiated by individual, in which case the cover success criteria alone may be sufficient if determined in writing by the applicable resources agency or agencies having jurisdiction.		

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Mitigation Measure 3.4-1c: Frac-out Plan: To avoid potential indirect impacts to aquatic resources and associated habitats during horizontal boring or horizontal directional drilling (i.e., trenchless techniques) using pressurized drilling fluids, LSPGC or its contractors shall prepare and submit a Frac-out Plan to the CPUC for preventing and addressing potential inadvertent frac-outs prior to construction at HDD sites. The Frac-out Plan shall specify when a biological monitor will be present during the trenchless technique process, and shall limit work associated with trenchless waterway crossings to daylight hours, unless otherwise authorized by CDFW to allow nighttime work, to enable identification of potential frac-outs and/or potential impacts to sensitive species should a frac-out occur. The Frac-out Plan shall also establish communication protocols and training information for construction personnel, the response materials to be available on site to minimize frac-out effects, and effective responses to potential releases of drilling fluids used during the trenchless technique process. LSPGC's Frac-out Plan shall be submitted to the CPUC 30 days before the start of construction.	Not Applicable	There is no horizontal boring or horizontal directional drilling proposed as part of NTPR-6 construction activities. Therefore, no Frac-out Plan is required.
Mitigation Measure 3.4-1d: Protection of Special-Status Wildlife: A qualified biologist shall conduct preconstruction clearance surveys within 7 days prior to the start of construction activities within suitable habitat for special-status species that are known to be present or have a moderate to high potential to occur. In addition to the preconstruction clearance surveys, a qualified biologist shall also be on-site to conduct daily pre-activity surveys and monitoring during all ground-disturbing and vegetation removal activities in suitable habitat for special-status species. The qualified biologist shall conduct daily clearance surveys of all equipment, vehicles, and stockpiled materials at the beginning of each day and regularly throughout the workday, and maintain barriers protecting sensitive habitat areas. The biologist shall ensure that mats are placed for unavoidable equipment passage across sensitive habitats, including vernal pools. If a special-status species is observed in a work area, the qualified biologist shall mark the area for avoidance for the duration of work in the vicinity. If avoidance is not possible, work activities shall cease until the species has left the area on its own, or until other protective action can be taken as authorized by the Santa Clara Valley HCP or a species-specific ITP, in coordination with USFWS and/or CDFW.	Not Applicable	Protocol-level surveys determined that no suitable habitat for golden eagle is present within the New Street Staging Yard. Additionally, LSPGC completed a habitat assessment survey and accompanying desktop review which determined that no suitable habitat for any other species is present within the staging yard. As such, preconstruction clearance surveys for special-status species are not required for NTPR-6 construction activities.

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Mitigation Measure 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP): In addition to the requirements of APM BIO-9, LSPGC shall retain a qualified biologist to conduct preconstruction WEAP training for all personnel entering the Project site. • All personnel associated with construction shall attend the WEAP training prior to initiation of construction activities (including, but not limited to, site preparation, staging and mobilization, vegetation clearance/mowing/trimming, grading, and excavation). The training shall include information about the special-status species potentially occurring within the work areas, identification of special-status species and their habitats, a description of the regulatory status and general ecological characteristics of special-status species, and a review of the limits of construction and measures required to avoid and/or minimize impacts to biological resources within the work area. A fact sheet conveying this information and pertinent Project contacts shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction. • Interpretation shall be provided for non-English-speaking workers. • The same instructions shall be provided for any new workers prior to entering the work area where sensitive species and/or sensitive species habitats may be present. • All employees entering the work areas shall be required to sign a form provided by the qualified biologist(s) documenting they have attended the WEAP and understand the information presented to them. The signed form shall be provided to LSPGC as documentation of training completion. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species and other regulated biological resources. If new personnel are brought onto the work area after completion of the initial WEAP training, the training shall be conducted for all new personnel before they enter the work area where sensitive species and/or their habitats may be present.	Applicable	**Ongoing.** The WEAP was submitted to the CPUC on March 20, 2026. Preconstruction requirements are complete, and LSPGC and its contractors will implement this measure throughout construction. WEAP sign-ins will be attached to the quarterly compliance reports provided to the CPUC.
Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances: All removal of street trees within the cities of Fremont, Milpitas, San José, and Santa Clara shall be coordinated with the responsible department in each city (see Section 3.4.3, *Regulatory Setting*) regarding any ministerial tree removal permits. LSPGC shall make a good-faith effort to comply with all requirements including tree replanting and monitoring to help ensure successful replanting.	Not Applicable	Removal of street trees is not anticipated to be required as part of NTPR-6 activities. As such, this measure is not applicable. If removal of street trees is determined to be required, this measure will be implemented.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM CUL-1: Worker Environmental Awareness Program (WEAP) Training: LSPGC shall obtain a qualified archaeologist to design the cultural resources component of a WEAP that shall be provided to all Project personnel who may encounter and/or alter historical resources or unique archaeological properties, including construction supervisors and field personnel. The WEAP shall be submitted to the CPUC prior to construction. No construction worker shall be involved in ground-disturbing activities without having participated in the WEAP. The WEAP shall include, at a minimum: • Training on how to identify potential cultural resources and human remains during the construction process; • A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; • A discussion of procedures to be followed in the event that unanticipated cultural resources are discovered during implementation of the Project; • A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and LSPGC policies; and • A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies, and other applicable laws and regulations. The WEAP may be conducted in concert with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are designed by a qualified archaeologist, which is defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (36 CFR Part 61).	Applicable	**Ongoing**. A qualified archaeologist prepared the cultural resources training included in the WEAP. Preconstruction requirements are complete, and LSPGC and its contractors will implement this measure throughout construction. WEAP sign-ins will be attached to the quarterly compliance reports provided to the CPUC.

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APM CUL-2: Archaeological and Native American Monitoring: Archaeological and Native American monitoring shall be conducted during initial ground disturbance associated with the Project when within 100 feet (30 m) of previously recorded prehistoric or ethnohistoric resources, or after unanticipated discovery of same. Archaeological monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 m) of previously recorded historic-period resources, or after unanticipated discovery of same. Prehistoric and/or ethnohistoric archaeological sites have been recorded adjacent to the Project area, and the Sacred Lands File (SLF) search and Tribal outreach indicate that lands sacred to the North Valley Yokuts Tribe and the Ohlone Indian Tribe are present within the Project search area. In addition, historic-era archaeological sites have been recorded within 100 feet (30 m) of the Project area. A qualified archaeologist, or an archaeological monitor under the supervision of a qualified archaeologist, shall be retained by LSPGC to monitor excavation in each work area for the Project in accordance with the above monitoring criteria to ensure that there is no impact to any significant unanticipated historical resource. A qualified archaeologist, and a Native American monitor, if determined during Tribal consultation, shall be retained by LSPGC to monitor excavation in each work area for the Project in accordance with the above monitoring criteria to ensure that there is no impact to any significant unanticipated cultural resource. Procedures to be followed in the event that a Native American monitor is not available shall be determined during Tribal consultation. Native American monitoring requirements established in this APM may be superseded by government-to-government consultation conducted between the CPUC and Tribal organizations as part of the Assembly Bill 52 process or otherwise.	Not Applicable	There are no known sensitive historic, prehistoric, or ethnohistoric resources within the NTPR-6 scope or within 100 feet. Therefore, archaeological and Native American monitoring will not be required for NTPR-6 construction activities. In the event there is an unanticipated discovery of sensitive historic, prehistoric, or ethnohistoric resources within the New Street Staging Yard, this measure will be implemented as needed.
APM CUL-3: Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources: In the event that previously unidentified cultural resources are uncovered during implementation of the Project, all work within 100 feet (30 m) of the discovery shall be halted and redirected to another location. LSPGC's qualified archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on State of California Department of Parks and Recreation (DPR) cultural resource records, and no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, LSPGC's qualified archaeologist shall evaluate the significance and California Register of Historic Resources (CRHR) eligibility of the resources and, in consultation with the CPUC, determine appropriate treatment measures. Preservation in place shall be the preferred means to avoid impacts to significant historical resources. Consistent with CEQA Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, LSPGC's qualified archaeologist, in consultation with the CPUC and, if the unearthed resource is prehistoric or Native American in nature, the Native American monitor shall develop additional treatment measures, such as data recovery consistent with CEQA Guidelines 15126.4(b)(3)(C)-(D). Archaeological materials recovered during any investigation shall be curated at an accredited curation facility or transferred to the appropriate Tribal organization.	Applicable	In the event that previously unidentified cultural resources are uncovered during NTPR-6 construction activities, this measure will be implemented as needed.

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APM CUL-4: Cultural Resources Inventory: The limits of construction for the proposed Newark to NRS transmission line within Caltrans ROW, and temporary construction Staging Areas 1, 4 through 8, 10, and part of 11, shall be surveyed prior to construction. If additional proposed facilities and ground-disturbing activities move outside the previously surveyed acreage, the new areas shall be subjected to a cultural resources inventory to ensure that any newly identified cultural resources are either avoided by project redesign or evaluated and treated.	Applicable	**Complete.** A desktop records search and pedestrian surveys for cultural resources were conducted for the New Street Staging Yard on October 16, 2025 and included as an attachment to MPR-4. No sensitive cultural resources were identified.
APM CUL-5: Unanticipated Discovery of Human Remains: Avoidance and protection of inadvertent discoveries that contain human remains shall be the preferred protection strategy where feasible and otherwise managed pursuant to the standards of CEQA Guidelines 15064.5(d) and (e). If human remains are discovered during construction or O&M activities, all work shall be diverted from the area of the discovery and the CPUC shall be informed immediately. LSPGC's qualified archaeologist shall contact the appropriate County Coroner to determine whether or not the remains are Native American. If the remains are determined to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC). The NAHC shall then identify the person or persons it believes to be the most likely descendant of the deceased Native American, who in turn shall make recommendations for the appropriate means of treating the human remains and any associated funerary objects. No part of the Project is located on federal land and no federal monies are involved; therefore, the Project is not subject to the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990.	Applicable	In the event there is an unanticipated discovery of human remains during NTPR-6 construction activities, this measure will be implemented as needed.
Mitigation Measure 3.5-1: Archaeological Monitoring Plan: Prior to authorization to proceed, a Secretary of the Interior-qualified archaeologist shall prepare an archaeological monitoring plan. The plan shall be reviewed by the culturally-affiliated Native American Tribe(s) and the CPUC. The plan will include (but not be limited to) the following components: • Training program for all construction and field workers involved in site disturbance. On-site personnel shall attend a mandatory pre-project training led by a Secretary of the Interior-qualified archaeologist and a Native American representative. The training will outline the general cultural sensitivity of the area and the procedures to follow in the event that cultural materials and/or human remains are inadvertently discovered. • Detailed explanation of where monitoring will be completed and under what circumstances based on soil types, geology, distance to known sites, and other factors. • Person(s) responsible for conducting archaeological monitoring activities, including a request to the culturally affiliated Native American Tribe(s) for a tribal monitor. • Identification of the lead Secretary of the Interior-qualified archaeologist responsible for overseeing and directing the monitors. • How the monitoring will be conducted and the required format and content of monitoring reports. • Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports. • Protocol for notifications in case of encountering cultural resources, as well as methods of dealing	Applicable	**Complete.** The Archaeological Monitoring Plan was submitted to the CPUC for review on March 20, 2026, and submitted to the interested tribes for review on January 30, 2026. No comments were received, and the plan is considered Final.

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with the encountered resources (e.g., collection, identification, curation). • Methods to ensure security of cultural resources. • Protocol for notifying local authorities (i.e., Sheriff, Police) should site looting and other illegal activities occur during construction. During the course of the monitoring, the lead Secretary of the Interior-qualified archaeologist and lead tribal representative or lead tribal monitor may adjust the frequency of the monitoring from continuous to intermittent or vice versa based on the conditions and professional judgment regarding the potential to impact resources. If cultural materials are encountered, all soil-disturbing activities within 100 feet in all directions of the find shall cease until the resource is evaluated and the CPUC project manager concurs with the evaluation. The archaeological monitor shall immediately notify the lead Secretary of the Interior-qualified archaeologist, the CPUC, and its consultant of the encountered resource(s). After making a reasonable effort to assess the identity, integrity, and significance of the encountered resource, in consultation with the culturally affiliated Native American Tribe(s), the lead Secretary of the Interior-qualified archaeologist shall present the findings of this assessment to the CPUC for review no later than 10 calendar days after the find. If it is not possible to present the findings within 10 calendar days, the lead Secretary of the Interior-qualified archaeologist shall explain why doing so is infeasible and when it will be possible to present the findings. If the find is determined to be potentially significant by the CPUC, the lead Secretary of the Interior-qualified archaeologist, in consultation with the CPUC and the culturally affiliated Native American Tribe(s), shall determine whether preservation in place is feasible. Consistent with CEQA Guidelines Section 15126.4(b)(3), this may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If avoidance is not feasible, the CPUC shall consult with the culturally affiliated Native American Tribe(s) and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC [Public Resources Code] Section 21083.2, and CEQA Guidelines Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3).		

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Mitigation Measure 3.5-2: Unanticipated Discovery of Submerged Cultural Resources: If an unanticipated discovery of cultural resources occurs on land under the jurisdiction of the California State Lands Commission (CSLC), the following protocols will be followed. • LSPGC shall immediately notify the CPUC of the discovery and the CPUC shall initiate consultation with CSLC staff within 2 business days of the discovery. • Per Public Resources Code Section 6313(c), any submerged cultural resource remaining in State waters for more than 50 years is presumed to be archaeologically or historically significant. • The qualified archaeologist assessing the find shall have expertise in maritime archaeology if the find is a maritime archaeological resource. • The CPUC shall consult with the CSLC regarding assessment of the find and development of any treatment measures to minimize or mitigate potential impacts on the resource, pursuant to Public Resources Code Section 21083.2 and CEQA Guidelines Section 15126.4. • The CPUC shall submit to the CSLC any report prepared for the resource as part of the assessment of the find and implementation of treatment measures to minimize or mitigate potential impacts.	Not Applicable	There are no aquatic features present within the New Street Staging Yard, therefore there is no potential for discovery for submerged cultural resources.
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures: The following measures shall be implemented during construction to minimize impacts from geological hazards and disturbance to soils: • Keep vehicle and construction equipment within the limits of the Project and in approved construction work areas to reduce disturbance to topsoil; • Geotechnical studies shall be completed to evaluate the risk of geologic hazards associated with the Project. The geotechnical studies shall provide geotechnical engineering recommendations relative to subsurface soil and rock conditions, groundwater conditions, lateral earth pressures, and seismic classifications of the Project area. Recommendations from the geotechnical studies shall be considered in the final design; • Avoid construction in areas with saturated soils, whenever practical, to reduce impacts to soil structure and allow safe access. Similarly, avoid topsoil salvage in saturated soils to maintain soil structure; • Keep topsoil material on-site in the immediate vicinity of the temporary disturbance or at a nearby approved work area to be used in restoration of temporary disturbed areas. Temporary disturbance areas shall be re-contoured following construction to match pre- construction grades. Areas shall be allowed to re-vegetate naturally or be reseeded with a native seed mix from a local source if necessary. On-site material storage shall be sited and managed in accordance with all required permits and approvals; and • Keep vegetation removal and soil disturbance to a minimum and limited to only the areas needed for construction. Removed vegetation shall be disposed of off-site to an appropriate licensed facility or can be chipped on-site to be used as mulch during restoration.	Applicable	LSPGC and its contractors will implement this measure during construction as needed. Geotechnical studies are not required for preparation and use of the New Street Staging Yard.

Key	
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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
APM PALEO-1: Paleontological Mitigation Monitoring Plan (PRMMP): Prior to the issuance of grading permits, a qualified paleontologist shall be retained to prepare and oversee the PRMMP for the Project. The PRMMP shall contain monitoring procedures, define areas and types of earthwork to be monitored, and provide methods for determining the significance of fossil discoveries. The PRMMP shall direct that a qualified paleontological monitor (working under the supervision of the qualified paleontologist) shall monitor all excavations or grading at depths exceeding seven feet bgs where potentially fossil-bearing alluvial deposits of Pleistocene age may be present. The duration and timing of paleontological monitoring shall be determined by the qualified paleontologist based on the grading plans and construction schedule and may be modified based on the initial results of monitoring. The PRMMP shall state that any fossils that are collected shall be prepared to the point of curation, identified to the lowest reasonable taxonomic level, and curated into a recognized professional repository (e.g., San Diego Natural History Museum [SDNHM], University of California Museum of Paleontology [UCMP]), along with associated field notes, photographs, and compiled fossil locality data. The repository shall be contracted prior to the start of earthwork to curate and store any discovered and recovered fossils. Such an institution shall be a recognized paleontological specimen repository with a permanent curator, such as a museum or university. Donation of the fossils shall be accompanied by financial support for initial specimen curation and storage. Following the completion of the above tasks, the qualified paleontologist shall prepare a final mitigation report that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. The report shall be submitted to appropriate agencies, as well as to the designated repository.	Applicable	**Complete.** The preconstruction requirements are complete. A qualified paleontologist has prepared the PRMMP for the Project. The PRMMP was submitted to the CPUC for their records on March 20, 2026. No paleontological monitoring is anticipated to be required for NTPR-6 construction activities per the PRMMP.
APM PALEO-2: Paleontological Resources Findings: If paleontological resources are encountered during ground disturbing activities when the qualified paleontologist or paleontological monitor is not on-site (an inadvertent discovery), earthwork within the vicinity of the discovery shall immediately halt, and the qualified paleontologist shall evaluate the significance of the fossil discovery. If the fossil discovery is deemed significant, the fossil shall be recovered using appropriate recovery techniques based on the type, size, and mode of preservation of the unearthed fossil. Earthwork may resume in the area of the fossil discovery once the fossil has been recovered and the qualified paleontologist deems the discovery site has been mitigated to the extent necessary.	Applicable	In the unlikely event paleontological resources are encountered during NTPR-6 construction activities, this measure will be implemented as needed.
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan: A site-specific SPCCP shall be prepared prior to the initiation of storage of hazardous liquids on the Project site in excess of the appropriate regulatory thresholds. In the event of an accidental spill, the Project shall be equipped with secondary containment that meets SPCCP guidelines. The secondary containment shall be sufficiently sized to accommodate accidental spills. The plan shall be provided to the CPUC prior to construction for recordkeeping.	Applicable	**Complete.** A SPCCP has been developed and will be implemented before the initiation of storage of hazardous liquids in excess of the appropriate regulatory thresholds, if such storage is necessary within the New Street Staging Yard. Should the SPCCP need to be amended for NTPR-6 activities, it will be submitted to the CPUC as needed prior to the initiation

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
		of storage of hazardous liquids above applicable thresholds.
Mitigation Measure 3.9-1a: Pre-construction Hazardous Materials Assessment: Prior to the preparation of the Health and Safety Plan and Soils and Groundwater Management Plan for the Project, LSPGC or its contractor(s) shall perform a limited soil and groundwater investigation at proposed construction work areas that overlap with the Cisco Systems 6/Syntax Court Disposal Site and South Bay Asbestos Superfund Site to characterize soil and groundwater quality prior to construction. Samples shall be collected from each of the proposed work areas that will be disturbed during project construction, and these samples shall be collected to the depth of the planned excavation. Subsurface soil samples shall be analyzed for total petroleum hydrocarbons (TPH) (e.g., gasoline, diesel, and waste oil), Title 22 metals, volatile organic compounds (VOCs), and polychlorinated biphenyls (PCBs) to evaluate the potential presence of contamination. Groundwater samples shall be collected if subsurface excavations are anticipated to require dewatering. Additional analyses for VOCs and semi-volatile organic compounds (SVOCs) shall be conducted for groundwater samples collected at construction locations within 1,000 feet of adjacent landfills. In the event the assessment identifies hazardous materials issues, the results of the hazardous materials assessment shall be incorporated into the Site Health and Safety Plan prepared in accordance with Mitigation Measure 3.9-1b and the Soil and Groundwater Management Plan prepared in accordance with Mitigation Measure 3.9-1c to determine whether specific soil and groundwater management and disposal procedures for contaminated materials are required, whether excavated soils are suitable for reuse, and whether construction worker health and safety procedures for working with contaminated materials are required. In the event the assessment does not identify hazardous materials issues, LSPGC shall implement APM WQ-1. LSPGC shall compile the results of these assessments and analyses into a Preconstruction Hazardous Materials Assessment, and shall submit this Preconstruction Hazardous Materials Assessment to the CPUC no less than 60 days before the start of construction within the affected areas.	Not Applicable	The New Street Staging Yard does not overlap with the Cisco Systems 6/Syntax Court Disposal Site and the South Bay Asbestos Superfund Site.

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Mitigation Measure 3.9-1b: Health and Safety Plan: LSPGC or its contractor(s) shall retain a qualified environmental professional to prepare a site-specific Health and Safety Plan (HASP) in accordance with federal OSHA regulations (29 CFR 1910.120) and Cal/OSHA regulations (8 California Code of Regulations Title 8, Section 5192). Because anticipated contaminants vary depending upon the location of proposed improvements in the Project area and may vary over time, the HASP shall address site-specific worker health and safety issues during construction. The HASP shall include the following information: • Results of sampling conducted in accordance with Mitigation Measure 3.9-1a. • All required measures to protect construction workers and the general public by including engineering controls, monitoring, and security measures to prevent unauthorized entry to the construction areas and to reduce hazards outside of the construction areas. If prescribed contaminant exposure levels are exceeded, personal protective equipment shall be required for workers in accordance with state and federal regulations. • Required worker health and safety provisions for all workers potentially exposed to contaminated materials, in accordance with state and federal worker safety regulations, and designated qualified individual personnel responsible for implementation of the HASP. • The contractor shall have a site health and safety supervisor fully trained pursuant to hazardous materials regulations be present during excavation, trenching, or cut and fill operations to monitor for evidence of potential soil contamination, including soil staining, noxious odors, debris or buried storage containers. The site health and safety supervisor must be capable of evaluating whether hazardous materials encountered constitute an incidental release of a hazardous substance or an emergency spill. The site health and safety supervisor shall implement procedures to be followed in the event of an unanticipated hazardous materials release that may impact health and safety. These procedures shall be in accordance with hazardous waste operations and regulations and shall specifically include, but need not be limited to: 1) immediately stopping work in the vicinity of the unknown hazardous materials release; 2) notifying Santa Clara County Department of Health, Regional Water Quality Control Board, or Department of Toxic Substances Control; and 3) retaining a qualified environmental firm to perform sampling, remediation, and/or disposal. • Documentation of HASP measures that shall be implemented during the Project's construction. • Provision that submittal of the HASP to LSPGC, or any review of the contractor's HASP by LSPGC, shall not be construed as approval of the adequacy of the contractor as a health and safety professional, the contractor's HASP, or any safety measure taken in or near the construction site. The contractor shall be solely and fully responsible for compliance with all laws, rules, and regulations applicable to health and safety during the performance of the construction work. LSPGC shall submit the Health and Safety Plan to the CPUC 30 days before the start of construction, or upon receipt of the results of the Preconstruction Hazardous Materials Assessment (whichever comes first).	Applicable	**Complete.** The HASP for the Project was submitted to the CPUC on March 17, 2026, and will be implemented during NTPR-6 construction activities as applicable. The NTPR-6 scope does not overlap with the Cisco Systems 6/Syntax Court Disposal Site and the South Bay Asbestos Superfund Site and would not be subject to the sampling requirements pertaining to MM 3.9-1a.

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APM HAZ-2: Hazardous Materials Management Plan: A HMMP shall be prepared and implemented for the Project. The plan shall be prepared in accordance with relevant state and federal guidelines and regulations (e.g., Cal/OSHA). The plan shall include the following information related to hazardous materials and waste, as applicable: • A list of hazardous materials present on-site during construction and O&M to be updated as needed, along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements; • A Hazardous Materials Communication (i.e., "HAZCOM") Plan; • Assignments and responsibilities of Project health and safety roles; • Standards for any secondary containment and countermeasures required for hazardous materials; • Spill response procedures based on product and quantity. The procedures shall include materials to be used, location of such materials within the Project area, and disposal protocols; and • Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This would include termination of work within the area of suspected contamination sampling by an OSHA-trained individual and testing at a certified laboratory. The plan shall be provided to the CPUC prior to construction for recordkeeping. Plan updates shall be made and submitted as needed if construction activities change such that the existing plan does not adequately address the Project.	Applicable	**Complete.** The HMMP was submitted to the CPUC on March 20, 2026 for their records. The HMMP will be implemented as required during NTPR-6 construction activities.
APM HAZ-3: Compliance with the Covenant to Restrict Use of Property: Construction activities within the Cisco Systems Site 6/Syntax Court Disposal Site boundaries (as outlined in Figure 5.9-1, *Contaminated Sites Map*) shall comply with the Covenant to Restrict Use of Property and Environmental Restriction, signed May 23, 2003. Specific activities could include: a) Providing written notice to the Department of Toxic Substances Control (DTSC) at least 14 days prior to ground disturbing construction activities with the location of excavation, proposed depth, and soil management procedures. b) Conducting construction activities in accordance with the SMP and the Health and Safety Plan (2001 and 2015 update). c) Handling excavated soils in accordance with all applicable local, state, and federal regulations.	Not Applicable	The New Street Staging Yard does not overlap with the Cisco Systems 6/Syntax Court Disposal Site.

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APM HAZ-4: Compliance with the Covenant and Agreement for Environmental Restriction: Construction activities within the South Bay Asbestos Area site boundaries shall comply with the Covenant and Agreement for Environmental Restriction, signed October 21, 2004, by the property owner and the DTSC. Specific activities would include, but not necessarily be limited to, the following: a) Coordinating with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Lead Agency and gaining written approval for ground disturbing activities that could affect the soil cap. b) Preparing a SMP for any soils contaminated with asbestos or asbestos containing materials brought to the surface by grading, excavation, trenching, or backfilling.	Not Applicable	The New Street Staging Yard does not overlap with the South Bay Asbestos Area site.

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Mitigation Measure 3.9-1c: Soil and Groundwater Management Plan: LSPGC or its contractor(s) shall direct the construction contractor to prepare and implement a Soil and Groundwater Management Plan, subject to review by the CPUC and the San Francisco Bay Regional Water Quality Control Board, as well as the Alameda County Water District (for activities within its service area), that specifies the method for handling and disposal of contaminated soil and groundwater prior to construction. The plan shall include all necessary procedures to ensure that excavated materials and fluids generated during construction are stored, managed, and disposed of in a manner that is protective of human health and in accordance with applicable laws and regulations. The plan shall include the following information. • Step-by-step procedures for evaluation, handling, stockpiling, storage, testing, and disposal of excavated material, including criteria for reuse and offsite disposal. All excavated materials shall be inspected prior to initial stockpiling, and spoils that are visibly stained and/or have a noticeable odor shall be stockpiled separately to minimize the amount of material that may require special handling. In addition, excavated materials shall be inspected for buried building materials, debris, and evidence of underground storage tanks; if identified, these materials shall be stockpiled separately and characterized in accordance with landfill disposal requirements. If some of the spoils do not meet the reuse criteria and/or debris is identified, these materials shall be disposed of at a permitted landfill facility. • Procedures to be implemented if unknown subsurface conditions or contamination are encountered, such as previously unreported tanks, wells, or contaminated soils. • Procedures for containment, handling, and disposal of groundwater generated from construction dewatering, including the method(s) used to analyze groundwater for hazardous materials likely to be encountered at specific locations (based on the results of Mitigation Measure 3.9-1a), and the appropriate treatment and/or disposal methods. This would include describing procedures to prevent preferential runoff pathways or the cross-connection of aquifers during the drilling for the tower piers. LSPGC shall submit the Soil and Groundwater Management Plan to the CPUC 30 days before the start of construction, or upon the receipt of the results of the Preconstruction Hazardous Materials Assessment (whichever comes first).	Applicable	**Complete.** The Soil and Groundwater Management Plan was submitted to the CPUC on March 16, 2026, and was submitted to the San Francisco Bay Regional Water Quality Board the Alameda County Water District on April 10, 2026. The Soil and Groundwater Management Plan will be implemented, as applicable, during NTPR-6 construction activities.
APM WQ-1: Groundwater Dewatering and Discharge Measures: Groundwater, if encountered during construction, shall be handled and discharged in accordance with all state and federal regulations including the following: • Recovered groundwater shall be contained on-site and tested prior to discharge; • When testing determines water is suitable for land application, discharge may be applied to flat, vegetated, upland areas, used for dust control, or used in other suitable construction operations; • Land application shall be made in a manner that discharge does not result in substantial erosion;	Applicable	This measure will be implemented in the event dewatering is required during NTPR-6 construction activities.

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• Water unsuitable for land application shall be disposed of at an appropriately permitted facility; and • Discharge to surface waters or storm drains may occur only if permitted by the agency(ies) with jurisdiction over the resource (e.g., USACE, RWQCB, and/or CDFW, as applicable).		
APM REC-1: Trail Management Plan: LSPGC shall coordinate with the City of Fremont, City of Milpitas, City of San José, City of Santa Clara, the National Park Service (NPS), Metropolitan Transit Commission (MTC), and the USFWS for the preparation of the Project TMP. The TMP shall identify if a detour route(s) is required, as well as provide for trail-specific traffic control and safety measures for pedestrians, trail users, and motorists. Measures that may be implemented by LSPGC as part of the TMP include, but are not limited to, provision of a crossing guard during periods of active construction along the portions of the trails that would be directly impacted by construction of the Project or designation of a detour route if use of a crossing guard is not practical. Signage and flagging may be used to help direct trail users and provide safety for both trail users and construction crews. A copy of the TMP shall be provided to CPUC for recordkeeping.	Not Applicable	NTPR-6 construction activities will not impact any existing trails where a Trail Management Plan will be required.
APM TRA-2: Coordinate Bus Stop Closures: If bus stop closures are required for Project implementation, LSPGC shall coordinate closures with Santa Clara VTA and/or Alameda-Contra Costa County Transit ("AC Transit"), as appropriate, in advance of closure to minimize disruptions to service. Where disruptions to service are anticipated, advanced notice shall be given to allow transit users on effected routes to identify and locate a temporary interim bus stop(s). Measures that may be implemented to give advanced notice of disruptions to service may include, but not necessarily be limited to, posting signage at bus stops with planned closures and posting notices for anticipated route detours and bus stop closures on the Santa Clara VTA and AC Transit websites. Identification and implementation of specific measures shall be implemented in coordination with Santa Clara VTA and AC Transit.	Not Applicable	Bus stop closures are not anticipated to be required for NTPR-6 activities.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	APPLICABILITY TO NTPR-6	STATUS
Mitigation Measure 3.17-2a: Implement Coordinated Traffic Control Plan: LSPGC shall coordinate with Project proponents, contractors, and local agencies, as applicable, for other construction projects in the Project's vicinity that may temporally overlap with Project construction, including, but not limited to, projects identified as potentially contributing to cumulative effects. In consideration of these coordination efforts, at least 30 days before the issuance of construction or building permits, LSPGC shall prepare and implement a traffic control plan for roadways adjacent to and directly affected by the Project. The traffic control plan shall address the transportation impact(s) of the temporally overlapping construction projects within the Project vicinity. The traffic control plan shall include, but not be limited to, the following requirements: • Coordination of individual traffic control plans for the Project with nearby projects. As is available, the individual traffic controls plans shall be appended to the Project's traffic control plan. • Coordination between LSPGC, Project proponents, contractors, and local agencies in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address: - Full and partial roadway closures. - Circulation and detour plans to include the use of signage and flagging to guide vehicles through or around the construction zone and any temporary traffic control devices. - Bicycle or pedestrian detour plans, where applicable. - Parking along public roadways. - Haul routes for construction trucks and staging areas for instances when multiple trucks arrive at the work sites. - Protocols for updating the traffic control plan to account for delays or changes in the schedules of individual projects. - LSPGC's traffic control plan, with proof of coordination, shall be submitted to the CPUC at least 30 days before the start of construction.	Not Applicable	Traffic control is not anticipated to be required for NTPR-6 construction activities within LZ-1 and the New Street Staging Yard. In the event traffic control is determined to be required at the staging area, a Traffic Control Plan will be approved by the applicable local jurisdiction and will be submitted to the CPUC prior to the start of traffic control activities.
Mitigation Measure 3.17-2b: Infrastructure Repair Reporting: After completion of the repair of any damaged roads, sidewalks, trails, and bicycle facilities resulting from Project construction activities, LSPGC shall submit a report to the CPUC and other jurisdictions whose facilities have been affected by Project construction (e.g., city, county, state, etc.) to confirm repairs are consistent with preconstruction conditions, and in accordance with applicable requirements associated with permits granted for the Project. The report shall be submitted within 30 days following completion of the repair(s).	Applicable	LSPGC and its contractors will implement this measure as needed for NTPR-6 construction activities.

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APM TCR-1: WEAP Training: LSPGC shall work with interested Tribes to design the TCRs component of a WEAP that shall be provided to all Project personnel who may encounter and/or alter TCRs or prehistoric/ethnohistoric archaeological properties, including construction supervisors and field personnel. The WEAP shall be submitted to the CPUC prior to construction. No construction worker shall be involved in ground-disturbing activities without having participated in the WEAP. The WEAP shall include, at a minimum: • Training on how to identify potential TCRs and human remains during the construction process; • A review of applicable regulations pertaining to TCRs; • A discussion of procedures to be followed in the event that unanticipated TCRs are discovered during implementation of the Project; • A discussion of culturally appropriate dignity, taking into account the Tribal cultural values and meaning of the resource, including the cultural character and integrity, traditional uses, and confidentiality of resources. • A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies, and other applicable laws and regulations. The WEAP may be conducted in concert with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are designed with the input of interested Tribes.	Applicable	**Complete.** The cultural resources component of the WEAP was submitted to the CPUC and interested tribes for review on March 20, 2026, and the plan has been approved. Preconstruction requirements are complete, and the WEAP training will be implemented on an ongoing basis during construction.
APM TCR-2: Native American Monitoring: Native American monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded prehistoric, ethnohistoric, or TCRs. Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the SLF search and Tribal outreach indicates that lands sacred to the North Valley Yokuts Tribe and the Ohlone Indian Tribe are present within the Project search area. A Native American monitor determined during Tribal consultation shall be retained by LSPGC to monitor excavation associated with the Project to ensure that there is no impact to any significant unanticipated prehistoric, ethnohistoric, or TCR. Prior to construction, LSPGC shall confer with a designated Tribal representative on the appropriate course of action to be taken should unanticipated cultural materials, and specifically human remains, be discovered during construction. Native American monitoring requirements established in this APM may be superseded by government- to-government consultation conducted between the CPUC and Tribal organizations as part of the AB 52 process or otherwise.	Not Applicable	There are no known tribal cultural resources within New Street Staging Yard, and Native American monitoring is not anticipated to be required. The Archaeological Monitoring Plan (MM 3.5-1) was submitted to interested tribes on January 30, 2026, which includes the appropriate protocol to be followed in the event unanticipated cultural materials or human remains are discovered during construction per this measure. No comments were received and the plan is considered Final.

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APM UTIL-1: Coordination with Utilities: LSPGC shall notify all utility companies with utilities located within or crossing the Project ROW to locate and mark existing underground utilities along the entire length of the Project. Due to the linear nature of transmission line construction, utilities shall be marked in short segments at least 72 hours prior to construction within said segments. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. In the event of a conflict, areas of subsurface excavation shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering, or relocation of the existing utility shall be coordinated with each utility owner/operator. LSPGC shall coordinate with third-party utilities and shall submit the intended construction methodology to the owner of the third-party utility for review and coordination. Construction methods shall be adjusted as necessary to ensure that the integrity of existing utility lines is not compromised.	Applicable	**Pending**. LSPGC will notify all companies with utilities located within and crossing the NTP-6 work area, and utilities will be marked in short segments at least 72 hours prior to any subsurface excavation with the potential to conflict with a buried utility within the New Street Staging Yard. Where NTP-6 activities conflict with existing utilities, LSPGC will coordinate and implement this measure as required.
Mitigation Measure 3.19-5: Utility Coordination and Induction Study: At least 90 days prior to the start of construction, LSPGC shall notify all municipalities, companies, and other public and private entities owning and maintaining utilities within or crossing the right-of-way of the Project, and shall positively identify and confirm the location and type of any utilities present. For those identified utilities that do not pose a threat of AC-induced corrosion attributable to the Project, APM UTIL-1 shall be implemented. For the three identified natural gas pipelines, and all other utilities potentially affected by Project-related AC-induced corrosion (i.e., coated metallic pipelines), design and construction of the Project's 230 kV transmission lines shall be coordinated with the applicable utility owners to definitively locate each utility relative to the Newark to NRS 230 kV transmission line, determine the distance of separation between the transmission line and potentially affected utility, and determine the point of intersection and/or distance along which the Project transmission line is parallel to the utility. LSPGC shall prepare a detailed induction study for all identified existing utilities potentially affected by the Project transmission line alignments. At minimum, the study shall include, but not be limited to, a detailed analysis of the known [coated metallic] pipelines or other utilities identified during these utility surveys (e.g., segment identification assessments); shall identify adequate and implementable measures to avoid corrosion potential; and shall present commitments to the implementation of those actions, including a design of the AC mitigation system for any pipeline found to exceed a time-weighted average of either 30 amperes per square meter, if DC current density exceeds 1 ampere per square meter, or 100 amperes per square meter, if DC current density is less than 1 ampere per square meter. Pursuant to Section 6.2 of National Association of Corrosion Engineers SP21424-2018, Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring, the induction study shall demonstrate that any required mitigation system would reduce an AC density level to either: (1) less than a time weighted average of 30 amperes per square meter if the	Not Applicable	NTPR-6 construction activities within LZ-1 and the New Street Staging Yard do not involve installation of transmission lines.

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DC current density exceeds 1 ampere per square meter, or (2) less than a time weighted average of 100 amperes per square meter if the DC current is less than 1 ampere per square meter. No less than 60 days prior to the start of construction of a segment containing an underground utility or utilities identified as being materially affected by accelerated corrosion caused by the Project, LSPGC shall submit the full induction study for the affected segment, including the AC mitigation component, to the CPUC for review and concurrence. Once the CPUC concurrence is secured, LSPGC shall implement the AC mitigation system prior to energization of the Project, phased into the construction process as appropriate. LSPGC shall bear the cost of implementing and maintaining the AC mitigation system as it is part of the Project.		

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